



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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ATLANTA, GEORGIA 30303-1257**

January 24, 2018

MEMORANDUM TO: Shaun Anderson, Chief
Reactor Inspection Branch
Office of Nuclear Reactor Regulation

FROM: Alan Blamey, Chief **/RA/**
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Division of Reactor Projects

SUBJECT: APPROVAL FOR CREDIT FOR THE SEQUOYAH
OPERATIONAL SAFETY REVIEW TEAM TO THE BASELINE
INSPECTION SAMPLES/HOURS

The purpose of this Memorandum is to request approval for the one-time credit, for the Sequoyah Operational Safety Review Team (OSART), to the baseline inspection of the Reactor Oversight Program in accordance with MC 2515, "Light-Water Reactor Inspection Program – Operations Phase", Section 2515-08.05, Baseline Inspection Credit for Operational Safety Review Team Effort.

As an incentive to encourage licensee participation in the OSART mission, the NRC will grant a one-time regulatory credit (reduction in baseline inspection program) for those NRC baseline inspections, listed in Section 08.05, that overlap, either in part or fully, with the OSART review.

Specifically, MC 2515, Section 08.05 notes that:

In order for the region to take one-time credit for reducing baseline inspections, the areas for which the credit is to be given must have been documented in the OSART report. In addition, an NRC staff person should closely monitor the OSART activities, such as attending the team's briefings to the licensee. The staff person should assess whether the regulatory credit assumptions were appropriate. This person also needs a good understanding of the issues and recommendations made by the OSART. For NRC planning purposes, this effort is estimated to take approximately 40 hours. Also, the region should assure that the OSART inspection report is made publicly available.

During the Sequoyah OSART Mission the IAEA Team, by IAEA policy, would not allow the resident inspectors to observe the daily OSART meeting nor attend the daily team meetings with the licensee. Therefore, the resident inspectors were not able to fully observe specific OSART mission inspection discussions. Instead, the resident inspectors reviewed Sequoyah's

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Condition Reports (CRs), and they discussed the OSART mission with the Sequoyah licensing staff and operations staff during plant tours to gain insights into the issues identified by the OSART mission. In addition, the draft OSART report was reviewed by the resident inspectors, DRS Health Physics inspectors and Emergency Planning inspectors.

Based on MC 2515 and the average hours provided in each inspection procedure resource estimate, listed in MC 2515, Section 08.05, the maximum one-time OSART inspection credit is 231 hours. For this OSART activity Region II recommends a one-time credit of 156 hours. The following summarizes the basis for this recommendation. A more detailed inspection procedure (IP) review can be found in Attachment 1.

Radiation Safety inspections should be credited 31 hours out of a maximum possible 63 hours. The credit is based on a review of the radiation safety related inspection activities documented in the OSART draft report, final report and Radiation Protection activities observed during the OSART inspection. Because all of the inspection areas contained within the NRC inspection procedures (IP 71124.01 thru IP 71124.08) were not observed during the inspection nor documented in the report, the recommended hours credited to NRC Region II radiation safety inspection activities were reduced.

Emergency Planning (EP) inspections should be credited 0 hours out of a maximum possible 10 hours. The biennial EP IPs 71114.03, "Emergency Response Organization Staffing and Augmentation System" and 71114.05, "Maintenance of Emergency Preparedness", were completed on September 22, 2017 (after completion of the OSART inspection and prior to issuance of the OSART inspection report). Providing credit for inspections that will not be performed until September 2019, did not meet the intent of the credit guidelines established in IMC 2515 sections 08.04, "Completion of Inspection Procedures," and 08.05.

Surveillance Testing and Fire Protection (IP 71111.22 and IP 71111.05AQ) should be credited 0 hours out of maximum possible 34 hours. The credit is based on the summary of surveillance and fire protection inspection activities documented in the OSART draft report, final report and activities observed during the OSART inspection. Because the inspection areas contained within the NRC inspection procedures (IP 71111.22 thru IP 71111.05AQ) were not observed during the inspection nor documented in the report, no credit is warranted for these areas.

Problem Identification and Resolution (IP 71152B), should be given full credit of 125 hours. The credit is based on the inspection activities documented in the OSART draft report, final report and activities observed during the OSART inspection.

Region II also reviewed the past inspection credit that was provided for OSART inspections. Specifically, at Seabrook in June 2011, the NRC credited 169 hours, providing full regulatory inspection credit for all areas with the exception of Emergency Preparedness which was zero and PI&R which was 25% vice 50%. As noted previously Region II is recommending 156 hours of credit be given.

In addition, MC 2515 notes that the region should ensure that the OSART report will be made publically available. Since this is an IAEA report, not an NRC report, Region II will work with the Office of International Programs to determine if the Sequoyah OSART report will be publically available.

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If you need more information about the content of this memorandum, please contact me at 404-997-4415.

Enclosures:

1. MC 2515-08.05
2. Attachment 1, Sequoyah OSART Crediting Recommendation

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SUBJECT: APPROVAL FOR CREDIT FOR THE SEQUOYAH
OPERATIONAL SAFETY REVIEW TEAM TO THE BASELINE
INSPECTION SAMPLES/HOURS January 24, 2018

ADAMS Accession No. **ML18024A025**

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DATE	1/23/2018	1/23/2018			

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08.05 Baseline Inspection Credit for Operational Safety Review Team Effort. The Operational Safety Review Team (OSART) review is performed by senior staff members from International Atomic Energy Agency member states. The OSART missions offer a means of assessing licensee performance and reinforcing plant self-assessments through an independent assessment process. OSART's focus is on the safety and reliability of plant operation. They review the operation of the plant and the performance of the plant's management and staff rather than the adequacy of the plant's design and compliance with its licensing basis. Based on a review of sample OSART reports and the OSART guidelines, the staff determined that although the OSART review is not risk-informed, some areas of the review overlap with the ROP baseline inspection program. The NRC believes that it would be beneficial for the U.S. nuclear power industry to continue its participation in the OSART missions.

As an incentive to encourage licensee participation in the OSART mission, the NRC grants a one-time regulatory credit (reduction in baseline inspection program) for those NRC baseline inspections that overlap, either in part or fully, with the OSART review. Accordingly, a 25 percent ROP baseline inspection credit shall be given for the following baseline inspection procedures:

- IP 71111.22, "Surveillance Testing"
- IP 71111.05AQ, "Fire Protection"
- IP 71124.01, "Radiological Hazard Assessment and Exposure Controls"
- IP 71124.02, "Occupational ALARA Planning and Controls"
- IP 71124.03, "In-Plant Airborne Radioactivity Control and Mitigation"
- IP 71124.04, "Occupational Dose Assessment"
- IP 71124.05, "Radiation Monitoring Instrumentation"
- IP 71124.06, "Radioactive Gaseous and Liquid Effluent Treatment"
- IP 71124.07, "Radiological Environmental Monitoring Program"
- IP 71124.08, "Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation"

In addition, a 50 percent ROP baseline inspection credit shall be given for the following inspection procedures:

- IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"
- IP 71114.05, "Maintenance of Emergency Preparedness"
- IP 71152B, "Problem Identification and Resolution"

In order for the region to take one-time credit for reducing baseline inspections, the areas for which the credit is to be given must have been documented in the OSART report. In addition, an NRC staff person should closely monitor the OSART activities, such as attending the team's briefings to the licensee. The staff person should assess whether the regulatory credit assumptions were appropriate. This person also needs a good understanding of the issues and recommendations made by the OSART. For NRC planning purposes, this effort is estimated to take approximately 40 hours. Also, the region should assure that the OSART inspection report is made publicly available. Specific OSART findings should not normally be referenced or followed-up by the NRC, however, where a significant safety issue (potentially greater than Green) or a potential violation of an NRC requirement is identified, the NRC will independently conduct an appropriate baseline inspection to disposition potential violations and assess the significance of the finding in accordance with the ROP. These findings will be documented in

accordance with NRC Inspection Manual Chapter (IMC) 0612, "Power Reactor Inspection Reports," and will also be processed as performance assessment inputs equivalent to NRC identified findings in accordance with IMC 0305, "Operating Reactor Assessment Program." The staff will perform any additional inspections for those findings that have a significance greater than Green in accordance with NRC's Action Matrix. The baseline inspection credit and NRC staff position described above are communicated to the Commission via a memorandum dated July 16, 2003 (ADAMS Accession Numbers: ML031620369, ML030930251, ML0316020346).

Sequoyah OSART Crediting Recommendation

Sequoyah OSART RP Crediting Recommendation									
RP Program Inspections 25% Reduction	Inspection Frequency	2018				2019			
		IP Requirements		One-Time OSART Credit			One-Time OSART Credit		
		Sample size	Inspection Hours	Sample Reduction	% IP Samples	Hours Reduction	% IP Samples	Hours Reduction	% IP Hours
IP 71124.01, "Radiological Hazard Assessment and Exposure Controls"	Annual	7	32	2	29%	9	N/A	N/A	N/A
IP 71124.02, "Occupational ALARA Planning and Controls"	Biennial	5	54	2	40%	22	N/A	N/A	N/A
IP 71124.03, "In-Plant Airborne Radioactivity Control and Mitigation"	Biennial	4	16	0	0%	0	N/A	N/A	N/A
IP 71124.04, "Occupational Dose Assessment"	Biennial	5	20	0	0%	0	N/A	N/A	N/A
IP 71124.05, "Radiation Monitoring Instrumentation"	Biennial	3	32	0	0%	0	N/A	N/A	N/A
IP 71124.06, "Radioactive Gaseous and Liquid Effluent Treatment"	Biennial	6	35	N/A	N/A	N/A	0	0	0%
IP 71124.07, "Radiological Environmental Monitoring Program"	Biennial	3	29	N/A	N/A	N/A	0	0	0%
IP 71124.08, "Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation"	Biennial	6	34	N/A	N/A	N/A	0	0	0%
MC 2515 Maximum Hours Credit (25%)	63								
Total RP Inspection Hours Scheduled, 2018-2019	252								
Total RP Hours Credited for OSART, 2018-2019	31								
Total RP % Credit for OSART, 2018-2019	12%								

Note: Inspection hours are based on the **average** hours provided by the inspection procedure. **N/A** is for the second performance of an annual (one-time credit) and for the year that the biennial not performed.

Sequoyah OSART Crediting Recommendation

Sequoyah OSART EP Crediting Recommendation											
	Inspection Frequency	2018					2019				
		IP Requirements		One-Time OSART Credit				One-Time OSART Credit			
		Sample size	Inspection Hours	Sample Reduction	% IP Samples	Hours Reduction	% IP Hours	Sample Reduction	% IP Samples	Hours Reduction	% IP Hours
EP Program Inspections 50% Reduction											
IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"	Biennial	1	8	N/A	N/A	N/A	N/A	0	0%	0	0%
IP 71114.05, "Maintenance of Emergency Preparedness"	Biennial	1	12	N/A	N/A	N/A	N/A	0	0%	0	0%
MC 2515 Maximum Hours Credit (50)%	10										
Total EP Inspection Hours Scheduled, 2018-2019	20										
Total EP Hours Credited for OSART, 2018-2019	0										
Total EP % Credit for OSART, 2018-2019	0%										

Note: Inspection hours are based on the **average** hours provided by the inspection procedure. **N/A** is for the second performance of an annual (one-time credit) and for the year that the biennial not performed.

Sequoyah OSART Crediting Recommendation

Sequoyah OSART Resident Crediting Recommendation									
Resident Program Inspections 25% and 50% Reduction	Inspection Frequency	2018				2019			
		IP Requirements		One-Time OSART Credit			One-Time OSART Credit		
		Sample size	Inspection Hours	Sample Reduction	% IP Samples	Hours Reduction	% IP Hours	Sample Reduction	% IP Hours
IP 71111.22, "Surveillance Testing" (22 samples to 16 samples)	Annual	18	100	0	0%	0	0%	N/A	N/A
IP 71111.05AQ, "Fire Protection" (24 samples to 18 samples)	Annual	16	35	0	0%	0	0%	N/A	N/A
CAP 50% Reduction IP 71152B, "Problem Identification and Resolution"	Biennial	1	250	N/A	N/A	N/A	N/A	0	50%
MC 2515 Maximum Hours Credit (25%/50%)	33.75/125 Total 158.75								
Total Resident Inspection Hours Scheduled, 2018-2019	385								
Total Resident Hours Credited for OSART, 2018-2019	0/125 Total 125								
Total Resident % Credit for OSART, 2018-2019	0%/50%								

Note: Inspection hours are based on the **average** hours provided by the inspection procedure. **N/A** is for the second performance of an annual (one-time credit) and for the year that the biennial not performed.