

SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD: Daniel Merzke,  
 Russell Gibbs

**As of:** 9/10/19 9:38 AM  
**Received:** September 09, 2019  
**Status:** Pending\_Post  
**Tracking No.** 1k3-9c34-ypqt  
**Comments Due:** October 07, 2019  
**Submission Type:** Web

# PUBLIC SUBMISSION

COMMENT (7)  
 PUBLICATION DATE:  
 8/7/2019  
 CITATION 84 FR 38675

**Docket:** NRC-2019-0155  
 Reactor Oversight Process Enhancement Initiative

**Comment On:** NRC-2019-0155-0001  
 Reactor Oversight Process Enhancement Initiative

**Document:** NRC-2019-0155-DRAFT-0006  
 Comment on FR Doc # 2019-16876

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this change. Plants are under economic pressure and more oversight not less is required.

The inspectors seem reluctant to issue substantive cross cutter. Limited research indicates that the last SCCI was issued in 2014.

Inspectors need to inspection modules to focus on the following:

1. PRA adequacy, to ensure it meets the "as designed, as built" condition of the plant.
2. EOP quality.
3. Staffing levels and proficiency of the staff at the station. Not just the operators, but the engineering staff as well.
4. Material condition of reactor vessel internals.
5. Validation that a SCWE is occurring during refueling outages. Generally a "production over safety" mindset takes over the station. More inspectors are needed during refueling outages, as you know the majority of the plant risk exists during outages when RCS inventory is lowered and the containment is not established.

The NRC Performance Indicators needs a substantial revamp.

1. The RCS leakrate PI does not account for un-identified leakage.
2. The RCS activity is evergreen. Foreign material events would be a strong precursor.