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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
SUBCOMMITTEE ON QUALITY AND QUALITY
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UNITED STATES NUCLEAR REGULATORY COMMISSIONERS'
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

FRIDAY, DECEMBER 13, 1985

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION
3 ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
4 SUBCOMMITTEE ON QUALITY AND QUALITY ASSURANCE

5 Nuclear Regulatory Commission
6 Room 1046
7 1717 H Street, N. W.
8 Washington, D. C.

9 Friday, December 13, 1985

10 The subcommittee meeting convened at 8:30 a.m.,
11 Dr. Forrest Remick presiding.

12 ACRS MEMBERS PRESENT:

13 DR. FORREST REMICK

14 DR. CHESTER P. SIESS

15 ~~MR.~~ MR. GLENN A. REED

16 MR. DAVID A. WARD

17 MR. CARLYLE MICHELSON

18 MR. CHARLES J. WYLIE
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P R O C E E D I N G S

DR. REMICK: The meeting will now come to order.

This is a meeting of the ACRS Subcommittee on Quality and Quality Assurance in Design and Construction.

I'm Forrest Remick, Chairman of the subcommittee.

Other ACRS members present today are David Ward, Chet Siess, Glenn Siess, Carlyle Michelson and Charlie Wylie.

Richard Major and E. G. Igne, on my right, are the assigned ACRS Staff members for this meeting.

The purpose of the meeting is to discuss with the NRC Staff such programs as CAT, IDVP, IDI and Readiness Reviews to ensure quality in nuclear power plant design and construction. Further discussion with the Staff is planned to discuss their programs to deal with allegations concerning plant quality at the operating license stage.

Emphasis will be placed on comparing the resources required by the various programs and the effectiveness of the programs, ensuring quality of plant design construction and readiness for operation.

A transcript is being kept of the entire meeting, and it is requested that each speaker first identify himself or herself and speak with sufficient clarity and volume so that he or she can be readily heard.

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1 We've received no written statements from members
2 of the public. We've received no requests for time to make
3 oral statements from members of the public.

4 Do any members of the subcommittee wish to make
5 any opening comments?

6 (No response.)

7 If not, Ted, perhaps you would want to introduce
8 the Staff members that you have with us. You have a copy of
9 the agenda. Is that satisfactory, or do you have suggested
10 changes?

11 MR. ANKRUM: Good morning, Dr. Remick, members of
12 the committee. Thank you for this opportunity. I do
13 believe we'd like to adjust the order of the presentation
14 this morning. We'll start with a series of overviews of
15 initiatives that the Staff has undertaken at the moment that
16 the committee has not heard from before. Then we'll shift
17 into some of the findings and the status of both those
18 programs and the programs the committee has heard about in
19 the past.

20 We'll start off with a presentation from NRR,
21 represented here by Mark Williams, and Dick Brady here, and
22 Jim Knight is also here to answer questions at a later point
23 in time.

24 They'll discuss the allegation tracking system,
25 which is new to the subcommittee.

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1 Then Jim Partlow, who is Director of the Division
2 on Programs within I&E, will give you a brief overview of
3 the inspection program initiatives that we've been working
4 on in the recent past and tell you how we're doing those
5 things.

6 You specifically asked for an update on the
7 findings of the CAT program, and Bob Heishman of I&E is here
8 to give you a status report on the kinds of things that CAT
9 has been doing and contributing to this overall process, at
10 which point in time, we'll shift back and give you a status
11 report of the kinds of things that the IDIs and IDVPs
12 engineering assurance programs and readiness reviews have
13 bene finding.

14 I'll be giving the overview on that.

15 Jim Millhoan here, who heads the inspection teams
16 outdo network. He'll answer specific questions, and there
17 are a number of staff members that are engaged in those
18 kinds of inspections here. We can get into some detail on
19 any of those questions. Once we finish that, that will
20 constitute the formal part of our presentation. We're
21 leaving ample time for you to delve into any area that you
22 find of particular interest.

23 Yes, Dr. Siess?

24 DR. SIESS: That sounds somewhat fragmented. If
25 anybody going to give us an overview and tell us why these

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1 things are being done and what contribution they make to
2 public health and safety or reduction of of core melt
3 probability or reduction of person-rem. You know, the
4 various measures that are being used by the Commission to
5 decide what should or shouldn't be done.

6 The programs as they are, are divided in a number
7 of places. Each of us contributes our piece to the overall
8 picture. We're here to talk to you about each of our
9 individual pieces, and to the extent that we could
10 integrate those, we'll be happy to do so.

11 DR. SIESS: Then each individual person tell us
12 why they're doing it -- because the EDO ordered it or
13 somebody else ordered it?

14 MR. ANKRUM: I think we can all respond as to why
15 we're doing it.

16 DR. SIESS: I have a problem keeping track of
17 these things, in terms of time. There seems to be
18 overlays. Somebody does this. Somebody else comes along
19 and does that. Somebody else goes back and does that.

20 Can somebody give us that picture too?

21 MR. ANKRUM: To the extent we're able to, we'll
22 certainly address that point.

23 DR. SIESS: Now when you say various people have
24 -- NRR and I&E are the two organizations?

25 MR. ANKRUM: They're the two principal players.

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1 I&E being, of course, responsible for the program
2 as it's implemented in the regions.

3 DR. SIESS: Nobody else besides NRR and I&E?

4 MR. ANKRUM: I certainly don't know of any other
5 major players. OI would certainly be involved, in terms of
6 some of the allegations, but that has not, to date, been an
7 item that I think we're prepared to talk about today.

8 DR. SIESS: Do you think that OI investigations
9 have any contribution to safety? Why don't we hear about
10 that too.

11 MR. ANKRUM: I would encourage the subcommittee
12 to invite them.

13 DR. REMICK: Yes. Go ahead, Dave.

14 MR. WARD: I have had a similar subject to
15 Dr. Siess'. There are, you know, a number of different
16 programs here. Each of them are similar, I think, in what
17 they're trying to do. It involves different places or
18 different times. Is there any thrust toward going to one
19 sort of program? Are we going to hear whether you decided
20 that one of these is better than the others, or one is best?

21 MR. ANKRUM: No, you're not going to hear that,
22 because some other programs we're talking about are wrapping
23 up the IDI and IDVP, and we'r shifting into operating
24 reactor kinds of concerns. other programs that we're going
25 to talk about are very much in the pilot stage, and that's

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1 the readiness review. We're going to talk to the CAT
2 program, as we get all the plants to the pipeline. The CAT
3 program is obviously shifting its emphasis over to operating
4 plants and outages at operating plants.

5 So I think we'd have to say, no, we're not going
6 to talk about it in any great detail today, because we're
7 not at the stage where we could.

8 The readiness reviews are very much up at this
9 time.

10 DR. SIESS: Once plants are under construction,
11 of course, there's not much you can do about inspecting the
12 construction, but we find construction errors ten years
13 after a plant's been operating. Of course, if there's
14 nobody constructing, you can't feed that back. I can
15 understand that, but it seems to me we find design errors,
16 again, at all stages, ten years after a plant's been
17 operating or 15, and a lot of designers that we see are not
18 related to the original design. These plants are constantly
19 being redesigned, as you well know. Some are redesigned at
20 the initiative of the utility, some at the initiative of
21 NRC, and so forth. So that process continues. And there's
22 at least one theory in my business that design changes never
23 get the attention that original designs do.

24 MR. PARTLOW: I'm Jim Partlow from I&E. I'd
25 like to address that in my presentation, of where we're

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1 trying to go with our inspection program.

2 MR. REED: Forrest, it seems to me about a year
3 ago, there were points made in open meetings by me, and I
4 think by Ted that the industry had overreacted with respect
5 to quality control and the degree in which it was handled.
6 In other words, they were putting engineering pipes without
7 any real work experience, welding experience or anything
8 like that, into the oversight and approval of quality
9 control, which should have been done by a craftsman.

10 Now I believe you said, in two open meetings,
11 that you're going to produce a letter addressing that
12 industry overreaction and trying to get quality control back
13 into the hands of the skilled people. Subsequently, I
14 called your office. You said that the letter had been
15 delayed.

16 Could you address, in this meeting, the status of
17 that?

18 MR. ANKRUM: Yes. The letter has been prepared
19 and it's in Staff review at this time.

20 MR. REED: It's been a long time, hasn't it? It
21 must have been almost a year now.

22 MR. ANKRUM: Yes. It's had to take its place in
23 a long list of priorities. We have prepared the letter, and
24 it's in Staff circulation at the moment for comment. It's
25 moving on a fast track now. It'll get an up or a down

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1 fairly soon.

2 MR. REED: Well, good. I've been waiting with
3 bated breath.

4 DR. SIESS: There's another aspect we discussed
5 once that could be worked in anywhere, and that was, instead
6 of looking at paper -- you know, what I mean, that's an
7 exaggeration, the preoperational tests startup programs are
8 certainly one way in which errors are found in design or
9 construction.

10 I think I asked once whether those tests were
11 planned to detect errors or whether they were just planned
12 to see if things operated under some conditions or
13 scenarios. I mean, we've had instances where systems have
14 never been tested in their required mode, which might be an
15 offbeat mode, a severe accident-type mode. We certainly
16 find things in preop tests.

17 MR. ANKRUM: If I can expand your question into
18 another area, not just preop testing, but testing of systems
19 after modifications on currently licensed plants.

20 DR. SIESS: That's a little more obvious,
21 though.

22 MR. ANKRUM: Well, Jim Partlow is going to talk
23 to you about some of our inspection initiatives in that
24 area. We've had a couple of trial inspections, and we've
25 had design inspectors, people from the IDI and IDVP efforts,

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1 on those teams. We have found some rather interesting
2 results, interesting in that we're finding that the same
3 kinds of errors that we discovered during the construction
4 process are, in fact, being perpetuated once the plant is
5 operated and you're looking at design changes.

6 We also are finding -- we're looking very, very
7 carefully in this these new inspections at safety system
8 functionality and at the testing associated with those
9 safety systems, to be sure that the testing, in fact,
10 reflects all of the conditions that that system may face.

11 DR. SIESS: You mean preoperative surveillance
12 testing?

13 MR. ANKRUM: I mean -- I'm going to talk
14 specifically now about operating plant modifications to the
15 safety systems, because that's some inspections that we have
16 recently performed and we're very familiar with.

17 DR. SIESS: My question was a little bit
18 different. It seems to me highly unlikely that one of these
19 things can be designed and built without a mistake
20 somewhere. I mean, perfection is impossible. You can go
21 back and check the design and check the QA program for
22 design. You can do the same on construction, and you'll
23 find things that don't work, when you make certain tests,
24 and I was wondering if pre-op tests have been planned, or if
25 not, could they be planned in such a way as to show up these

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1 mistakes.

2 MR. ANKRUM: They're supposed.

3 DR. SIESS: Are pre-op plans reviewed by NRC with
4 that in mind?5 MR. ANKRUM: I can't directly answer that
6 question, because our direct inspection efforts have not
7 been involved in that, but I can say that the pre-op tests
8 are supposed to do that, and I can't say that our
9 inspections now in the safety system functionality area and
10 the outage area are very definitely inspection the test
11 programs to determine whether or not they're testing all of
12 the design features that that plant has to encounter.13 For instance, the valve has to open with a
14 certain delta P across that valve seat, and we want to be
15 sure that the test, in fact, tests that valve with that
16 delta P across it. We've found some very specific instances
17 in the recent past.18 DR. SIESS: That's probably one of the most
19 difficult tests. Have there been instances where the wires
20 were connected backwards and it wasn't discovered until five
21 years later?

22 MR. ANKRUM: Yes.

23 DR. REMICK: Gentlemen, I think we'd better get
24 started. We can save these questions for later.

25 Ted, I suggest you get started. Remember, it's

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1 Friday the 13th.

2 (Laughter.)

3 MR. ANKRUM: In that case, I'd like to pass the
4 baton on to Dick Brady of the NRR Staff, talking about the
5 allegation tracking system that NRR is managing at this
6 time.

7 (Slide.)

8 MR. BRADY: My name is Dick Brady, and I do work
9 at NRR. I'm responsible for the allegation tracking system,
10 or the allegation management system, as it's called. What
11 I'd like to do is just give you a brief presentation on the
12 NRC policy surrounding the management of allegations.

13 When you talk about allegation management policy
14 in NRC, you're generally talking about two things. You're
15 talking about a manual chapter, a set of rules and
16 procedures, that codifies the policy with regard to
17 treatment of allegations, and you're talking about a
18 computerize tracking system.

19 I'm not going to spend much time talking about a
20 computerized system. I don't think it would of terribly
21 great interest to you.

22 (Slide.)

23 I will spend just a few moments talking about the
24 manual chapter and what it says and what we do with regard
25 to allegations. It was put together by the Office of

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1 Inspection and Enforcement, beginning back in the latter
2 part of '82. A small system or set of procedures was put
3 together by that office, to say what the agency's policies
4 would be with regard to the handling of concerns that we
5 received for resolution.

6 And in September of '84, Mr. Dircks put out the
7 draft of that policy guidance. The reason he didn't put it
8 out in a final was that there were two main issues that bore
9 on that. They had not been decided by the Commission. One
10 was the handling of allegations that we received very late
11 in the licensing process, particularly when they came in in
12 great numbers, and what the Commission desired to do
13 concerning the issue of confidentiality. Those people who
14 would come to us with information but desired that their
15 name and other identifying characteristics be kept
16 confidential.

17 Well, the Commission did make those two decisions
18 in March of '85. The issued the policy statement of late
19 filed allegations, and I can talk a moment about that,
20 briefly. And they did issue this last month a policy
21 statement on confidentiality.

22 We have in NRR now the responsibility for
23 finalizing that chapter, in conjunction with ELD, who is
24 giving us some help. Of course, with I&E and the regions
25 and all the program offices, we get their input. We hope
26 to have that done in the next couple of months.

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1 The major policy areas that are covered in 0517,
2 the manual chapter, are these:

3 (Slide.)

4 It establishes in each major office that
5 generally has to deal with the resolution of concerns an
6 office allegation coordinator. The regions each have such a
7 person, and I&E and NRR and NMSS have them.

8 They are designated for some of the smaller
9 offices, but they don't get very many allegations for
10 resolution, quite frankly.

11 People like myself are responsible for the
12 receipt, tracking, and the processing of these allegations
13 to see that they are addressed by the staff, that the
14 allegers are contacted, and that they receive feedback as to
15 what we are doing with their concern.

16 Another major area -- and Mr. Dircks put out
17 several memoranda on this -- is our contact with allegers.
18 The EDO has repeatedly stressed the need to treat the
19 allegers with respect, courtesy, and dignity and that we
20 view the concerns we receive in that manner as a vital
21 source of information that can be helpful to us.

22 The contact with the licensee, as I said, the
23 confidentiality decision by the Commission was just issued
24 last month, and that will be folded into 0517, the contact
25 with the licensee, and this is where we are talking about

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1 if we receive an allegation from an individual and there is
2 no issue of confidentiality at all and there is no problem,
3 say, of a question of wrongdoing on the part of the
4 applicant or licensee, what we will do primarily is turn
5 that concern over to the applicant or the utility for their
6 review. They will make a review. We will ask that they
7 review that concern and get back to us.

8 We will take their report and review it by our
9 staff, and if we agree with it and we think it resolves the
10 concern, we will use it or fold it into a response to the
11 allegor, and we will get back to them.

12 Now, there are two times and two instances here
13 in the contact with the licensee when we don't go to the
14 applicant or the licensee. If there is a question about the
15 confidentiality of the individual, if confidentiality has
16 been granted, we will not go back to the licensee and ask
17 him for that concern.

18 If it is something that can be folded in with a
19 number of other concerns that the licensee or the average
20 man would not be able to tell where the concern came from,
21 we could in some instances do it. Normally, we don't.

22 The other time is that the allegation has about
23 it a concern of wrongdoing on the part of the applicant or
24 the licensee. Obviously, in those cases we can't go back.

25 So in those two areas, those allegations are

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1 covered by the staff themselves. In the wrongdoing area,
2 obviously we have the assistance of the Office of
3 Investigations.

4 The other area that we cover in 0517 is
5 documentation. It is entered into the allegation management
6 system. It is tracked. A hard copy file is kept. There is
7 a hard copy file maintained for each allegation we get.

8 Closeout with the allegor. Here, we are talking
9 about positive feedback to that individual, saying what we
10 did with their concern. We don't always agree with them
11 obviously, but we do have a requirement to let them know how
12 we view their concern, what we did with it and how we closed
13 it out.

14 Those closeouts, they are generally by letter.
15 We send them a report. If it is an inspection report we use
16 to close out the concern, we send them a copy of the
17 inspection report and show them where we address their
18 concern. If it is something that has been worked into an
19 SER supplement, they will receive a copy of that.

20 So that is one concern. One thing we always do
21 is get back to those people.

22 Now, we get a number of anonymous allegations,
23 and obviously we don't feed those back.

24 MR. MICHELSON: Is this process the same, whether
25 it is a major or minor allegation?

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MR. BRADY: Yes, sir.

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MR. MICHELSON: No matter how minor you still go through the whole process?

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MR. BRADY: If we know the individual. Quite frankly, sir, we get a number of allegations that aren't safety significant, but they do fall within something that the NRC would be interested in. We try to get back to these people.

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Now, it may not take an inspection. It may not take writing an SER. It may just take a phone call, which would be documented in the file. It may just take a letter saying we get someone in industrial health and safety, and we try to politely tell them that this may not be something that we need to spend a great deal of resources on. We try to get back to those people in every case.

16

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18

And late filed allegations is the other area that is covered in 0517. These are just the main highlights. I will talk about that in just a second.

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DR. REMICK: Going back to Mr. Michelson's question, is there any screening at all on allegations from the standpoint of putting them aside and either have no bearing upon the activities or interests of the agency or triviality, or must you handle them all in one form or another?

25

MR. BRADY: Certainly, the significance of the

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1 allegation, whether it is very general or vague or
2 insignificant, bears a great part of the time we take on
3 it.

4 If it is something that is not clear, that we
5 can't really discern from a letter or a phone call what it
6 is, we will try to get in touch with that person to
7 understand what their concern is.

8 If it is something that is clearly understandable
9 but is insignificant, you are right, it may not get first
10 priority. We might not work on it first thing Monday
11 morning, but it will be tracked. It will be placed in the
12 system, and as the program manager, I watch those things for
13 everybody in the agency to see that they don't hang on too
14 long.

15 MR. WILLIAMS: Excuse me, Dick. I am Mark
16 Williams, from NRR.

17 There is a screening process in Manual Chapter
18 0517, and it is encouraged that you look at whether these
19 need to be resolved for fuel load or full power. There is a
20 prioritization, and there is a review by the staff for
21 screening of these allegations.

22 MR. BRADY: The specific screen criteria I think
23 we are talking about is in the Commission policy statement
24 on late filed allegations -- I want to talk about that in
25 just a minute -- where we look at the significance of it,

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1 whether it has to be resolved before the licensing. Would
2 it have to be resolved before fuel is on the site? Would it
3 have to be resolved before the low power license? That sort
4 of thing.

5 There is no screening of allegations, I should
6 tell you, with regard to tracking them. We feel a
7 commitment to let the people know that we have looked at
8 their concern, so there is no screening of putting them in
9 the system.

10 A number of the regions -- and I think this is a
11 very good idea, but it is not set down in the policy -- use
12 an allegation review board, in which those allegations are
13 reviewed by a number of technical people in the region,
14 possibly the regional counsel, and they can decide early on
15 that this is not a concern that needs a very high priority
16 placed on it because of the nature of the concern or that
17 this is not something that needs to be handled by an
18 inspection. We can simply explain to this individual our
19 position, and that should take care of it.

20 I might just add a note here that a number of
21 allegations that we get turn out to be substantiated, but
22 many of those substantiations are not terribly significant.
23 Oftentimes, it is just miscommunication. An individual at
24 the site just didn't understand something, and we thought
25 that somebody ought to look at this, and it might very well

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1 turn out to be not a major concern at all. But the concern
2 is substantiated because the individual was right, because
3 he didn't understand what it was he was saying.

4 The next item I want to talk about -- and this is
5 kind of new to me because it was just issued a couple of
6 weeks ago -- is the confidentiality issue.

7 (Slide.)

8 This received a lot of scrutiny by the staff, by
9 lawyers, all of them, and the Office of Investigations and
10 other people had an input into the final confidentiality
11 policy.

12 First off, I would just like to say that it is
13 not something that you bring up immediately when you sit
14 down to talk with an alleger. You don't offer it up front.

15 The Commission views confidentiality, as I
16 believe the Department of Justice does, as a very useful
17 investigatory tool to use when necessary to obtain certain
18 information. If you don't have to grant confidentiality to
19 get that information, you are essentially tying your hands
20 to a written commitment of something that isn't necessary.
21 So we don't always use it.

22 The new policy statement requires a signed
23 confidentiality agreement with the individual. If we are
24 going to observe confidentiality, there are certain
25 restrictions on the individual as well as on the

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1 Commission.

2 If he has -- to be rather absurd about it -- a
3 press briefing the next day and lays it all on the line, a
4 signed confidentiality agreement is obviously of not much
5 use.

6 DR. REMICK: Can I have an estimate of the number
7 of people who request confidentiality agreements, the number
8 of allegeders? What percentage? Is it half? Three-quarters?
9 A small percentage?

10 MR. BRADY: If I were to tie myself to a number
11 on the ones that we have a signed confidentiality agreement
12 with, Mr. Remick, it would be very small.

13 We treat in the staff, quite frankly, we treat in
14 the staff the name of a citizen, concerned citizen, or an
15 allegeder as confidential. We don't distribute it, say, from
16 my office to the technical staff of the project manager
17 unless it is necessary for them to resolve their concern,
18 even without a grant of confidentiality, and as I said
19 earlier, we get a lot of anonymous concerns. So it really
20 isn't an issue there at all.

21 The statement says that the Commission will make
22 its best efforts to protect the identity of a confidential
23 source and that within the NRC, which is what I was talking
24 about, it would only be released on a "need to know" basis.

25 MR. MICHELSON: Is your tracking system going to

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1 be computerized?

2 MR. BRADY: The tracking system, sir, I can talk
3 a few minutes about that if you like.

4 MR. MICHELSON: I don't want all the details. I
5 just want to know, is it computerized?

6 MR. BRADY: Yes, sir.

7 MR. MICHELSON: Who has access to the tracking
8 system?

9 MR. BRADY: The allegation coordinators in each
10 of the primary offices.

11 MR. MICHELSON: Is this set up by a computer
12 security arrangement so that only certain people can even
13 get into it?

14 MR. BRADY: There are certain restrictions on
15 getting into it.

16 MR. MICHELSON: Are these the kind of
17 restrictions that keep you out of them?

18 MR. BRADY: I do not have in the system the names
19 of allegeders, okay?

20 MR. MICHELSON: Where do you find out who the
21 allegeder is then?

22 MR. BRADY: There are hard copy files kept on
23 each allegation.

24 MR. MICHELSON: If you went through the tracking
25 system, is there a code number or a code name that gets you

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1 over to the allegor?

2 MR. BRADY: Each allegation has a specific
3 number. I will talk about the documentation.

4 MR. MICHELSON: And then it is only kept in hard
5 copy?

6 MR. BRADY: That is right, sir.

7 MR. MICHELSON: And in only one place?

8 MR. BRADY: That is right, sir.

9 The allegations are specifically numbered. When
10 you pick up an allegation file and see a number on it, after
11 you have worked with them for a while you can tell which
12 office has the responsibility to resolve that allegation.

13 MR. MICHELSON: And they are the ones that have
14 the hard copy?

15 MR. BRADY: That is right, sir.

16 The confidentiality statement, as set out by the
17 Commission, does have several provisions in it, obviously:
18 when we would have to release the identity by order of a
19 court and the one here that says there are certain
20 exceptions here that I am not totally familiar with, but by
21 order of the Commission.

22 It talks about in this case if an adjudicatory
23 body of the Commission, boards or panels, needed or thought
24 they needed of an allegor to understand a certain concern,
25 the Commission itself would order that that identity be

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1 released to the parties. There is another exemption that
2 generally deals with other federal and state agencies that
3 have a public health and safety job to do.

4 Again, there are provisions for contacting the
5 alleged, saying would you permit us to give the individual
6 your name. If he says no, then we have to go up several
7 more levels to get permission. We can sometimes release the
8 name even without his permission. If it is a matter of
9 public health and safety or some other department, the
10 Department of Justice, says we must have that information,
11 then obviously we do.

12 There are times when we have a written request
13 from Congress for the name of an individual. We advise
14 Congress of our ~~confidentiality~~ confidentiality agreement with this
15 individual. We ask them to honor it. And then we would
16 provide the information.

17 (Slide.)

18 The next thing I would talk about just briefly --
19 I have to apologize a little bit for this slide. I looked
20 at it last night, and it is not exactly what I would like,
21 but it tells you how we got to the policy on late filed
22 allegations rather than what that policy is. But I will try
23 to run through it as best I can.

24 As I said earlier, the policy on late filed
25 allegations was approved in March '85 by the Commission,

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1 published in the Federal Register.

2 We got to that point because on several of the
3 facilities we received very large numbers of allegations
4 just prior to a critical licensing decision, and the staff
5 and everybody had to have some guidance as to how to deal
6 with these concerns that came in at the eleventh hour.

7 The policy statement in its sort of preamble
8 stresses the responsibility of all people to bring the
9 concerns to the applicant or the licensee or NRC as soon as
10 possible, and it does set up, as Mr. Williams was saying,
11 certain screening criteria.

12 The screening criteria, as I understand, are a
13 carryover from screening criteria that were used from Diablo
14 Canyon. They established certain criteria to deal with that
15 situation before the Commission had a policy on it.

16 That was approved in that instance, and then it
17 was carried over in a modified fashion into the present
18 position that we have.

19 It says, essentially, look at the allegation, and
20 if it were to be true, is it something that would have to be
21 resolved before the licensing stage you are about to
22 authorize; in other words, something, as I said earlier,
23 that has to be resolved before the fuel can be onsite; that
24 is, is it something that has to be resolved before low
25 power, full power, et cetera?

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1 There are other screening criteria. What is the
2 likelihood the allegation is true? Does the alleged know
3 what he is talking about? Does it appear that he knows what
4 he is talking about?

5 If these things all come up with a positive
6 indication, yes, we have to resolve it before this decision,
7 yes, it appears credible on its face, then we are bound to
8 review that allegation and come up with a resolution before
9 that licensing decision is taken.

10 DR. REMICK: I understand then, once again, this
11 does not enable you to throw any out; it just sets the
12 priority of when you would pay attention to it?

13 MR. BRADY: That is exactly right, sir. That is
14 exactly right. There are some allegations -- we don't throw
15 any out, but there are some that come in, and not
16 necessarily any more at the eleventh hour but other times,
17 that are just too general or too vague to be of any
18 significance to the staff. They just can't do anything with
19 them. We have those, and we can take our best shot at them
20 and do the best we can with them, quite frankly.

21 If you get an allegation that says, you know, the
22 program stinks, what are you going to do?

23 You can look at your inspection program, and that
24 is all you have done with it. But if that is all you have
25 and you have no name, you have to push on, quite frankly.

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(Slide.)

2 I talked earlier about allegation processing,
3 sort of how it works. An allegation is received by any NRC
4 individual. We have, as I say, allegation coordinators,
5 with the primary offices in the regions.

6 But, anyone can receive an allegation. The NRC
7 employee should get as much information as he can and get it
8 to an allegation employee.

9 The allegation is documented. We enter it into
10 the system. We keep the hard copy files, as I mentioned.
11 One other point. The Allegation Review Board, most regions
12 are using them now and it gives several different
13 perspectives on allegations.

14 They will review it, decide which division or
15 which group in the region, for instance -- I keep sort of
16 picking on the regions. I ought to tell you something up
17 front. Out of a hundred ordinary allegations, probably
18 ninety of them are in the regions, and in the regions for
19 resolution.

20 That's generally because most of the concerns
21 come during the construction phase. They are things that
22 you may have to look at or put your hand on to say this is
23 how it's resolved.

24 NRR resolves some allegations. They're the kind
25 generally where we have to look at the code, or go back and

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1 look at some commitment that was made by the licensee or
2 staff to see if it was met or not met.

3 It's those kind of analyses and evaluation things
4 that the staff looks at, more so in NRR than in the
5 regions. But, most of the allegations are handled by
6 regional staff.

7 DR. REMICK: If the applicant receives the
8 allegation and handles it, need they notify the NRC? And
9 this then comes under the NRC list? Or can they handle it
10 on their own and you monitor what they do with it? How is
11 that handled?

12 MR. BRADY: The latter. There is a body of
13 thought that says the allegation system should have
14 everything in it, that you should put all of the concerns
15 out of 2.206 petitions in it, that you should go through the
16 hearing record and you dump all that in it and anything else
17 you can find, you dump in it.

18 If Fermi has a quality first team or safe team
19 program of resolving allegations, you take all those and
20 dump that into it. That I think is incorrect; I don't
21 support that. Right now, that's not the policy. Those
22 applicants and licensees that have programs for resolving
23 allegations are being reviewed by the staff.

24 You look at the processes. But we don't subsume
25 their allegations into ours. We have an interest in them,

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1 certainly. We have an interest in the procedure for
2 resolving them. We look at them. We do not individually
3 take them on ourselves.

4 MR. MICHELSON: Do you have ready access to that
5 information? You see, what I'm getting at is, if you
6 receive a particular allegation, how do you know that it
7 doesn't fit a pattern of allegations, most of which have
8 ended up with the utility, or whatever?

9 MR. BRADY: To answer your question, we have not
10 had a problem with access to the allegations. Possibly,
11 someone from I&E who knows the inspection business better
12 than I can speak to it...but it's been my experience that
13 the senior resident inspectors have complete and open access
14 to the files.

15 MR. MICHELSON: Are the utilities required to
16 maintain files of these allegations in some organized
17 fashion?

18 MR. BRADY: I want to answer your question this
19 way. The Commission's posture with regard to applicants'
20 allegations programs is right now in a state of
21 development. The Office of I&E is preparing a paper, I
22 believe, that will be forwarded down to the Commission for
23 their review as to what we really should do with regard to
24 the quality first programs, the safety programs and those
25 other programs run by the utilities, to look at allegations

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1 that come to them.

2 MR. MICHELSON: I guess the inference is it's a
3 mixed bag out there as to how well they have documented and,
4 therefore, how readily you can find out what kind of
5 allegations have been given to the licensee.

6 MR. BRADY: I think it's probably a fair
7 statement to say that probably some licensees do a better
8 job of documenting the results of their allegations than
9 others.

10 MR. MICHELSON: In the case of an anonymous
11 allegation, do you put it into your tracking system at all?

12 MR. BRADY: Yes, sir, we do.

13 MR. MICHELSON: Even though, of course, you don't
14 know the source?

15 MR. BRADY: We track the resolution of it even if
16 we don't or can't get back to the individual to let them
17 know what they do with it.

18 MR. REED: I'm wondering if you aren't
19 structuring turmoil in the workplace. We all know that in
20 construction activity, 3,000-4,000 constructions workers,
21 and a good number of them are drifters and bad characters,
22 and we all know that the NRC on the one hand keeps saying to
23 the licensee: tighten up your act. Fire your drugees,
24 discipline this and discipline that. And, yet, when the
25 licensee, we see these reported every day, when the licensee

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1 disciplines somebody, he has now created a potential
2 allegor. He has created a dissident if he didn't already
3 have one in the first place, based on the character of the
4 person that was there.

5 Now, the other part of the NRC says: pay
6 attention to all this. How do you separate the drugee, the
7 dissident, the good-for-nothing, and the activist, even an
8 activist, from the genuine?

9 MR. BRADY: I don't know about the other people
10 who receive allegations and attempt to resolve them, but I
11 personally have no mechanism to determine an individual's
12 motive when he comes to me with a concern. I try to look at
13 them all as being forthright and honest and having a concern
14 that's deeply felt that they would like to have the agency
15 responsible for the public health and safety look at.

16 I do not attempt, and I don't think others
17 attempt to look at the source of the allegation and say:
18 These people are drugees or these people are dissidents.

19 MR. REED: You mean, you don't look back into the
20 record and see if this man was terminated or disciplined for
21 marijuana in the workplace?

22 MR. BRADY: Certainly, there are times when we
23 get into those. Those are generally handled by the Office
24 of Investigations, when a person's background may have a
25 bearing on the voracity of his comments.

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1 But I'm saying we don't disregard those and do
2 nothing with them.

3 MR. REED: That's the basis of my opening
4 comment. We are creating turmoil in the workplace so,
5 eventually, the workplace will accomplish very little.

6 MR. WARD: Dick, could I interrupt?

7 It doesn't look like we're going to get. .

8 MR. BRADY: I'm just about finished, sir, for my
9 part anyway.

10 MR. WARD: But I'd almost accept by stipulation
11 that you have a very comprehensive and disciplined program
12 for looking at allegations.

13 But what I'd hope to hear a little bit more about
14 was the need for the program, your assessment of what it's
15 accomplished. Are you going to be able to tell us? I don't
16 see anything on the last slide. Are you going to tell us
17 anything about the cost of the program to the NRC? The cost
18 of the program to the applicants? And whether there's been
19 any attempt to make some sort of a cost benefit assessment
20 of the program and, in particular, have there been
21 allegations that have identified significant safety problems
22 to which you could really ascribe some benefit?

23 Or, are all the benefits perhaps public relations
24 and political benefits?

25 MR. BRADY: With regard to specific allegations,

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1 I wouldn't want to try to give out the kind of specifics
2 that might endanger someone's private interest or names.
3 But there have been a number of instances.

4 We get a great many allegations. Some of those
5 are safety-significant. Some of those are substantiated.
6 And some of those turn out to be something that we didn't
7 have anything on before as to the cost of the program. And
8 I can give you some examples of those if you'd like.

9 There's some people in jail right now, I can tell
10 you that, because of an allegation that we received, that we
11 investigated it and finally turned it over to the Department
12 of Justice. It was very true.

13 So they're not all, you know, you have to
14 separate the wheat from the chaff. The reason for the
15 expenditure of the funds is because, in there somewhere,
16 there are some valid allegations that we need to know
17 about. I do not have, sir, information on the cost of the
18 program that I'm responsible for.

19 As far as the allegation tracking system, we
20 spend very little money, quite frankly, on the ADP system, I
21 can tell you that. Less than \$40,000. But if you're
22 talking many years, FTD's, contract dollars for resolving
23 allegations, I don't have that kind of information.

24 Quite frankly, it's not within my purview.

25 MR. WILLIAMS: Let me just say a few words. Mark

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1 Williams, NRR.

2 The program has been evolutionary since Diablo
3 Canyon. It's evolved since that time into a manual chapter
4 and formal procedures. The Commission has issued some
5 policy guidance in that evolutionary process. I'm not aware
6 of any real cost benefit analysis that we went through.

7 I think it's clear that there have been safety
8 benefits from the program. And, if not, the outgrowth of
9 the program, once you get these concerns back up to the
10 utility or the licensee.

11 The staff reviewed these for generic
12 implications, and the utility has to review them for generic
13 implications. And I think there are examples, whether it be
14 Diablo or Comanche Peak or Waterford, or some of the other,
15 more normal plants, because those really are outliers, real
16 safety improvements that resulted from the treatment of
17 allegations. The exact number of allegations which resulted
18 in some safety improvement, I think would be a very small
19 number.

20 But, again, it's hard to ignore any allegations
21 that you receive.

22 MR. WARD: Why is it hard to ignore them? What
23 would happen if they were ignored? What do you run into?
24 What if you said, for Plant X, we've got a new policy, a
25 pilot program. We're going to ignore all allegations. What

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1 would happen to you?

2 MR. WILLIAMS: Let me try to talk in terms of the
3 screening criteria. Rather than ignoring the allegations in
4 the screening process, you do resolve on a schedule
5 consistent with the priority of the allegation, resolve the
6 allegation. Rather than ignore it, we resolve it.

7 But we just have not wholesale put a block of
8 allegations aside or submitted it to the NRC staff as
9 concerns.

10 Jim Knight has some experience in resolving
11 allegations on Diablo and other plants, and he can talk a
12 little bit more to our motives for not putting them aside.
13 But we just haven't wholesale ignored a block of
14 allegations.

15 MR. WARD: You see, my problem is he gave an
16 example of an allegation that put somebody in jail, which
17 may be interesting. I don't understand if there's any
18 direct relationship to the Commission and the NRC, which is
19 to protect the public health and safety from radiological
20 accidents.

21 The fact that there is an occasional benefit, and
22 at least occasionally some safety-related problem is
23 identified, that in itself is not enough justification for a
24 program. You know, I could ascribe a safety benefit to a
25 second and third scram system on a reactor. But if it's not

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1 cost beneficial, I wouldn't be very interested in seeing it
2 put on. And I don't think anybody else would, in an era
3 when the budget of the NRC is being reduced; when there's a
4 cap on the total resources, the NRC has to promote the
5 protection of public health and safety.

6 It just seems to me that programs of this sort
7 need to be given the scrutiny of the best cost benefit
8 analysis and I'm disappointed that there apparently doesn't
9 seem to be any move in that direction.

10 MR. PARTLOW: Excuse me. I'm Jim Partlow, from
11 I&E. You know, the protection of the public health and
12 safety is in the eye of the public health and safety.

13 They're the ones that decide whether they are
14 being protected or not. So this matter of let's just forget
15 all allegations when you say: What would happen if the
16 staff got guidance and direction from the Commission to do
17 that.

18 Well, what would happen is that is what would
19 happen. But, Chairman Palladino's draft policy guidance to
20 the staff for FY-86, calendar year '86, speaks to a shared
21 responsibility for safe construction and operation. And the
22 staff is held accountable and signs off. NRR signs off.
23 The regional administrator signs off. The Director of I&E
24 signs off and says that the shadows of doubt have been
25 removed and the plant is ready for licensing.

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1 So when you're put in that seat and the
2 allegations come to you, the ability to say there can't be
3 anything here is a tough job to do.

4 So what the staff is doing in its responsibility
5 when it gets these allegations is, sure, there's some
6 sifting that goes on. The resident inspectors are probably
7 the main ones that have to deal with that. I, here in my
8 job, have received two allegations in two years that I had
9 to deal with. The resident inspector probably deals with
10 many, many more than that.

11 Somebody has to decide and those people after the
12 fact are held accountable. So that's the game we're in,
13 allegations resulting in safety-related changes in the
14 plant. The yield may be only 5 percent, 10 percent, 15
15 percent. I don't know what the number is, but it is greater
16 than zero; it represents shadows of doubt.

17 And the responsible staff is going to look into
18 those things before they say that they're going to sign off,
19 that the plant is ready to license.

20 In terms of the resouces, I can only give you a
21 few numbers. In the last few years, we felt the need in our
22 I&E budget to actually budget with a line that says follow
23 up on allegations and support to the Office of the OI to
24 give them technical support.

25 For example, in FY-85, this past fiscal year, for

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1 following up on allegations, we've budgeted for an extra 17
2 FTE fulltime equivalent people. And we spent something like
3 32.

4 But even that number doesn't capture how much
5 time was spent on allegations. It captures, to the best we
6 can, regional inspectors saying, well, today, I'm following
7 through on an allegation, not doing my inspection procedure.

8 But, really, resident inspectors were really
9 spending much more time than that on allegations. But
10 that's one example of our forethought, what we're able to
11 get in the budget. We're spending almost twice that much
12 this past year.

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1 MR. WARD: When I asked what would happen, sort
2 of hypothetically, if you didn't respond to allegations at
3 all, what I was trying to drive at is: this kind of
4 elaborate program, is it a result of the staff
5 interpretation? Is it a result of Commission guidance? Is
6 it a result of pressure from the Congress, or is it a result
7 of what is written in the atomic energy law?

8 MR. PARTLOW: Yes. My personal view is that the
9 driving force is the feeling of accountability in the staff
10 and management.

11 We don't have any specific direction -- somebody
12 correct me if I am wrong -- from the Commission to do it the
13 way we are doing it. The guidance is rather general.

14 That is my view. It is the feeling of what the
15 job is of the staff.

16 DR. REMICK: If the Commission's regulations on
17 construction were such that there were hold points or
18 certification points where somebody signed off at this
19 point -- we have inspected this and we are satisfied, and
20 you sign -- do you think that would help the staff later on
21 if an allegation came in and said we know there are holes in
22 that concrete? But if that had been a hold or certification
23 point, do you think the staff could have thrown out those
24 allegations, or do you think they would still want to go
25 back and look into it?

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1 Do you know what I mean? Would certification
2 points help the staff not have to go back and reinspect
3 something that was inspected two years ago or three years
4 ago?

5 MR. ANKRUM: There are elements of exactly what
6 you are describing in the readiness review program.
7 Although there is not a formal hold point, there is a
8 presentation of a module of work by the licensee, including
9 their self-assessment of how well they fulfilled their
10 commitments and the regulatory requirements.

11 Then there is a staff review of the licensee's
12 self-assessment in that and a sign-off by the regional
13 administrator once that review is complete as to whether or
14 not we agree with the utility's self-assessment.

15 We in fact have several of those under our belt
16 now, and the one that springs most easily to mind, we found
17 a number of deficiencies -- let me correct that -- the
18 utility found a number of deficiencies in their
19 implementation of the Commission's regulations and their own
20 commitments in their self-assessment.

21 We reviewed all of that work, went back over old
22 inspection reports, made new inspections, and we agreed with
23 the utility's assessment, raised some questions about how
24 the utility chose to resolve some of the issues that they
25 generated. We didn't generate any new concerns as a

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1 result -- concerns, that is, that the utility had not found
2 in their own self-assessment.

3 We did question the way that they resolved some
4 of those concerns. We have a considerable documentation
5 based on that, and the regional administrator accepted the
6 utility's assessment that they had met the Commission's
7 regulations, their own commitments, and the law for that
8 category of work they had assessed, and the regional
9 administrator accepted the assessment and said on behalf of
10 the NRC that the NRC staff accepted that assessment and said
11 we agree with it and we were not going to revisit that
12 particular work unless some new safety concern, about which
13 we had no previous knowledge, were to make itself evident.
14 So we have said in the readiness review that we are not
15 going to go back and look at that work.

16 If an allegation came in at the last minute with
17 questioning records, questioning work in that area, we feel
18 that we would have a very strong basis to assess the
19 validity of that allegation, and it might not be necessary
20 to go back and perform another inspection or another review
21 of records.

22 For instance, if the allegation had something to
23 do with the adequacy of records or if it had anything to do
24 with a particular design that we had dealt with in the
25 readiness review, we would be able to resolve that

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1 allegation without any additional work.

2 That is one of the purposes of the readiness
3 review, is to be able to deal with last minute allegations.

4 Another purpose is to deal with the things that
5 might be wrong with that block of work as early as possible
6 so they don't become last minute issues.

7 Georgia Power tells me that they feel that the
8 program, as it is progressing right now, is doing that very
9 effectively. They are finding things that would not have
10 been found, but they have accepted the last minute
11 allegations.

12 I shouldn't say would not have been found, but
13 have typically turned up at the last minute as last minute
14 allegations.

15 They are resolving those things now, and we are
16 assessing their resolution, and we are also looking to see
17 if any of these things that they are finding have cost
18 cutting implications.

19 What we are finding is that, as Dr. Siess said,
20 there is no such thing as a perfect job. There are errors.
21 But we are finding that they are isolated instances. We
22 have not found anything at that plant yet that would be
23 generic, that would call into question some broad area of
24 the plant.

25 We are finding individual things wrong. We are

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1 finding things wrong. They are turning out to be
2 individual things.

3 They are being corrected, and we think we will
4 have a very firm basis for dealing with any last minute
5 allegations should they arise.

6 DR. REMICK: It will be interesting to see.

7 MR. KNIGHT: Jim Knight, from the NRR staff.

8 Having lived through Diablo Canyon and Waterford
9 and parts of Comanche Peak, we find that in a large number
10 of instances you could argue that in fact a number of the
11 allegations from a pure safety standpoint didn't have an
12 impact on the plant, even those which were substantiated,
13 even those where we caused the utility or the utility took
14 the initiative to go back and do something physically to the
15 plant.

16 Still, I think if you expose it to a hard-nosed
17 cost/benefit analysis we would find it difficult to say,
18 yes, there was in the final analysis the definite safety
19 improvement here if you define safety as the overall
20 function of the plant.

21 If, however, as we must, we are bound to say
22 there are intricate lists of requirements to build a nuclear
23 plant, down to the last piece of hardware, and safety
24 systems and that our mandate is to see that all of those
25 requirements are indeed kept faith with and put into place

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1 and the last piece of paper is there and the documentation
2 of the last cotter pin and self-locking nut is there, then
3 when you went back and looked at the allegations you would
4 say a large number of them were true, a large number of them
5 required someone to do something to complete the regulatory
6 requirements.

7 I guess certainly if we go back and look at the
8 atmosphere which prevailed at the time of the licensing of
9 Diablo Canyon, it was politically and philosophically
10 unacceptable, by any stretch of the imagination, to do other
11 than to take every one of those situations and pursue them.

12 But if there is anything to be gained, we might
13 take a hard look at what are the requirements of the place .
14 and how broadly, how meaningful are some of the quality
15 requirements.

16 DR. REMICK: Thank you.

17 MR. WARD: Okay. I really don't mean to be
18 critical of you gentlemen and your efforts, given the
19 guidance that you have had or the interpretation of the
20 guidance you have made. This is a comprehensive
21 professional program.

22 But, you know, I think there is kind of a
23 philosophical question about the mission of the agency, and
24 it just seems to be most extreme in these programs.

25 Is the mission of the agency to protect the

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1 public health and safety, or is the mission of the agency to
2 satisfy all members of the public that its health and safety
3 is protected?

4 And Mr. Partlow came down very hard on the latter
5 in the statement you made, that your mission is to satisfy
6 the public that its health and safety is protected rather
7 than to protect.

8 So it goes back a ways into the philosophy of
9 regulation, but at other meetings we run across situations
10 where a program that seems to have more direct connection --
11 at least analysis shows it is more directly connected to the
12 protection of public health and safety -- is delayed because
13 of lack of resources, caps on manpower, and so forth, within
14 the agency, and I wonder if this program is subjected to the
15 same sort of analysis that, for example, generic issues are
16 subjected to and prioritized as far as staff resources. I
17 wonder how this would come out.

18 DR. REMICK: Are you pretty well finished?

19 MR. BRADY: Gentlemen, I have finished my
20 presentation, and I wanted to talk about --

21 (Slide.)

22 I have one last slide. I really don't have any
23 comments to add. This slide is just a selection of some of
24 the plants that I think are on the management review
25 report. I believe that is what it is called. And I have

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1 pulled off the names of the plants and some of the open
2 allegations that we have in there in our tracking system.

3 It gives you some idea of the range of the
4 numbers of allegations that we have. There is no sorting
5 here with regard to what is significant and what isn't.
6 These are the numbers of entries in the allegation system
7 that are still open, have not been closed out, as of about
8 the end of November.

9 So it is just a representative sample.

10 DR. REMICK: Have you observed any relationship
11 between those utilities that have a good program for
12 handling allegations and the numbers of allegations that the
13 NRC receives? Is there an inverse relationship?

14 MR. BRADY: I don't have any real good figures on
15 that. I really don't.

16 As I say, the staff is in the posture right now
17 of putting together what will be the recommended policy,
18 working with utilities' allegation programs, our own
19 programs.

20 We have not done any correlation to see if there
21 is a good program at Fermi. Is the number of allegations on
22 Fermi down or up?

23 Sometimes we find -- this is almost an aside --
24 but sometimes we find that the allegations that go to the
25 applicant or the licensee will come to us as well, and they

1 DAVbur are duplicated that way.

2 So we wind up resolving on our own some of the
3 same things. But that has not been a big problem.

4 But to answer your specific question, Mr. Remick,
5 no, I don't have that information.

6 DR. REMICK: Do you have any kind of a gutsy
7 feeling?

8 MR. BRADY: I wouldn't hazard a guess on that.

9 Is there anything else that I might be able to
10 answer about the agency?

11 DR. REMICK: Let me ask a question on
12 clarification. What we are hearing now is basically all we
13 are going to hear on the allegation program, am I correct,
14 Ted?

15 MR. ANKRUM: Correct.

16 DR. REMICK: I will alert the subcommittee if
17 ther are questions.

18 Are the NRR people going to be leaving?

19 MR. ANKRUM: I would like to ask them to stay
20 until we get through the formal part and develop the Q&A.

21 DR. REMICK: Any other members of the
22 subcommittee have questions before we leave this subject on
23 the handling of allegations?

24 (No response.)

25 DR. REMICK: Seeing none, let's proceed to the

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1 next topic.

2 Thank you very much, Mr. Brady.

3 MR. ANKRUM: I would like Mr. Partlow, then, who
4 is Director of the Division of Inspection Programs in I&E,
5 to give a brief overview of our initiatives in the
6 inspection programs area.

7 (Slide.)

8 MR. PARTLOW: Thank you.

9 There were some earlier questions about what are
10 the different programs and the difference between them and
11 who started them, and so forth.

12 So I would like to just take a brief walk through
13 our general inspection program, and I think I will be able
14 to address a number of these things.

15 Has that handout been handed out, Rich? It is
16 about five pages. It is called "The NRC Inspection
17 Program."

18 First, IE did a reorganization almost a year
19 ago. That is the current chart up there now.

20 So I have the Division of Inspection Programs.
21 Richard Branston handles construction and Branston handles
22 reactor operations, and a third branch that handles the
23 other things we do in the area of materials, fuel
24 facilities, medical administration, and so forth.

25 Then in the other division on the other side, it

DAVbur

1 has quality assurance -- that is where Ted comes from -- our
2 vendor inspection program, which you know is now well
3 underway here in Washington, and the technical training
4 center down in Chattanooga.

5 The reorganization did not change Ed Jordan's
6 Division of Emergency Preparedness and Engineering
7 Response. That division is still pretty much the same.

8 So I am going to speak mainly about our
9 inspection program some and how it relates to the division,
10 with quality assurance, vendors, and so forth.

11 The first sheet is just some general objectives
12 of the inspection program. Again, most of this is not new
13 to you. We do feel that we are in the business of verifying
14 compliance as well as evaluating utilities' performance in
15 carrying out the regulatory program.

16 You all know of the acronym SALP, systematic
17 assessment of licensee performance. That is our way of
18 evaluating performance, both in construction, in pre-op, and
19 in operations. That is the SALP program.

20 It seems to be working rather well. Every 12 to
21 18 months a line is drawn on a date, and the staff, which
22 means the regional office as well as NRR and IE, attempt to
23 bring together an evaluation of the utilities' performance
24 in various functional areas.

25 DR. REMICK: If I could just interrupt you a

1 DAVbur 1 minute?

2 Just recently, I was at a meeting where a member
3 of a utility who had intended to be there, who had planned
4 to be there, had to cancel out because he had been informed
5 that there was going to be a SALP evaluation on a certain
6 date.

7 He indicated, he said, well, can't it be some
8 other date? And he was told, no, this is when the SALP
9 visit is going to be; there must be some kind of a visit.

10 So he had to be involved. Then at the last
11 minute the NRC canceled it.

12 But when you say it is working fine, I think some
13 people from the other side have some complaints on that, and
14 it becomes very important on the staff side, when they set
15 it up, that then they can cancel it after making the
16 arrangements.

17 This just happened within the last week.

18 MR. PARTLOW: I bet I know.

19 DR. REMICK: Maybe I shouldn't have said when it
20 happened.

21 (Laughter.)

22 MR. PARTLOW: Often, after the staff has prepared
23 this SALP evaluation, they then meet with utility management
24 to try to make sure they understand it. That is an
25 important part of it, and that shouldn't happen.

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1 As we allocate the resouces that we can allocate
2 to conduct inspection, of course, we allocate them on the
3 type of facility on where the facility is in its life
4 between construction, preoperational testing, startup and
5 operations.

6 Of all the inspection resources that we have,
7 about 90 percent of them are dedicated to power reactors.
8 The other 10 percent are involved in the fuel cycle and
9 materials, and so forth.

10 When it gets down to how much inspection is
11 conducted at each of the plants then, it varies according to
12 those little round numbers that I gave you there upon what
13 the status of the plant is.

14 These are numbers, round numbers for the current
15 fiscal year, FY-86. It shows that our peak time, by the
16 way, for budgeting purpose, the preoperational testing
17 phase, we just call 18 months prior to the projected
18 licensing date, that is the heaviest period of our
19 inspection effort.

20 The construction resident is still on board and
21 some final construction activities are taking place. Our
22 people are there reviewing the preoperational testing
23 program and our people are there reviewing the development
24 of the operational program prior to licensing.

25 It falls off a little bit then in what we call

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1 the startup period. But it still remains larger than it was
2 for construction, and larger than it is for routine
3 operations.

4 We consider that period that we call the startup
5 period to be for about two years. So, the first two years
6 of a unit's operation gets some extra inspection emphasis
7 from us.

8 Then, finally, about 4 FTE per year during
9 operation. Now, again, to remind you, these numbers do not
10 mean that there are four people at a nuclear power plant all
11 year around. These are fulltime equivalent positions.

12 So, for example, this is a combination of the
13 resident inspectors who are on site basically for a 40-hour
14 week, plus a number of different regional specialists, who
15 each go to a plant to contribute in their area. But these
16 are round numbers that we budget for.

17 Now, we try to temper this based upon our best
18 view of the plant's regulatory performance. That's sort of
19 how this SALP program fits in. Our policy is that these
20 general numbers for plants will be modified based upon
21 performance.

22 So that, to the extent we're able to draw the
23 right conclusions about performance, our intent is that a
24 plant with superior performance receives less inspection in
25 the future and the plant with not that kind of performance

1 DAV/bc

1 will get more of that time.

2 So, at the end of a year, when you put together
3 some numbers to show the overall number of inspection hours
4 at various plants in the same status, the numbers are not
5 all the same. In general, they come out. The plants that
6 you might see with the number of SALP category III's, which,
7 of course, is the lower end of the performance scale, have
8 received more inspection during that year than the plants
9 with categories I through II.

10 DR. REMICK: Jim, these are I&E inspections
11 you're referring to. But NRR conducts an inspection on
12 their own. Is that correct? On certain things. I'm
13 thinking of one. There as a recent flap on a
14 post-accreditation inspection that was conducted by NRR.

15 MR. PARTLOW: We try to keep our nomenclature
16 clear. Normally, if it's called an inspection, it's
17 something that the region or IE has done. But NRR is in the
18 business.

19 Jim, of course, knows more about this, but they
20 are in the business of audits, on site audits. These take
21 place in the form in conjunction with their review of an
22 acceptance of a piece of paper of some kind. They often
23 feel a legitimate need to go on site and take a look.

24 DR. REMICK: They're not included in your
25 figures?

DAV/bc

MR. PARTLOW: That's right. So that's going on in the training accreditation area. It goes on on the SPDS systems, control room habitability, those things are going on. But they're not inspection numbers.

The second phase, what I call the three basic segments of inspection again, the resident inspection program -- and by the way, the resident inspection program is generally intending to grow. We now have two resident inspectors, construction resident inspectors at construction sites, where, traditionally, we have had but one from the time that the resident program started in 1978-79.

And we are adding to our resident inspectors in the operations area. Traditionally, our single unit operating sites have had but one resident inspector. In the current year's budget, there are some 37 or 38 of those sites. FY-86, our budget calls for manning of about half of those sites, with two resident inspectors.

Most of the remaining ones would be manned by two resident inspectors in FY-87 subject to how our budget comes out.

DR. REMICK: Those 37-38, were those single unit sites?

MR. PARTLOW: Single units where the plant is in operation.

MR. WARD: If I look in the NRC phonebook, it

1 DAV/bc

1 looks to me like there are two or more residents at each
2 site. Maybe I'm interpreting those data incorrectly.

3 MR. PARTLOW: A couple of things on that. Of
4 course, the secretaries are listed. Each site has a
5 secretary assigned on at least a part-time basis.

6 So, again, you go by the budget and the plan.
7 Every site would have from one to three resident inspectors
8 by budget, by policy, assigned to it. In a number of
9 regions, there is a general move to put more people on
10 site. IE does not object to that. If the region wants to
11 take one of its budgeted resources for a regional inspector
12 and spend that FTE with an additional resident at some site,
13 we allow him to do that.

14 A second thing that you're seeing going on is we
15 are hiring more young, relatively junior people. They are
16 not full-fledged, qualified resident inspectors, but the
17 regional administrators think that when we first bring them
18 aboard, it's a good opportunity to send them out to the site
19 in sort of a training assignment for six months to a year.

20 So they're also probably listed.

21 MR. WARD: Thank's. I appreciate the
22 information.

23 How long does an operating plant resident
24 inspector stay at a given site? I know it's a relatively
25 new program. What's your philosophy there?

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MR. PARTLOW: A couple of things.

2 We have no fixed tour for the resident inspector
3 so that resident inspector stays there as long as he wants
4 to, as long as the agency doesn't have any other burning
5 position that they feel they must have that fellow in. And
6 as long as we remain satisfied through regional management
7 that he is remaining effective in his job.

8 I would hesitate to say what the average tour is
9 these days. I suppose it's at least three or four years.
10 Once a person goes to a site as a resident inspector, we try
11 to encourage them to move. They're a heck of a resource.
12 We want them at headquarters. The regional offices want
13 them. But we have no fixed time limit for how long they can
14 stay.

15 DR. REMICK: That's a change, isn't it, in
16 philosophy? Didn't at one time you purposely move them
17 after a fixed time?

18 MR. PARTLOW: Yes. We worked through having a
19 fixed tour policy, primarily because of the objectivity
20 issue. And they are very much by themselves out there.

21 But that was abandoned. And we decided that as
22 long as we were confident that he was still objective in
23 that climate, he could stay there if he wanted.

24 DR. SIESS: You had a problem with relocation
25 expenses, didn't you? Did that get resolved?

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1 MR. PARTLOW: There were some new Civil Service
2 rules put through in the last year or two, which, if
3 implemented, would ease the burden of relocation -- moving
4 services, and so forth. So that's law.

5 But, then the second step is that it's very, very
6 expensive to the extent, as I understand it, that the agency
7 wants to adopt those provisions, fine, provided they pay for
8 it out of their budget.

9 And I believe that EEO has that in the '87-'88
10 budget. But I don't have any details. A source of some of
11 the questions, let me get to the bottom half of these three
12 basic segments of inspection.

13 Overwhelmingly and routinely, traditionally, our
14 inspections are carried out by the regional offices. But,
15 in the past years, there's been a turn towards inspections
16 being conducted directly out of headquarters, out of the
17 Office of Inspection and Enforcement.

18 So that has grown up with the various acronyms
19 that you have heard of CAT's, PAT's, IDI's, and I've got a
20 couple of new ones to add to it today.

21 There are various reasons, I guess, for each of
22 them. And I have a number of them listed here. First, as
23 you know, several years ago, the Vendor Inspection Program
24 was brought in because the vendor situation is a national
25 situation as opposed to a regional situation.

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1 The licensee is located within the region, so
2 that program has been brought here. It's been reoriented
3 towards utility responsibilities to a large extent, but
4 that's the subject of a whole different discussion.

5 Yes, sir?

6 MR. REED: I notice that recently, a
7 reaffirmation or rehash of the Vendor Inspection Program
8 came out as a policy paper. I guess it's out for comment at
9 the end of February. It was more or less rewritten the same
10 as it was before.

11 I, of course, believe that the whole structuring
12 is wrong. And I was very interested in the Lloyd hearing
13 that just took place, where one of the people brought in in
14 front of Congressman Lloyd, I guess, made a strong pitch for
15 the airworthiness certificate type of structuring in
16 nuclear.

17 But the vendor should be made responsible for his
18 design, and some of his key manufactured goods, so on and so
19 forth, as is done in the aircraft situation.

20 I'm a little disappointed to see that the vendor
21 program is not planned to be changed. In other words, the
22 responsibility of the vendor for this product that he is
23 putting off on the sole licensee remains pretty small; his
24 responsibility is pretty small.

25 Therefore, the encouragement for doing a good

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1 job is not strong.

2 Is there any trend that you're detecting that
3 we're going to make the vendors at least liable and
4 responsible for everything that they ditch off on to the
5 sole licensee?

6 MR. PARTLOW: I can't speak very specifically to
7 that program. I guess we don't have anybody here in it. I
8 did just recently read the Commission on Enforcement Policy
9 on Vendors. The Commission, I guess, reaffirmed.

10 MR. REED: That's the one I meant to refer to.

11 MR. PARTLOW: Reaffirmed that we would hold
12 enforcement conferences, that we would issue deviations to
13 vendors. And that if they were not responsible in the Part
14 21 manner of reporting their defects, that we would take
15 civil penalty enforcement action.

16 MR. ANKRUM: To go to your broader question,
17 Mr. Reed, this is something that was examined in the QA
18 report to Congress as to whether or not we should license
19 vendors, and particularly NSSS, whether we should change
20 from this policy of holding the licensee responsible for the
21 action to the vendors.

22 And the decision which was approved by the
23 Commission was that we would not change that policy. So
24 there is no move afoot at this time to change the basic
25 notion that we hold the licensee responsible and, in turn,

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1 should hold his vendors responsible.

2 We're not considering licensees.

3 MR. REED: If you haven't read that Lloyd
4 hearing, you might want to read that.

5 DR. SIESS: Ted, have you followed the gestation?
6 What is the role of a vendor inspection?

7 MR. ANKRUM: The role of a vendor inspection is
8 to confirm whether or not the utility has fulfilled its
9 responsibilities in auditing the vendors. The vendors do
10 still retain. They have a Part 21 legal responsibility and
11 we also verify whether or not the vendor is properly
12 discharging its Part 21 responsibility.

13 DR. SIESS: In terms of whether the utility is
14 auditing the vendor, do you find that out by inspecting the
15 vendor?

16 MR. ANKRUM: That's correct.

17 DR. SIESS: All the utility audits are on file
18 with the vendor, everybody he sold something to. I mean,
19 here's a vendor selling valves and the valves are good
20 enough that 20 people have bought them.

21 MR. ANKRUM: We will generally audit both the
22 utility and the vendor. But the focus of our audit has the
23 utility fulfill its responsibilities vis-a-vis that vendor.
24 And we'll look at some vendor-specific items such as:

25 Has a utility implemented the service information

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1 bulletin?

2 DR. SIESS: It seems to me you would get that by
3 inspecting the utility. I just haven't got the picture of
4 what you find out from the vendor about what the utility
5 did.

6 MR. ANKRUM: We are inspecting both. When we go
7 to the vendor, we will discover whether or not the utility
8 has been there and then what the utility might have done,
9 actions it might have taken vis-a-vis that vendor.

10 We'll get a cross-section of what different
11 utilities may have done at that vendor. But the focus of
12 the inspection is in terms of who is responsible for taking
13 action to the utility.

14 DR. SIESS: Not when we have an incident like
15 Salem or Davis-Besse, or San Onofre. We now have
16 investigation teams going out to find out where the system
17 broke down.

18 Is there anything like that in connection with
19 the vendors? Has there been a similar study of where the QA
20 program broke down on TDI diesels?

21 MR. ANKRUM: Most recently, yes. Our vendor
22 inspections to find something more than an isolated
23 instance. We'll be looking at that particular vendor and
24 trying to determine why that system broke down at that
25 vendor.

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I'm not sure if we did it on TDI, and I'm not totally familiar with all of these areas, so I'm giving you a little bit of an ad hoc answer.

DAVbw

1 DR. SIESS: That seems to me to be a perfect
2 example of where the system broke down. Obviously poor
3 quality equipment was supplied. I had heard that there had
4 been vendor inspections of TDI over a period of years that
5 showed defects in their QA program, not necessarily defects
6 in their equipment, I gather. It seems to me that incident,
7 I'll admit, seems to me as important as what happened at San
8 Onofre, in view of the importance of on-site AC power.
9 There was a big accident. I just wondered if there's been
10 any reports on it. What happened.

11 MR. ANKRUM: We agree with you that we need to
12 get to the bottom of these vendor-related issues and that
13 we, in fact, are dealing with those things now. That's one
14 of the things that would happen to the program at
15 headquarters, but I don't believe that we produced a
16 vendor-related report related to the TDI diesels, but again
17 that's not a program I'm directly responsible for.

18 MR. REED: Let's go the other halfway where Chet
19 was talking. Let's go beyond equipment design. We now have
20 some incidents up there that point to design
21 vulnerabilities. In my opinion, the utility is being asked
22 to do something beyond their capability as sole licensee, to
23 be able to say that a design doesn't have vulnerabilities
24 and that it's appropriate. It seems to me that in order to
25 get to that other half beyond equipment, I think that

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1 perhaps QA audits in these kind of things can work on
2 equipment and achieve something, but when you get to the
3 complexity of design and design frailties, it seems to me
4 that there's a gap in the system. That's where the
5 airworthiness certificate comes in. You've got to begin
6 with design that doesn't have vulnerabilities. And I don't
7 see who is addressing design vulnerabilities.

8 Utilities, I don't think, should ever have been
9 expected to have the total know-how to do that.

10 MR. ANKRUM: I certainly agree with several
11 aspects of what you're saying. In our recent design
12 inspections, of course we have continued to hold that
13 utility responsible for the adequacy of that design. That
14 is the law. That is the regulation, and we have, indeed,
15 found that some utilities didn't have the ability to provide
16 the kind of technical oversight of what their contractor was
17 doing. And they were dependent on that contractor's QA
18 program or that contractor's technical review program.

19 We've also found some utilities that did have the
20 kinds of technical background to be an informed customer.
21 One recently completed IDVP for a plant, which we believe,
22 if you look at the three participants, the owner, the
23 utility, the AE and the contractor performing the IDVP on
24 behalf of the utility, all three showed that they were
25 really doing a professional job, and we're very pleased

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1 with how well the design had been done, and one of the key
2 reasons that we attribute to the fact that the design was so
3 well done is the customer. The customer utility had
4 significant technical credentials in the area and was a very
5 informed customer and was able to clearly judge what it was
6 buying and what we have in the thrust of these inspections.

7 The lessons learned are that the utilities under
8 the current regime, which would hold the utility
9 responsible, the utilities are going to have to increase
10 their technical capability to become a more informed
11 customer.

12 MR. REED: In other words, to become designers,
13 so they can then design their own stock. The designers
14 don't know enough and will never learn enough how to do it,
15 so that the utilities can do their thing? Quite frankly, I
16 think the structuring is wrong. You know my feelings.

17 MR. ANKRUM: I know your feelings, but as the
18 structure currently is, in order to work as best as it can,
19 the utility has to be an informed purchaser, and that means
20 they have to have the technical credentials to assess what
21 they're getting.

22 MR. REED: That's a reversal of all the history
23 of creation and manufacturing and selling, and so forth.
24 You're going to make nuclear something different.

25 Do you think that will hold up in the future?

DAVbw

1 I don't agree with that.

2 MR. ANKRUM: We definitely do think nuclear is
3 something different.

4 DR. REMICK: Ted, refresh my memory. The QA
5 Report No. 1055, did that address the question of whether
6 the Commission could license vendors? Does the Act enable
7 them to do that?

8 MR. ANKRUM: The report itself does not deal with
9 that.

10 DR. REMICK: Do you happen to know? I assume
11 that's been looked at. Would the Act enable the Commission
12 to license vendors, if it wished, or does the Act
13 specifically say they should license the facilities.

14 MR. ANKRUM: I don't know the answer to that
15 question.

16 MR. MICHELSON: Don't they license vendors in the
17 case of the floating barge-mounted plants, and so forth?
18 They were licensed for manufacture without specific
19 customers.

20 DR. REMICK: You're right. A manufacturing
21 license; yes.

22 MR. MICHELSON: It must permit it in that case
23 for that kind of thing.

24 DR. REMICK: I think we'd better proceed.

25 MR. PARTLOW: Let me go ahead quickly with some

DAVbw

1 more kind of inspection activities that go on from IE
2 headquarters about the construction appraisal team. Those
3 are continuing. The construction appraisal team will, of
4 course, be phasing out here over the next year. The
5 performance appraisal team will continue. These program, I
6 think, serve us in a number of ways, and I've tried to list
7 some of them there.

8 You know, the regional offices have both NRR and
9 IE resources out there working for them, doing licensing
10 activities and doing inspection activities. The way
11 decentralization is going, is it, primarily those regions
12 are responsible for carrying out IE and NRR programs in
13 accordance with the headquarters programs policies with the
14 resources that we give them. So one of the responsibilities
15 then is for the program offices to be able to assess how
16 well the regions are doing with those resources.

17 So in construction, the construction appraisal
18 team and an operations appraisal team and other kinds of
19 inspections that we do gives us the opportunity to take an
20 independent look at a utility and draw some conclusions,
21 some recommendations about how effective our regional
22 inspection program is operating.

23 DR. REMICK: How many of those PATs do you
24 conduct a year now?

25 MR. PARTLOW: The performance appraisal team now

1 DAVbw

1 is running on the order of three to four. I might mention
2 that the Commission, in its restart order for TMI Unit 1,
3 ordered two PAT inspections during the next year at TMI Unit
4 1.

5 So that's a part of our schedule. The
6 construction appraisal team, Mr. Heisman here is able to
7 stay on the road all the time, and he's running with one
8 team almost at the five per year rate, I guess. Those are
9 major inspections.

10 DR. REMICK: Which one was that? I'm sorry.

11 MR. PARTLOW: CAT construction appraisal.

12 DR. REMICK: I notice one of the items you have
13 here is monitoring of INPO effectiveness. I have not heard
14 any criticism of I&E interaction with INPO. Has there been
15 some recently, as there's been recently between NRR and
16 INPO? Has there been any clashing here that I'm just not
17 aware of?

18 MR. PARTLOW: I really don't know yet. The NRR
19 case has to do with those kinds of situations where the
20 agency decided not to issue a rule. For example, in
21 training or in maintenance, in favor of what INPO was
22 doing. Therefore, NRR has a greater need, perhaps, to draw
23 plant specific information from someone like INPO about how
24 is it going on that area. I&E, the IE situation is not the
25 same. We made a decision several years ago not to increase

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1 the number of performance appraisal team inspections. We
2 had plans to have three teams every three years. In
3 recognition of the somewhat equivalent INPO evaluation
4 program, we decided not to do that. But in order to see how
5 it's going on, how INPO is doing in those things, we don't
6 necessarily have to get a lot of plant-specific
7 information.

8 DR. REMICK: Do you feel that has worked out
9 where you limit your PAT inspections to three or four per
10 year and monitor what INPO is doing in their evaluation
11 assistance business? Has that worked out?

12 MR. PARTLOW: It seems to be; yes.

13 Another area, and Jim Milhoan is here to answer
14 any further questions later on, that we're in, is the
15 conduct of independent design inspections. It's an area
16 that's reasonable for centralization within IE, because of,
17 again, it doesn't have nice, clean regional boundaries like
18 utility licensees do, and we're able here to maintain
19 through our own staff and through contractuels, a corps of
20 design experience people to conduct those programs.

21 DR. REMICK: Will that continue when new plant
22 construction stops, or will IDIs then be directed towards
23 major plant modifications?

24 MR. PARTLOW: I'll let Jim get into this later
25 on. The conduct of the big IDI, the conduct of the IDVP

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1 utilities conducting independent design verification
2 programs is, of course, going ot end, but the way we're
3 going in IE programs, I think we'll get more into the kinds
4 of ideas that Mr. Reed was talking about.

5 I'm going to talk in a few minutes about design.
6 Headquarters also does direct inspection activities in such
7 things as fire protection and equipment qualification. I
8 guess there in these kinds of things, I would say, that our
9 intent is, when there are issues that are rather
10 complicated, that requires some technical help, that are
11 still developing, in how to conduct the right kinds of
12 inspections, that we tend to start them in headquarters with
13 teams and go to a few plants in each region to get started
14 on the right kind of long-term inspection program and then
15 go with plans to sort of farm that out to the field and to
16 get out of that business, once we've developed the kind of
17 inspection program that we want, that's going on now in
18 equipment qualification.

19 MR. MICHELSON: In the case of fire protection,
20 have you reached the point where it's been regionalized?

21 MR. PARTLOW: No. And I guess until each plant
22 has had its major Appendix R inspection, that won't happen,
23 as long as we continue to want to use NRR resources and our
24 contractors will be running that from headquarters.

25 MR. MICHELSON: Are you going to do it on a

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1 plant-by-plant basis, in terms of turning over the region,
2 or are you just at a certain point in time going to turn
3 over all fire protection over to a given region?

4 MR. PARTLOW: We're basically doing it
5 plant-by-plant. By virtue of participating in this
6 inspection, the region becomes clearer on the issues that
7 are identified, and they pick it up from there.

8 MR. MICHELSON: Have any of them been turned over
9 to the regions yet, any planters?

10 MR. PARTLOW: A number of them have had this
11 initial Appendix R inspection.

12 MR. MICHELSON: Has the responsibility been
13 turned over to the region in some kind of a formal way?

14 MR. PARTLOW: I guess there's a memorandum that
15 says, here are the potential enforcement findings that
16 developed from this inspection, and we understand that
17 you'll be following through on those.

18 MR. MICHELSON: Thank you.

19 MR. PARTLOW: On the next page, general
20 attributes of inspection program. I'm not going to go
21 through all this, but I thought it might be some interesting
22 numbers that you might want to have, things about the
23 general amount of time that a regional inspector is away
24 from home. It runs 40 percent and over on a month-in,
25 month-out basis.

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1 Our resident inspectors, we feel good if they can
2 get in about two-thirds of their time in what we call direct
3 inspection activities. We have goals out there for covering
4 off-shift. We have budgeted goals that allow our inspectors
5 to conduct what we call independent inspection efforts to
6 pull the string on areas that they see that are of
7 potential safety significance, that they want to learn more
8 about.

9 DR. REMICK: Are you familiar with some utilities
10 having an indicator of basically nonconformance reports per
11 hour of inspection time? Is that anything that you track,
12 accumulate or anything like that?

13 MR. PARTLOW: Violations?

14 DR. REMICK: Yes.

15 MR. PARTLOW: Yes, we periodically put those
16 together, normalize them on a per-inspection hour basis;
17 yes.

18 DR. REMICK: Apparently, they include in that
19 resident inspector, inspection time, as well as QA people.
20 Apparently, you must publish how much at each site, how much
21 time a resident inspector spends in inspection.

22 MR. PARTLOW: Yes. Every inspection report
23 contains the number of hours that the inspector was on site
24 conducting inspection activities, so they can get it. The
25 report has their violations in it and how many hours.

DAVbw

1 DR. REMICK: Apparently, some track number of
2 violations per hour of inspection.

3 MR. PARTLOW: Yes. Inspection program plans and
4 trends. This is what I wanted to talk a little bit about,
5 where generally we're trying to go with our inspection
6 program.

7 I had mentioned the increased use of resident
8 inspectors, both in construction and at operating sites.
9 The use of a major team inspection as a diagnostic is
10 gaining more and more popularity.

11 I won't try to snow you with the talks of
12 synergism, and so forth, that comes from bringing a team
13 together, but that kind of thing does work, when you bring
14 together the right number of people and don't get too many
15 people and have a good team leader with them on a two- or
16 three-week inspection. There is synergism that starts to
17 work, if we got the right people together. So more and
18 more, I think you'll see us moving towards the conduct of
19 team inspections.

20 Bob Martin, in Region 5, has it in his plans.
21 Every plant gets a major team inspection every year.

22 MR. REED: But this is what goes on in SALP
23 inspections. This is what goes on in INPO inspections.
24 Their team inspections, you're saying, you're going to
25 duplicate, triplicate other team inspections?

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MR. PARTLOW: First, the SALP is not an

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inspection. Nobody goes on site for a SALP. SALP is

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sitting down at the table and bringing together everything

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that's known about the past year's worth of inspections. So

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SALPs are not inspections.

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MR. REED: I guess the discussions are team

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efforts?

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MR. PARTLOW: Yes.

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MR. REED: They always seemed like inspections to

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me because the SALP efforts onsite have always been

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extensive. I guess their minds are already made up; that

7

is, the discussions with management are very extensive.

8

Okay, let's go back and hang my hat on INPO team

9

inspections.

10

You are saying you are going to be doing

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something like the INPO team inspections?

12

MR. PARTLOW: I am saying that I think, as

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opposed to seeing our inspection program being only

14

throughout the year, one guy out this week and two guys out

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next week and one guy out the week after that, we will still

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see that, but we will see more of the periodic team

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inspections going on as well.

18

MR. REED: I would like to point out something.

19

In my opinion, the HP man, the chemistry man, the expert in

20

this event discipline going out on his scheduled arrangement

21

is much less burdensome to the facility. If you are going

22

to go out in teams, that blocks up everybody right away.

23

The utility is going to say, hey, I can't have

24

this happen during the refueling or during a major

25

situation. I can't divert all my key management. Team

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1 inspections are very difficult to plan for, and they can be
2 burdensome.

3 MR. PARTLOW: I agree.

4 By the way, when I speak of these kinds of team
5 inspections in general, I am probably not including the
6 health physicists, the security inspectors, and so forth.
7 Those will still probably be going out on more of an
8 individual basis.

9 But the kind of places you put together a team is
10 when you go looking at some kind of inspections that we are
11 doing now at headquarters and in some of the regions. It is
12 more of a system functionality look where you are looking at
13 a system or you are looking at a major program, like the
14 maintenance program associated with the system.

15 MR. REED: Me thinks thou dost plan to inspect
16 and do inspect too much. It is not in the best interest of
17 safety, in my opinion, if it sounds like it is just a
18 ballooning activity.

19 DR. REMICK: These team visits are not PAT team
20 visits; that is to evaluate the region, is that correct?

21 MR. PARTLOW: The PAT is again a headquarters
22 activity limited to three or four per year. I am talking
23 about the general method in which we utilize the 400 or so
24 inspectors in the five regional offices in a year's period
25 of time, how they go about their duties.

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1 So I am telling you not that we are going to keep
2 doing all the regional individual inspections that we have
3 done in the past plus team inspections, Mr. Reed. I am
4 telling you that they might be grouped in a different kind
5 of unit.

6 MR. REED: The issue is man-hours of inspectors
7 on the jobsite, and I know most of that is tracked and I
8 know what the curve looks like, and quite frankly, I think
9 that activity has gone beyond an optimum or efficient
10 point. It is just diluting the attention of those key
11 personnel on the jobsite. INPO contributed a hell of a lot
12 to it.

13 MR. PARTLOW: You mentioned INPO and the team
14 inspections. We don't want to go all to team inspections.
15 INPO does a team inspection where their people are onsite
16 for two weeks. It happens once every 16 to 18 months. We
17 don't run that kind of program.

18 Our program is more of an NRC presence throughout
19 the year.

20 MR. REED: Yes, I think the resident inspector
21 program is very good, and I think certainly some of the
22 resident inspectors are very down to earth, workplace
23 coupled, workplace knowledgeable people.

24 I have heard complaints from some residents that
25 they are not listened to as much as they would like to be

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1 on up the line in regional headquarters and in headquarters
2 in Washington. I am not sure whether they are listened to
3 on a balanced basis or not.

4 I thought when the resident program started way
5 back that there would be some lessening from the other
6 programs, but along comes INPO with a great big activity,
7 which -- I shouldn't call them inspections. They are called
8 evaluations -- but they are recognized, certainly by the
9 burdened ones in the plant, as inspections.

10 But I thought there would be a lessening with the
11 listening. They are there with their ears to the keyholes.
12 I would think that rather than increasing inspections you
13 should be looking at what is the optimum and where does
14 motivation and distracting fit in?

15 DR. REMICK: I do think it is fair to say, Glenn,
16 that if it had not been for INPO E&A visits, inspections,
17 there would be more PAT inspections. That was the intent of
18 staff a couple of years ago, but they purposely curtailed
19 the number of those, recognizing the INPO E&A inspections.

20 MR. REED: I realize that.

21 MR. PARTLOW: I do want to key back again to our
22 intent by policy from the top that good performance will
23 result in less inspection. That is our intent. And poor
24 performance will result in more inspections.

25 DR. REMICK: Where do we stand on our

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1 presentation here?

2 MR. PARTLOW: For the kind of things for the
3 future, down here in the middle of this set of bullets, the
4 development of an outage inspection program aimed at
5 ensuring that modifications and repairs do not degrade
6 safety margins.

7 We are starting, we are in the middle of a pilot
8 program there now at that Fort Calhoun plant, and we are
9 starting at the Dresden plant.

10 The idea there is to look at the modifications
11 that are conducted during an outage period, tie those back
12 into the quality of the design work that was conducted in
13 planning for those modifications, the change in the original
14 design basis, the original design assumptions, then taking
15 next a look into the actual quality of the conduct of the
16 modification, the welding, the installation, and so forth,
17 next into the post-modification testing of the program. Is
18 there functional testing conducted that still demonstrates
19 the operability of the system?

20 So that is another area that we are getting that
21 does not represent our intent that it represent increased
22 inspection but another, a different way of using our
23 inspection resources.

24 MR. REED: This outage inspection program is
25 being generated, and we are going to be asking for a

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presentation on that sometime. Would you be the proper --

2 MR. PARTLOW: Yes, that is us.

3 MR. REED: We want to find out if this is going
4 to be beneficial or whether it is going to be just more of a
5 burden?

6 MR. PARTLOW: We are scheduled on either January
7 or February full committee on the status of the outage
8 inspection.

9 MR. HEISHMAN: February, I think, is the latest
10 date.

11 MR. PARTLOW: The last bullet, development of
12 realistic uses of PRA in the inspection program, that is
13 another thing we are working on with several regional
14 offices.

15 Again, the basic thesis, an inspector can look at
16 just so much. So what is the general priority for his time,
17 this system versus that system, this maintenance evolution
18 versus that maintenance evolution?

19 So we are working now to use, to the extent that
20 we have plant specific PRAs, to provide -- to take from
21 those guidance to the resident inspector or the regional
22 inspector to help him determine the most important things
23 from a risk point of view for him to look at for the time
24 that he has available.

25 MR. WYLIE: Just a question you skipped over --

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1 or maybe I didn't recognize it -- but the next to the last
2 bullet down there, additional emphasis on utility
3 responsibility.

4 MR. PARTLOW: Really, there I just meant sort of
5 the same discussion that we had had on the vendor inspection
6 program. The vendor program, where traditionally was a
7 little bit of QA on the vendor site, is now turning more to
8 the utility and its responsibilities.

9 MR. WYLIE: This is a particularly important area
10 here, as you well know, particularly since a lot of quality
11 vendors are out of the business and they are having to
12 procure replacement parts from other sources. Quite often
13 those sources are not the highest quality vendors because
14 the high quality vendors got out of the business.

15 I know from being on the design side of the house
16 we had to face this problem. You mentioned earlier Part 21,
17 and quite often when you talk to people who got out of the
18 business, one of the things that put them out of the
19 business was the fact that their legal people told them the
20 business is going to decline to a level where it is not
21 worth the risk to stay in this business from a legal
22 standpoint.

23 That is what put them out of the business, and
24 Part 21 has that threat to the corporate structure. It is a
25 real problem because the committed high quality vendors have

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1 gotten out of the business, and when you go out to look
2 utilities like sort of a package or a guaranteed job that
3 somebody is going to take complete responsibility to qualify
4 the product and have a paper trail along with it.

5 They will do that for a price. Generally, that
6 price is four times what it is worth. But in the end you
7 may end up with an inferior product that you could have
8 gotten and still can get from these vendors that are still
9 manufacturing these items but are not willing to take the
10 risk under the present regulations.

11 That is a problem, I think, that the industry is
12 going to face more and more because they have to face up to
13 dealing with.

14 Now, here I think you are perfectly right under
15 the present regulations that the utility -- it says it is
16 his responsibility and his problem, and he may have to
17 participate more in the qualifying of that equipment. There
18 has got to be some mechanism by which he can get the best
19 piece of equipment, the highest quality piece of equipment,
20 and then take the responsibility to see that it is properly
21 qualified, even if he has to do it himself.

22 MR. PARTLOW: There should be some kind of
23 economies of scale there. Not every utility should have to
24 go through some kind of special acceptance test on a piece
25 of commercial equipment in order to responsibly dedicate it

1 DAVbur 1 to a safety-related job.

2 MR. WYLIE: I know many pieces of equipment where
3 the manufacturer has gotten out of the business. He still
4 produces that same item for the commercial market. The only
5 problem is he is not going to do it to get in the business
6 because he has to have the paper trail along with it.

7 MR. PARTLOW: I won't go into details on the last
8 sheet. It is just a little advertisement for what IE is
9 responsible for.

10 DR. REMICK: Thank you.

11 (Laughter.)

12 There is one thing. The CATs will be phased out,
13 so I think information on the resources that is required is
14 not pertinent. But PATs will continue at three to four per
15 year.

16 Is that right? Is somebody going to give us an
17 idea of the resources that requires?

18 MR. PARTLOW: The performance appraisal team will
19 continue. It may not always be the same. It is changing.

20 In fact, the resources, the people who normally
21 conduct performance appraisal team sections are now
22 conducting what we are calling a safety system functional
23 inspection.

24 We did this at Turkey Point. Perhaps you have
25 seen the results of that inspection several months ago.

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1 We were at Pilgrim last month, and we will be going off to
2 another plant next month.

3 So the concept of a performance appraisal team at
4 IE headquarters will continue. The menu, what they do, is
5 going to change.

6 DR. REMICK: But you still see three to four per
7 year?

8 MR. PARTLOW: At least.

9 DR. REMICK: You mean it is growing?

10 MR. PARTLOW: I would say that it might grow, the
11 number of resources at headquarters. Although the budget
12 probably calls for six people, I suspect I am using more
13 like eight people right now. The headquarters' direct
14 inspection effort is going to continue like that.

15 DR. REMICK: When you say "people," that is
16 FTE's?

17 MR. PARTLOW: Yes.

18 DR. REMICK: Now, my understanding of IDIs, the
19 regular IDIs are going to phase out, but there are going to
20 be operationally oriented IDIs. So somewhere along the line
21 somebody is going to tell us about the resources that we
22 have utilized there because that is a program that we will
23 be continuing in some form?

24 MR. ANKRUM: Instead of performing IDIs, for
25 which we are responsible and which are a block related to

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1 design types of activities all by themselves and inspection
2 reports all by themselves, that effort is being moved into
3 what I will call a subcontract to the safety system
4 functional reviews and to the outage inspections, the design
5 aspects of outage inspections.

6 So the IDIs and IDVPs and engineering assurance
7 programs are winding down, and we are becoming a
8 subcontractor to these major Division of Inspection
9 Programs' inspections.

10 Jim, what are we budgeted for that?

11 MR. MILHOAN: For example, we are going to still
12 maintain or try to maintain a contractor capability and a
13 design expertise as we go into the new program when we go
14 into a different contract. So we will be able to do the
15 contract selection process for that with respect to the
16 resources at the present time.

17 As Ted was saying, we are winding down the other
18 programs. We still have to go into the NTOL plants. So we
19 have resources devoted to that in the engineering assurance
20 programs and the IDVPs.

21 Normally, for an IDVP program, from the design
22 inspection capability, normally I would have one team leader
23 plus one designer type person in each of the major
24 disciplines covered by an IDVP, which is normally mechanical
25 system, mechanical components, structural, electrical,

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1 instrumentation, and control.

2 The inspection effort associated with that is
3 normally visiting for program approval for the IDVP program,
4 scope approval, looking at the checklist review, conducting
5 an implementation inspection about midway through an IDVP,
6 reviewing and inspecting the documentation associated with
7 an IDVP written report, and then inspecting corrective
8 actions associated with the IDVP.

9 Those are inspection efforts, and I normally run
10 a team of people for each one of those phases, normally
11 about three days for a scope checklist review, about a
12 one-week inspection of that part of the IDVP program, and
13 about a one-week inspection associated with the
14 documentation associated with the IDVP report and the
15 corrective actions running from the program, the engineering
16 assurance program, which is a self-directed utility-run
17 program, the scope being approximately the same as an IDVP
18 except the utility is running a self-directed program with
19 our overview. I would expend about the same amount of
20 resources, again, on a team basis with those major
21 disciplines covered.

22 Some of the engineering assurance programs have a
23 module approach to it, such as the South Texas engineering
24 assurance program run by Houston Power & Light, which has a
25 number of modules associated with that. My inspection

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1 resources on that one I would say are about one-half that of
2 an IDI.

3 And these programs are coming to completion.
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DR. REMICK: How many of them are there out there? I guess some plants have been exempted.

MR. MILHOAN: The present plan in the I&E inspection program, we've just completed the Millstone engineering assurance program. At the present time, under that review, I have the Nine-Mile Point to engineering assurance program, the completion of the Hope Creek IDVP, the South Texas Engineering Assurance Program, the designs aspects of the readiness review. And the design aspects of the readiness program.

We have a letter out at the present time asking Beaver Valley what their plans are with respect to additional assurance on the design of their plants.

I am also heavily involved in design teams with the design adequacy program at Comanche Peak. That has taken a lot of my resources. Again, that program will be coming to completion.

I will be devoting a rather significant amount of resources to that part. And in the coming years, as Ted was saying, we have design teams associated with the average inspection program. That team is normally, again, comprising a person who can assist with the mechanical components, electrical and instrumentation and control, along with a design team leader, one which has normally had IDI experience as a team leader on that one.

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1 We've gone through the Fort Calhoun inspection
2 and we are now in the trial program. I'm spending right now
3 about three direct inspection weeks in the field on that
4 type of a program. I also have design members as part of
5 the safety system functional inspections.

6 And I'm also supplying numbers to the vendor
7 inspection program on certain designs; if there is an
8 inspection going on that requires design expertise, on a
9 case by case basis, I am supplying design members to that
10 kind of program for specific problems.

11 DR. REMICK: How big is your branch?

12 MR. MILHOAN: In the design aspect, my section
13 has approximately six...seven FTE's devoted to design, plus
14 myself.

15 MR. ANKRUM: Significant contractor support.

16 MR. MILHOAN: We're not looking at that increase;
17 we're looking at the trend. It's shifting the emphasis over
18 to the operating side.

19 DR. REMICK: So am I correct that the various
20 programs you talk about are design-related? You have seven
21 FTE's plus technical assistance under contract.

22 MR. MILHOAN: That's right.

23 DR. REMICK: What's roughly the magnitude of that
24 contract?

25 MR. MILHOAN: I'm hesitant to give you a money

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1 number, but I've got two contracts -- an IDVP contract and
2 an IDI contract. In FTE's, I would say that the two
3 contracts from FTE, they will be about eight to 10 FTE's.

4 DR. REMICK: Questions?

5 (No response.)

6 MR. ANKRUM: If I might, that constitutes the
7 formal part of what we were prepared to present today.
8 We'll be happy to respond to questions in any of these
9 areas.

10 DR. REMICK: I suggest that we take a break at
11 this time and then come back and ask questions. Why don't
12 we take a 15-minute break, until 11 o'clock.

13 (Recess.)

14 DR. REMICK: Could we reconvene, please?

15 Ted, I'm not sure we've gotten what we were
16 hoping to get from the presentation. I think we were hoping
17 that we could find out which of these programs are cost
18 beneficial from the standpoint of improving public health
19 and safety, improving safety.

20 And I realize that's a very difficult thing to
21 evaluate.

22 MR. ANKRUM: What you have seen is an exercise on
23 the old premise that if you can't answer the question that's
24 being asked, answer a question that you can answer.

25 DR. REMICK: Yes, I understand.

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MR. WARD: That was frank.

(Laughter.)

DR. REMICK: I come out of this feeling that you're saying that all of these programs are good and are worthy of continuation. Some are being phased out because there's no longer a need. Some are in transition. But I guess we don't have any feeling on which ones of these, if any, are worth the expenditure of resources.

In fact, I don't think we have a real good feeling as to what those expenditures are. I personally feel that, in the case of the allegations, I'm not sure how the Commission gets out of having to respond in a manner to what you probably are doing.

And if I put myself in your shoes, that I've got to be the one signing off, I certainly want to have some kind of a logical answer documentation that allegations have been handled properly.

I don't know how you get away from that, unless there is some kind of a certification program, individual office directors and the Commissioner are willing to stand up and say once we do that, we'll no longer accept allegations on these points.

The other, I guess I personally don't have a feeling. Maybe other members of the subcommittee got a feeling out of this, that there are one of the other, or all

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1 of these programs are programs that we should encourage to
2 continue, or some of them should be terminated.

3 I don't think we've come to that bottom line
4 based on the presentation. As you say, it's a very
5 difficult question. And one you haven't tried to answer.

6 MR. ANKRUM: That's because we haven't come to a
7 bottom line conclusion as a staff either.

8 DR. REMICK: Can the staff afford to continue all
9 these programs? Has it thought about integration of
10 programs into one or more that are more important than
11 others?

12 MR. ANKRUM: I think that's exactly what is now
13 happening. We are integrating the design inspection
14 efforts, which would formerly stand alone, into an operating
15 reactor program for outage inspections and for safety system
16 and functionality inspections.

17 So we are integrating them. The readiness
18 reviews on the construction side of the house are
19 integrating a number of things that were being done
20 individually in an attempt to get out in front of our
21 problems.

22 As I said, in the three modules that we have
23 accepted and, by the way, that represents the first time the
24 NRC has incrementally accepted a complete construction for a
25 project at the Vogel project. We have specifically stated

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1 in our letter of acceptance that absent new information not
2 previously available to the Commission, we will not revisit
3 these areas.

4 So the door is open for an allegation obviously.
5 But we feel that our review has been of sufficient depth
6 that if an allegation comes in and says the whole QA
7 documentation program is not functioning properly, well,
8 we've looked at that. We can answer that right away. We
9 can say, yes, because of our review of the QA program and
10 the readiness review, it was functioning properly and we
11 don't need to go back and look at that again.

12 If an allegation comes in and says: the welding
13 on the pipe at such and such a location was not done
14 properly and, therefore, the adequacy of the whole welding
15 program has been called into question, this is what the
16 allegation says, we can go back and say: We're going to
17 investigate that weld...I shouldn't say "investigate".
18 We're going to go look at that well, but we've already
19 assessed the adequacy of the entire welding program and we
20 don't need to do that again.

21 So the readiness review is also an integration
22 and an attempt to get out ahead of these problems and float
23 the allegations to the surface as early as possible as well,
24 because the readiness review programs are open to the
25 public. The utility is exposing a considerably greater

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1 depth of detail to the public review process than has ever
2 been the case in the past. And we are advertising in
3 advance that when we finish our review, our intent is to put
4 this issue behind us.

5 And one would hope then that, if there are any
6 allegations that anybody has in their hip pocket, that
7 they'll come forward at that point in time; because we're
8 better off not having to deal with this issue.

9 DR. SIESS: If you get 50 allegations on the
10 welding program, then that would call into question in the
11 public's mind, since you mentioned public called into
12 question the adequacy of previous review, which said
13 everything was fine.

14 I mean, I could challenge anything you come up
15 with with allegations.

16 MR. ANKRUM: If we found we had 50 allegations
17 and we substantiated all 50 allegations, and if all 50
18 allegations that were substantiated dealt with the adequacy
19 of the program we had previously signed off on, then you'd
20 say we, the staff, did a lousy job of signing off on the
21 program.

22 DR. SIESS: I wouldn't say it, but somebody else
23 might. The question there is substantiating. You've still
24 got to investigate everyone.

25 MR. ANKRUM: If they are specific. If they are

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1 less than specific and talk about a program kind of an
2 issue, if we've looked at that program, then we don't need
3 to reinvestigate that.

4 MR. REED: Forest, this is not an allegation.

5 DR. REMICK: Well, I have one question on *
6 allegations. That's part of that. Go ahead, Glenn.

7 MR. MICHELSON: If we're still on allegations,
8 we've been of course hearing from time to time about various
9 difficulties with the TVA program at Watts Bar and
10 elsewhere. I thought maybe at this meeting we were going to
11 get a little bit of the background that might apply. But I
12 didn't hear Watts Bar mentioned specifically, or Sequoyah.
13 Is that going to be covered somewhere else then?

14 DR. REMICK: We did not ask the staff
15 specifically.

16 MR. MICHELSON: Oh, we don't want to get into
17 that at all here?

18 DR. REMICK: Not necessarily because this is more
19 general. We do not become plant-specific.

20 MR. MICHELSON: That takes care of my question
21 then. Thank you.

22 DR. REMICK: Dave.

23 MR. WARD: Just a quick one I want to ask Jim. I
24 think Jim made a good point. It seemed good to me anyway,
25 that the allegation program is probably not very fruitful as

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1 far as turning up any significant safety issues. But, it
2 is, he said, necessary because of legal requirements. Just
3 a quick question.

4 Your point was that if someone wants to address
5 the problem, that that's the place to address it. But are
6 these requirements in the regulations, or are they
7 requirements in the law, federal law?

8 Or are they even lesser?

9 MR. KNIGHT: I would categorize a lot of the
10 types of things that we've seen substantiated, if you will,
11 for want of a better terminology, as kind of secondorial
12 requirements. Certainly, you have Appendix B and it has
13 certain requirements. It says you will have documentation
14 and this type of thing.

15 And, very frequently not taking debate with the
16 requirements of having such a program. But then there has
17 evolved a number of interpretations, a number of...I guess
18 I'd call it standard practices. Expectations might be
19 another term you might use...when we have very frequently
20 had an allegation that the utility made a commitment to you
21 that they were going to comply with Standard X, Y, Z and
22 subparagraph 5 on page 16 of that standard says maybe some
23 general statement. And they didn't do that.

24 And there are a lot of these things. You know,
25 it sounds a little manipulative, but there are an awful lot

1 DAV/bc

1 of these things. The fact of the matter is they did make
2 that commitment to us. In a matter of practice, we have
3 held people to whatever that requirement was.

4 If it was pointed out to us that they didn't do
5 it, we're going to have to go back and say you didn't do it
6 and start looking into what does that mean. Very
7 frequently, you find it didn't mean much at all.

8 If you look again at Diablo Canyon, if you look
9 at Waterford, if you look at Comanche to a certain extent,
10 you find an awful lot of our time, energy and resources were
11 expended explaining why, this, that or the other thing,
12 although it wasn't exactly what it was supposed to be,
13 didn't mean anything.

14 The whole point is if that's your experience,
15 it's time to go back and look at what those requirements
16 really are, and why are they in place in the first
17 instance. It's not an easy question because the reverse of
18 that is to probably just let a lot of these things go. And
19 then you've lost control.

20 Finding that middle ground is very difficult.

21 MR. WARD: But the type of requirement you're
22 talking about is not something that is at a level of law or
23 regulation, but it's the staff practices. I mean, it's
24 an ad hoc requirement that the staff has put on.

25 MR. KNIGHT: No. As I say, there is a licensee

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1 commitment. And I started to say there will be a chain.
2 They make the commitment.

3 MR. WARD: Okay, it's a licensee commitment.

4 MR. KNIGHT: The law says you will use the
5 standards appropriate to the purposes.

6 DR. SIESS: When the licensee commits to a
7 standard, that means he's committed to every single word in
8 it. Does it follow that the specificity of what you're
9 testing against...I've never seen a standard that didn't
10 have some things that were specified precisely and because
11 when you write it down, that's the way you have to write it
12 down. And the guy who wrote it knew if it was 10 percent
13 more than that, it didn't make any difference. But you
14 can't say that.

15 Now, you can get an allegation -- there are
16 thousands of them -- that something didn't comply strictly
17 with the standard.

18 MR. KNIGHT: And a great percentage are exactly
19 that.

20 DR. SIESS: An outstanding example, a very simple
21 one, is Waterford, the allegations that the concrete was in
22 the mixture for 31 minutes when the specification says 30.

23 MR. KNIGHT: That's certainly typical of many.
24
25

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1 DR. SIESS: There was a violation of a
2 specification one which had absolutely no bearing on the
3 integrity of the plant or the safety of the public.

4 Now there's a problem with enforcing that kind of
5 prescriptive, specific type thing. Usually in anything but
6 the nuclear business, the enforcement is tempered with
7 judgment by people who have judgment and by people who can
8 exercise judgment.

9 Now for some reason NRC can't do that, it seems,
10 without an awful lot of formality in the process.

11 MR. KNIGHT: I can only agree with you.

12 DR. SIESS: Why can't we do it?

13 MR. WARD: Why not? The NRC, I believe, has
14 people who are more capable of exercising that judgment.
15 What's in the way of a simple rational system?

16 MR. KNIGHT: Somehow we fail to institutionalize
17 that, I guess. I'm not sure how you go about doing that.
18 Maybe as something of an aside, but it might be indicative
19 of an atmosphere that persists that makes it difficult to
20 exercise judgment.

21 I couldn't help but notice in a recent meeting in
22 Bethesda just a couple of days ago that the number of
23 investigators between OI, OIA, Congress, and such,
24 outnumbered the reviewers. I think they had something like
25 6 to 3 or something like that.

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1 DR. SIESS: Would you like to comment on a number
2 of lawyers?

3 (Laughter.)

4 MR. KNIGHT: There was parity there, only three
5 of them.

6 MR. ANKRUM: Dr. Siess, let me add, though, that
7 in the design instructions, we exercise exactly that kind of
8 judgment, and we feel we have the flexibility to exercise
9 that judgment. We exercise it in the specific findings. We
10 have a number of observations or findings, and we will
11 disposition those, and we will describe how we disposition
12 them. And we exercise our abilities in doing that.

13 DR. SIESS: I believe that's true. I've seen
14 that in a number of cases. The process of getting to the
15 exercise of that judgment seems to be extremely involved and
16 time-consuming and resource consuming. There had been
17 instances where a stress calculation has been challenged,
18 and it seems that everybody goes through the stress
19 calculation four times before somebody looks at the bottom
20 line that says the stress is only half the allowable, and it
21 doesn't make any difference anyway, which the designer
22 probably knew when he did it, if he knew what he was doing.

23 I agree, I think, in the design area, there have
24 been many, many good examples of the judgment being
25 executed, but only after such a formal complex procedure and

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1 series of questions. I look at some of the design reviews
2 on the seismic design and the questions are invariably 99
3 percent on the method of analysis, as if somebody believed
4 the method of analysis.

5 You know, people can sit and argue about the
6 analysis for years, yet it's the design that's important,
7 the end product. Maybe the reviewers are all analysts, I
8 don't know. Sometimes they've called in consultants to help
9 the analysts ask questions on the analysis. It's just that
10 the process seems to be more involved and more
11 resource-intensive than the benefits.

12 MR. ANKRUM: We apply a standard to ourselves
13 that we require the utility to follow, and that is, that
14 when engineering judgment is used in the design, we require
15 that the basis for that engineering judgment be documented,
16 that we set down the reasons for having exercised that
17 engineering judgment, so that at some time in the future, if
18 that decision or that component has to be modified or
19 revisited in some way, there will be a basis in the
20 documentation for that. We apply the same standards to
21 ourselves. If we are going to disposition a particular
22 finding, if we're going to say, when we reanalyze this, we
23 find it within the design margins, we feel it incumbent upon
24 ourselves to set down the reasons why we would be willing to
25 accept it, which is the same standard we expectr to use.

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1 There's a lot of formality, and there's something
2 to be gained from that, as well.

3 DR. SIESS: But is the gain in safety or is the
4 gain in something else?

5 MR. ANKRUM: The gain is in auditability of what
6 we have done and what the utility has done in their case.

7 DR. SIESS: I guess what I'm trying to get at,
8 and I'll admit that nobody knows how to do a PRA
9 incorporating design and construction errors, except if they
10 are already incorporated in the data base, whatever that may
11 be, but I often wonder, if I did a PRA on the plant as
12 designed and as built, with no IDVP, IDI, CAT, or whatever,
13 and a PRA on the design, after it had been reviewed
14 extensively, would I find any significant difference in the
15 risk, as measured by person-rem, at \$1000 a person-rem or
16 reduction in core melt probability. You know, the kind of
17 things you're taking now as safety goal type bottom lines.

18 If the answer is, I wouldn't find any difference,
19 I ask why are we doing this, there must be some other reason
20 than the health and safety of the public that I'm doing it.

21 It may be the credibility of the NRC. I don't
22 know how to put a dollar value on that. This is the kind of
23 question that comes up. I went through Diablo Canyon,
24 thousands of allegations, not only allegations, but things
25 that were discovered, hardly a one of which would have

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1 affected the ability of that plant to withhold an
2 eartrhquake.

3 MR. ANKRUM: We have found errors or changes
4 needed in designs that would definitely affect safety system
5 function. And those changes have been made, and how they
6 would have affected the person-rem or dollars per
7 person-rem, ultimately, in the PRA. I can't tell you, but I
8 can tell you we have definitely found errors that affected
9 safety system functionality.

10 DR. SIESS: I'd like a couple of examples, if
11 somebody could think of them, but even so, there's an
12 incremental benefit in finding those after the plant goes in
13 operation. There will probably be an equal number found
14 from operating experience. Now that we've learned to look
15 at operating experience to find out what's not best about a
16 plant, and again, I think there has to be a question as to
17 whether that incremental improvement in safety was worth the
18 effort or could we just as well wait and depend on operating
19 experience to show it up, because obviously, the process
20 we're going through now does not lead to perfection. It
21 does not find all the mistakes that have been made. We
22 continue to find mistakes of one kind or another, as the
23 plant operates.

24 MR. ANKRUM: Let's use Davis-Besse as an
25 example. Operating experience allowed us to find out that

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1 certain valves couldn't be operated with a differential
2 pressure across that, that they had, and the unfortunate
3 thing is that operational experience, we got that right in
4 the middle of an accident, an accident on its way to
5 happening.

6 DR. SIESS: But ACRS had been asking that
7 question for about 10 years, as I recall, about valves that
8 open and close under differential pressures, under abnormal
9 conditions. Salem showed us, you know, that shunt trip was
10 a lot better than undervoltage trip on breakers.

11 MR. WYLIE: I'm not sure Salem showed it. It
12 always has been.

13 DR. SIESS: It showed NRC that, no, we learn
14 those things, and you say, yes, it's nice to learn them from
15 incidents that don't have any effect on the safety of the
16 public. There's always the possibility that we'll learn it
17 only from some incident that does, but my point is that the
18 process only reduces that probability, it doesn't eliminate
19 it. If we want perfection, you're not going to get it by
20 the process we're going through.

21 MR. WYLIE: I'm not sure you'll ever get it.

22 MR. WARD: Not only will we not get it, you don't
23 need it.

24 DR. SIESS: We shouldn't need it, and I hope we
25 don't need it. There's nothing I've ever been involved with

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1 in design that we assume is going to be perfect. We always
2 try to design things, so that they work, even if they're not
3 perfect, or at least they don't kill anybody.

4 MR. WYLIE: That's right. You've got the margins
5 built in to take care of it. Just in the electrical area
6 alone, you've got, for a typical plant, at least a half
7 million terminals. Just probably tells you you're not going
8 to get them all right. And you're going to have to pick
9 them out by your testing programs that are designed to pick
10 those out, such as you mentioned earlier, your pre-op
11 tests. Pre-op tests turn up a lot of that kind of things,
12 and thank God, we've got the pre-op tests to qualify them.

13 DR. REMICK: I think we've gotten off
14 allegations.

15 Glenn, you've been waiting very patiently.
16 Please.

17 MR. REED: Inspections. I think I've probably
18 run the total gamut of almost no inspections to lots of
19 them, having been involved in Yankee Rowe. I'm trying to
20 draw a picture, and see if it may answer some of Chet's
21 questions. See if we can't, from the picture, try to figure
22 out what we're doing wrong.

23 Yankee Rowe, I think, we'll have to agree, I
24 think is one of the most successful nuclear power plants in
25 the United States. It probably has had, for its lifetime,

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1 the fewest trips, the fewest plucked steam generator tubes.
2 Among the best performance, 25 years of operating history.
3 And I can just keep on naming it, and yet was a pioneer
4 plant. That should have given it a disadvantage right away,
5 because the state of the art wasn't there.

6 Now what caused Yankee Rowe to be such a success?
7 Was it inspections? No. I was there. There never was NRC
8 inspection, construction by anybody whatsoever, at all, of
9 Yankee Rowe. Was it operating inspection in the early days?
10 Heck, no. There were never any to speak of. In fact, I
11 remember the first inspector that ever came there, probably
12 after one or two years. His name was Reilly. One of the
13 tough guys. And we had a lot of discussions.

14 So how come Yankee Rowe, and if we get down to
15 audits and paper, you can't go to Yankee Rowe and find all
16 the paper you want. You're not going to find any paper
17 trail. All you'll find is success.

18 Now I'm going to say that Yankee Rowe was done by
19 stand-up people of quality for the state of the art at the
20 time, motivated, inspired, to do their work without being
21 clubbed every day.

22 Okay. Now what have we got as a picture? What
23 we have is -- and I might point out that Yankee Rowe was
24 built in the construction phase with a max number of people
25 of 500 or less. Okay. Now what do we have? We have ten

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1 times as many people on the job site, 5000. And there you
2 lose control right away, and you have ten times as much
3 paper. I was going to say 100 times as much paper trails,
4 and all these kinds of things. Maybe 100 times or at least
5 ten times as many convincers, floggers carrying whips,
6 diverters, and all these kind of people at hte job site,
7 clubbing away and diverting.

8 Now I'm not going to say that in the NRC,
9 enforcement and inspections for honesty and trend are not
10 necessary. Those are very necessary to establish the
11 integrity of the organization, their ethics, their honor, to
12 do a job, but when we continue to proliferate inspections
13 and proliferate inspections, are we achieving the purpose?
14 I don't think the record's going to tell you that. The
15 record will tell you that Yankee Rowe achieved the purpose,
16 and these other plants coming along now have got all kinds
17 of allegers, inspectors, windmiller and people running
18 around in circles like with their head cut off, diluting the
19 effort. And decoupling is the scene of the day. That's the
20 picture of today.

21 Attention is so diverted, and those good inspired
22 ethical, motivated, good old days are no longer in evidence
23 at the job site.

24 All right. What have we got? Somebody was just
25 mentioning the number of people that were at some meeting

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1 or something. We'll say they were the diverters rather than
2 the contributors.

3 I think that's what's happened in the nuclear
4 workplace. The diverters are now outnumbering the
5 contributors, and the contributors have lost their
6 motivation. So how do we do that?

7 You've worried me this morning by talking about
8 more inspections. I'd like to think about less inspections
9 by wise people, who understand the workplace.

10 Now I want to give credit to one program of
11 inspection. That was the resident inspector program. That
12 was good. I didn't think it was going to be when it was
13 hatched, and I think the plant I was at was the first plant,
14 one of the first plants that had a resident inspector. It
15 so happened that they picked a wise person who knew about
16 the workplace. He didn't go hysterical when he saw his
17 first wrench or screwdriver dropped on the floor. I really
18 think the resident inspector program is more the key to
19 success.

20 In fact, if you go back to inspectors at Yankee
21 Rowe, the only inspectors we had were the old-time
22 inspectors like Hartford Steam Boiler, and those kind of
23 basic insurance inspectors. Those kind of things that have
24 been going on for years with stand-up people who knew their
25 jobs in the workplace without a sheet of paper and without

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1 a check-off list. They had judgment. The thing that was
2 just mentioned. I don't know. I think that we desperately
3 need the inspection activity in NRC, because I know that
4 there are management people out there and leaders of
5 industry out there which circumvent and do all kinds of
6 things, but I think we've gone amok. We've just
7 proliferated the whole thing with noncontributors and the
8 inspectors.

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MR. PARTLOW: Mr. Reed, I can't speak to how well Yankee Rowe came out in construction without inspectors, but let me mention a few things.

We are adding additional resident inspectors to single unit operating sites. They are at about half of them this year and hopefully at most of them next year. One plant that is not going to get an additional resident inspector is Yankee Rowe.

I am perhaps speaking when I shouldn't, but the NRC management meeting with regional managers, and so forth, was held in Philadelphia last week. They were speaking about how to use the people and the resources that we have to address problems. What they discussed was the top performers in each region, and was there a way to really do what I said, reduce inspection at the top performers and use those people where our problems are?

As I understand it, one regional administrator in Region 1 said he had one plant where he believed he could take the inspection program down to one resident inspector and that the regional inspection program could consist of that resident inspector, when he sensed something wrong in some area like security or health physics, calling the region for a special inspection. It was Yankee Rowe.

MR. REED: Let me interrupt and say I believe in the resident inspector program. I have said before I don't

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1 think the headquarters and regional headquarters are
2 listening enough to resident inspectors.

3 I also believe -- I know how unfortunate and how
4 much of a problem it is -- that resident inspectors should
5 be rotated. I believe that you have got to learn how to
6 walk in the trenches before you should tell the trenches how
7 they should function.

8 I believe that you have the key in the resident
9 inspector program because you -- let's say you assign a man
10 for five years. I wouldn't assign him less than five years
11 before I said you come to headquarters because we need your
12 judgment to temper all these wild things that are going on
13 here in the front office.

14 Now, this problem is not unique to NRC. Big
15 companies have the same problem. They have lots of good
16 plant personnel out in the steam plants, but they never
17 promote them out of the plants to where all the windmilling
18 is going on in the front office.

19 I really think the resident inspector program is
20 the key to something, but you ought to always be thinking
21 about how many periodic inspectors and headquarters people
22 are running in and out of this facility, and can we cut them
23 down?

24 Now, you said you are going to cut down the
25 periodics and specialty inspectors at Yankee Rowe?

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1 MR. PARTLOW: Again, I want to make sure it is
2 clear what I said. At a management meeting, the regional
3 administrators, the EDO, Harold Denton, and so forth, Jim
4 Taylor, they discussed the use of the inspection resources
5 we had and how to address them to what our most serious
6 problems are.

7 What came back again was the theme that I
8 mentioned before of taking inspection resources off of the
9 top performers as best we are able to identify the top
10 performers, and I am only telling you that Yankee Rowe was
11 apparently mentioned as a place where that could happen.

12 MR. REED: I used Yankee Rowe as an example. I
13 don't know whether it is any good any more after I left
14 there or what.

15 (Laughter.)

16 DR. REMICK: Chet, you had a commnt.

17 DR. SIESS: I keep seeing ratings of plants. I
18 know the regional administrators have come in and given the
19 Commissioners a list of trouble plants. I read this in the
20 newspaper, I think, and I read the daily reports from the
21 regions, and I read the PNOs, which tend to indicate who is
22 having problems.

23 There are certain plants that I never see on
24 those lists. I almost forget they exist. Monticello,
25 Kewanee, and Point Beach I hear about every once in a

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1 while. Fort Calhoun, Duane Arnold, they never show up on
2 these lists.

3 Is there some reason?

4 I have never seen ratings that put those plants
5 in a different category, but there are obviously some plants
6 out there that are running along pretty smoothly.

7 Has anybody looked into why they are doing so
8 well?

9 I think one reason is they are small. They have
10 probably got a tenth as many valves as some of the newer
11 plants do. I don't know.

12 I mean, SALP, I don't think -- I think it is a
13 good enough measure of how much your inspection effort
14 should be, considering the objective of the inspection
15 program, but SALP doesn't measure these other things.

16 Am I wrong about those plants? Do you know
17 something bad about them that doesn't get into the paper I
18 see?

19 MR. PARTLOW: Thank God, most of them are in that
20 category.

21 Our job, as we view it, is the problems.

22 DR. SIESS: But isn't it somebody's job -- maybe
23 it is INPO's job -- to find out why they are doing well and
24 why other people aren't and get the people who aren't doing
25 well to do better?

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MR. ANKRUM: Obviously, it is a hard question.

One aspect is, as you say, the plants are smaller, less complex.

Another reason is --

DR. SIESS: But the modern plants are more complex because they are supposed to be safer?

MR. ANKRUM: Yes. They may be safer in terms of a hands-off. If you walked away and did nothing, they are safer.

The older plants require a lot more operator action, more highly trained operators. There is less hands-off safety.

DR. SIESS: You used the word "required." I don't think you meant that because "required" at NRC is a stronger word than you meant.

MR. ANKRUM: Please. We looked at these things in the 2-A report, the complexity of the plant, the stability of the workforce. Also, there may well be not that much difference between some plants because a plant may not have had its weakness challenged, as it were.

One of those plants that you mentioned that you never read about, we just did a recent inspection on and looked at some of the design aspects. We found that that plant had not maintained its design basis. In fact, they couldn't even find what the original design bases were, and

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2 we found a lot of problems with the designs associated with
3 the outage. We found things that would affect the safety
4 system's functionality of those systems. We found they
5 didn't know why they were doing some things. They had no
6 adequate design basis for doing things. They didn't even
7 know what they had in their plant, why the plant was
8 designed the way it was.

9 So it is difficult to see how they would know if
10 they were to effect the design margins by a subsequent
11 modification.

12 Now, we never looked at that before, and now we
13 go in and we look and we find out there are some problems
14 here.

15 So sometimes you don't have problems that will
16 cause the area -- it just hasn't been challenged.

17 DR. SIESS: That is a good point. But on the
18 NSEP plants that sort of thing was looked at, and there were
19 lots of places where those plants did not meet current
20 design criteria, and I admit you were talking about initial
21 design criteria, and an awful lot of places where they
22 didn't meet current design criteria were considered not too
23 important when you looked at risk rather than regulations.

24 Now, you know, when you look at a deficiency in a
25 plant, you define it in two ways. It is deficient in that
it doesn't meet the requirements laid down by the

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1 regulations, like GDC-55, -56, -57 on isolation valves. You
2 look at it from the standpoint of risk. It doesn't make any
3 difference.

4 So just the fact that they don't meet the
5 requirements doesn't necessarily mean that they are unsafe.

6 I know that is heresy from your side of the
7 table, but not on this side of the table.

8 But you have mentioned other things in terms of
9 ignorance.

10 MR. ANKRUM: One specific finding, accumulator
11 sizing calculations were not performed at this plant. Where
12 modifications affecting the accumulator, the engineers
13 relied on engineering judgment in sizing that accumulator.
14 Previous calculations done, which didn't go back to the
15 original design bases, overestimated available air by over
16 300 percent, and the modifications did not test the ability
17 of the accumulators and valving to perform its design
18 function in the situation that we were faced with.

19 DR. SIESS: What would a modern RELAP calculation
20 show for a large break LOCA?

21 MR. WARD: He is talking about the air system.

22 DR. SIESS: I am sorry.

23 So that would affect the loss of power were you
24 depending on air?

25 MR. ANKRUM: Exactly, and in fact in many plants,

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1 LOCA, you automatically strip the air system from the
2 emergency buses. So you are guaranteeing that you will have
3 a loss of power.

4 DR. SIESS: Was this looked at from a risk point
5 of view, a PRA type thing?

6 MR. ANKRUM: No, we don't do PRAs. We look at
7 safety system functionality. Will it do what it is supposed
8 to do?

9 DR. SIESS: The thing is the risk analysis
10 assumes that sometimes it won't do it. The requirement
11 assumes it will always do it. You see, it was designed to
12 do it, it will do it. But when you start doing the PRA, you
13 notice some things that it won't do.

14 So I still think the bottom line is risk.

15 MR. REED: You bring up the issue of design. I
16 always bring up the issue of operations.

17 We talked about the Rowe picture and the
18 proliferation of inspections on operating plants, and I have
19 said I think there is a key somehow in the resident
20 inspector program if it was used, perhaps proliferated,
21 while other inspections were downgraded in the operating
22 scene.

23 I would like to say the other half of the
24 equation -- I mean, forget construction this time -- the
25 other half of the equation that bothers me has always been

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1 the vendor scene and the design scene.

2 If you go and talk design -- if you can use this
3 Yankee Rowe example -- Yankee Rowe was created when the
4 state of the art wasn't too well-known. It was created
5 without, let's say, steam driven auxiliary feed pumps. That
6 was put in, however, and became the first one ever put in,
7 and the industry followed along. So there was a
8 state-of-the-art situation.

9 It seems to me that the headquarters people of
10 I&E and other headquarters people ought to concentrate on
11 the inspections related to design or concentrate more on
12 vendors and design vulnerabilities being created by
13 vendors.

14 Eventually, you may even get to this licensed
15 vendor scene, but it seems to me there are two halves to
16 quality assurance -- the outbreak plant where you want to
17 have standup experience, people who have had a field life,
18 walking the trenches, and then go to the designer side of
19 your activity. You certainly ought to split these personnel
20 up and have them concentrated where they are most capable to
21 do the job.

22 MR. PARTLOW: That is an integral part of what
23 our safety system's functional inspection is, this somewhat
24 modern version of the PAT team. It is heavily part of the
25 design work, where they concentrate upon what system

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1 modifications have been made, and design experienced people
2 are a part of that.

3 They do what is called the outage inspection
4 program. It keys to the work packages being conducted
5 during that outage and has people on it from the design end
6 of it.

7 MR. REED: Well, if I had been a member of one of
8 your teams or your organization and I never looked at the
9 drawings on Davis-Besse, all I would have to do is look at
10 the drawings. I wouldn't even have to make an inspection at
11 Davis-Besse.

12 I would have looked at the fact that they had
13 four steam driven pumps to provide auxiliary feed; in other
14 words, two mains and two others, and I would have said that
15 design is no good and right there said put a stop to it.

16 I don't understand why that was not. If in 1957,
17 when we created Yankee Rowe, and in the subsequent few years
18 we could have seen the fact that you had to make certain
19 electric and steam availabilities for aux feed, I don't
20 understand why a plant created in the 1970s had this design
21 vulnerability.

22 DR. REMICK: Dave, did you want to comment?

23 MR. WARD: Yes. I would like to go back to the
24 point Dr. Siess raised about the older plants versus the
25 newer plants, seeing some of the agonies the newer plants

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1 seem to have, which was partly revealed by experience,
2 partly by your inspections.

3 The older plants don't seem to have them, and I
4 gather part of that is the older plants were simpler, did
5 not have as many valves, were simpler in hardware but they
6 are also simpler in the tech specs.

7 For the modern plants, the tech specs are more
8 complicated. Both the hardware and the tech specs were made
9 more complicated because it was perceived that these were
10 improvements in safety.

11 And I guess, are the older plants -- so that this
12 gives more things that can go wrong and your inspections are
13 identifying them, but are your inspections tuned properly --
14 are these older plants kind of living in a fool's paradise
15 here?

16 You are inspecting them against old-fashioned
17 standards, which are no longer valid, and if you inspected
18 and challenged them against a more modern set of standards,
19 which hopefully, we think, are more protective of the public
20 health and safety, would you get a seemingly different
21 performance on old versus new?

22 MR. PARTLOW: I think in general there is
23 something to that, which I had said in my little
24 advertisement.

25 We inspect for compliance, and we try to evaluate

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1 performance. But when it comes to inspecting for
2 compliance, today's plants, being licensed today, have much
3 more detailed and expansive commitments than the plants that
4 were licensed in the sixties and early seventies, that is
5 right.

6 What is an example?

7 The standard on quality assurance programs, the
8 NS-3.1, which has versions of 1971, '76, '81, '83. There is
9 a difference in what it takes to be in compliance for a
10 quality assurance program, depending upon which of those
11 standards you are licensed to.

12 Yes, that is there.

13 MR. ANKRUM: There is a conscious Commission
14 policy that plants will be held to the standard in effect at
15 the time their license or permit was granted, absent
16 specific backfitting action. So that is the rules we
17 follow.

18 DR. REMICK: Ted, I sense from your comments
19 about readiness review that you are a believer and think
20 that is the way to go.

21 Of course, that is just a pilot program. I don't
22 think the Commission has made a decision.

23 If somebody were to come along and build a plant
24 next week, do they know what they might be subject to from
25 the standpoint of are they going to have CATs, IDIs, IDVPs,

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1 readiness reviews?

2 Do they have any idea in the area we have been
3 talking about what to expect?

4 I sense -- you say that you are integrating, and
5 that seems like you are impressed with the readiness review;
6 therefore, maybe that would be the recommendation the staff
7 would be making to the Commission.

8 But it seems to me that the future licensee is
9 still subject to a whole lot of these programs, plus many
10 more.

11 Am I correct?

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MR. ANKRUM: Subject to things like when it comes to direct inspection like an IDI or CAT or safety system functional inspection, all these things are direct inspections by the staff. They're not established by rule.

So if the staff finds cause to do those kinds of direct inspections, the staff will do those kinds of direct inspections, if it has the assets to do them and finds cause.

Readiness reviews, on the other hand, that's a program that the utility voluntarily, in the case of Vogel and the Washington Public Power System has voluntarily agreed to undertake. And we agreed to participate in that.

There are duties and benefits to both parts. For instance, the utility is getting incremental acceptance of its work and the NRC is getting a much greater depth of review. And, frankly, it's getting a detailed look at programs earlier than it would have gotten to look at them.

So everybody is gaining from that. Now, what would happen if someone knew comes across the threshold and saying, I'm starting in a green field. I'm taking one of these plants that had been previously suspended. I'm going to put it back on the agenda. And it was only sitting at 20-25 percent when it got suspended, basically, a fresh job.

We've learned a lot. There are a lot of things

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1 that we think could be done better with the construction
2 process. Those things are not being prosecuted through a
3 rule change at this time because the Commission added up its
4 assets versus the needs it saw and decided that it couldn't
5 afford to put staff time in to rule changes for the future
6 at this point in time.

7 So I think that it would be a process of
8 negotiating between the applicant and the staff, and a
9 seeking of voluntary commitments on the part of the utility
10 and agreement to participate on the part of the staff in
11 some of these new things that we're going to.

12 Now, once the utility committed -- and I say
13 commitments in excess of current regulatory requirements --
14 what the utility has committed, it is required to follow
15 that commitment.

16 So your question was: Does a utility know what
17 it can be faced with?

18 The answer is no, because we have not proceeded
19 to rulemaking what a utility is required to do. It knows
20 what it's required to do, and that's no more than it's
21 required to do today.

22 However, I think we've all learned something.
23 And, for instance, the staff has committed to the Commission
24 that if anyone should voluntarily commit to a designated
25 representative program or construction, that we would

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1 entertain and deal with that, that we weren't going to
2 require one by rule at this time but if somebody walked
3 across the threshold and said: We want to do this...we have
4 instructions from the Commission to work that out.

5 So no utility would not know what they're dealing
6 with right now unless they wanted to say, Hey, I'm going to
7 do what the minimum requirements are in the regulations.

8 DR. REMICK: The point I was trying to get at,
9 one could interpret all the programs that we're talking
10 about are attempts basically by the staff to find the best
11 way. And to find the best way, they're going to narrow it
12 down to that.

13 The other could be that the staff has a certain
14 number of resources and they're trying to find a way to keep
15 everybody busy.

16 Therefore, if you want to narrow it down, you've
17 got to cut the resouces. There are two different ways of
18 looking at it. I'm trying to find where the staff is
19 heading.

20 MR. ANKRUM: It's the former, not the latter. We
21 have more jobs than we have resouces. So it's very
22 definitely the former.

23 DR. REMICK: Chet.

24 DR. SIESS: I have two questions. Both of them,
25 I think, have relatively short answers and if they don't, we

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1 can defer them.

2 First, in relation to design review, what is your
3 thinking or your practice for standard designs?

4 MR. ANKRUM: Well, the Commissioners are on
5 record that standardized designs are the way to go. The
6 only question that seems to be on the table is how much
7 design is a, quote, "completed design" before you come to
8 the CP?

9 I don't believe there's any agreement at this
10 point in time on how much of a design are we talking about
11 should be in place prior to the CP application coming.

12 I think, in practical effect, it will be a rather
13 substantially advanced state of design.

14 DR. SIESS: Let's take the specific GESSAR II as
15 a standard design. Has there been IDI, IDVP, any
16 independent review of that design?

17 MR. ANKRUM: No.

18 DR. SIESS: Nothing planned?

19 MR. ANKRUM: Nothing other than the NRR design
20 review and nothing planned because we don't have a specific
21 application.

22 DR. SIESS: And you're going to separate. You
23 make a distinction then between a standard plant design and
24 one that's been referenced in an application. It won't be
25 reviewed until it's referenced in an application?

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1 MR. ANKRUM: We're not going to inspect a design
2 unless we've got an applicant.

3 DR. SIESS: If you get one applicant, you'll
4 inspect it and that will hold for the second one?

5 MR. ANKRUM: Well, we have a precedent for that
6 in the current design inspection activities. We've
7 inspected a first unit and the second unit tends to
8 replicate it. And sometimes more than the second unit. And
9 I'll use the case of Byron I.

10 At Byron I, the design was looked at with an IDI
11 in considerable depth. There was an IDVP that followed as a
12 result of that IDI to follow up some loose threads. We have
13 accepted the validity of that inspection for Byron II,
14 Braidwood I and II and Marble Hills. It would have been
15 accepted for Marble Hills.

16 DR. SIESS: It's the safest of the four.

17 MR. ANKRUM: Safe for the peculiarities of each
18 of those individual plants. Braidwood had some
19 peculiarities that Byron I did not have.

20 DR. SIESS: My second question. Have you made
21 any progress on establishing a relationship between quality
22 assurance, quality and safety?

23 MR. ANKRUM: That's a loaded question. That
24 doesn't have a short answer?

25 DR. SIESS: We've asked it before and you said

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1 you were going to try.

2 MR. WARD: They did.

3 MR. ANKRUM: We tried and we said we couldn't
4 quantify it.

5 MR. WARD: I always felt we got a little bit of a
6 token effort there.

7 (Laughter.)

8 MR. ANKRUM: Let's try it this way. We have more
9 jobs than we have people to do them. And we didn't put a
10 lot of people on that question.

11 DR. REMICK: Dave.

12 MR. WARD: If it's appropriate, I would like to
13 address a proposition to the subcommittee. I'll try to make
14 it brief. The NRR has a branch that has developed methods
15 and continually applies these methods, making a sort of
16 accrued cost benefit analyses of generic issues to decide
17 whether it's appropriate for the staff to spend the
18 resources on addressing the issue.

19 I guess we've had some discussion here of whether
20 some of these programs within the sort of work that we're
21 talking about here could survive the sort of scrutiny that
22 that kind of cost benefit analysis entails.

23 I suspect there are a number of other programs
24 throughout the agency that similarly have questionable cost
25 benefit standing. There's a lot of scoffing about the

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1 ability of that cost benefit analysis to approach the true
2 relationships and cost benefits.

3 But it is a reasonably disciplined and sincere
4 effort to do as best as can be done. What you either do in
5 that method or you do by pulling numbers completely out of
6 the air.

7 Now I understand the agency is going to be faced
8 with probably some pretty dramatic budgetary cutbacks in the
9 next year. And a lot of programs are going to have to be
10 cut out.

11 I guess I'm asking the subcommittee to consider
12 whether they think that existing programs of the agency as
13 well as proposed new programs on generic issues shouldn't be
14 subjected to this sort of analysis, that the Generic Issues
15 Branch has given as a basis for prioritizing what's going to
16 be left of the agency.

17 DR. REMICK: I guess one of the problems I would
18 have with that, I don't know if he could do a cost benefit
19 on the idea of the problem you might find by inspection.
20 You might be able to do it by case histories, of taking
21 maybe an IDI or an IDVP that has been conducted and say:
22 What did you find and what was the safety significance of
23 that finding from the standpoint of public risk, and what
24 did it cost? And make some maybe decisions based on
25 experience.

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1 I guess I can't quite see how you'd do that into
2 the future, where you don't know where a future IDI or IDVP
3 or future readiness review, what safety improvement it might
4 result in.

5 That's my initial reaction. I'm not opposed to
6 it but it seems to me we might almost have to do it by case
7 study.

8 MR. ANKRUM: Let me point out you also have
9 another side to that coin. And that is you might have a
10 plant in which questions about the safety of that plant had
11 been raised that were design-related. And in the
12 prosecution of the inspection, you find that those questions
13 have no validity, or are particularly significant. And it
14 allows the licensee to go forward.

15 Now we have two specific instances of that. I
16 should say three specific instances. In the case of Byron
17 I, the IDI found a number of problems. And we required the
18 utility to do further work to prove to us that the problems
19 we found didn't have cross-cutting implications throughout
20 the remainder of the design.

21 They undertook that work and came in with the
22 answer. We looked over their shoulder the whole time. In
23 the meanwhile, the intervenor for the Byron I plant
24 petitioned to reopen the hearing on the basis of our
25 original inspection findings.

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2 We were able, through both the IDI and the
3 followup work to that, to satisfy the Board that we in fact
4 knew what the status of the safety consequences of those
5 findings were.

6 The Board declined to reopen the hearing. And
7 the case of the Clinton Station and the Hope Creek Station,
8 as a result of the IDVP's, the joint intervenor in each case
9 agreed to drop their design QA contentions, which were the
10 major contentions before the hearing.

11 And, in both of those cases, the plant went
12 forward with an uncontested hearing. In fact, no hearing.

13 So, to say that you want to measure the
14 effectiveness of some of these inspections by the safety
15 significance of the findings only looks at one side of the
16 coin.

17 Finding that there are no deficiencies of safety
18 significance is equally as important.

19 DR. SIESS: Well, it has a cost aspect, too. I
20 think that's part of it but I think that not only I&E and QA
21 activities, but in other areas of NRC, it's not going to be
22 merely as simple to do a cost benefit like we do on generic
23 issues, where it's a clear-cut, technical type issue.

24 I think many other areas are driven by public
25 relations, Congressional relations, things of that sort.
Things are being done because of the hearing process, the

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1 intervenors. Things are being done because Congress said to
2 do them. Over and above the mandate from Congress to make
3 them safe, Congress says do this, do that.

4 So it really complicates it and nobody's going to
5 do it until the budget gets cut. And then they don't do it
6 in some cases.

7 MR. WARD: But I think, even in most cases, the
8 fact that things are being done, that nonsense is being
9 carried out because the Congress says to, ought to be pinned
10 on Congress. Not sort of disguised as some sort of safety
11 beneficial activity.

12 DR. SIESS: I've got a real long list of those.

13 DR. REMICK: Any other discussion or questions?

14 (No response.)

15 DR. REMICK: If not, I think we've gone on long
16 enough. I don't want to cut it short because we certainly
17 have time.

18 (No response.)

19 DR. REMICK: If not, I want to thank the staff
20 for participating in our seminar today and, occasionally, in
21 our lecture. We do appreciate your coming down. We had
22 hoped that your answers could have been a little bit more
23 specific on the cost benefit.

24 I necessarily understand the difficulty in that
25 but we appreciate your coming down and expressing your

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1 views and making comments on the effort that has been made.

2 Thank you.

3 (Whereupon, at 12:05 p.m., the meeting

4 adjourned.)

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CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING: ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
SUBCOMMITTEE ON QUALITY AND
QUALITY ASSURANCE

DOCKET NO.:

PLACE: WASHINGTON, D. C.

DATE: FRIDAY, DECEMBER 13, 1985

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission.

(sig) 

(TYPED)

DAVID L. HOFFMAN

Official Reporter

ACE-FEDERAL REPORTERS, INC.
Reporter's Affiliation

NRC INSPECTION PROGRAM

- o INSPECTION PROGRAM OBJECTIVE: TO ENSURE QUALITY CONSTRUCTION AND SAFE OPERATION OF LICENSED FACILITIES THROUGH:
 - VERIFICATION THAT ACTIVITIES ARE IN COMPLIANCE WITH NRC REQUIREMENTS
- AND
- EVALUATION OF LICENSEE PERFORMANCE IN DISCHARGING PRIMARY RESPONSIBILITY FOR NUCLEAR SAFETY
- o INSPECTION PROGRAM RESOURCES ARE ALLOCATED DEPENDING UPON TYPE OF FACILITY, STATUS OF CONSTRUCTION/OPERATION, AND REGULATORY PERFORMANCE:
 - 90% OF DIRECT INSPECTION RESOURCES DEDICATED TO COMMERCIAL REACTORS; 10% DEDICATED TO FUEL CYCLE FACILITIES, MATERIALS AND RESEARCH REACTORS.
 - LEVEL OF GENERAL REACTOR INSPECTION EMPHASIS IS BASED UPON PLANT STATUS. FOR EXAMPLE, A SINGLE UNIT SITE IS ALLOCATED ABOUT:
 - 4 INSPECTOR FTE/YR DURING CONSTRUCTION
 - 6 FTE/YR DURING PRE-OP TESTING (18 MONTHS PRIOR TO OL)
 - 4.7 FTE/YR DURING START-UP (2 YEARS AFTER OL)
 - 4 FTE/YR DURING OPERATION (AFTER FIRST 2 YEARS)
 - ONE OBJECTIVE OF SALP PROGRAM IS TO DEVOTE INSPECTION ATTENTION TO SPECIFIC PLANTS BASED UPON PERFORMANCE. SALP CATEGORY ONE INDICATES A CANDIDATE FOR REDUCED INSPECTION; INCREASED INSPECTION IS CONSIDERED FOR CATEGORY THREE. REGIONS DEVELOP PLANT SPECIFIC INSPECTION PLANS.

THREE BASIC SEGMENTS OF INSPECTION

- o RESIDENT INSPECTION: THE AGENCY'S CONTINUING ONSITE PRESENCE. RESIDENT PROCEDURES ORIENTED TOWARD DIRECT OBSERVATION OF ROUTINE AND SPECIAL ACTIVITIES: DAILY VISITS TO CONTROL ROOM, SYSTEM WALKDOWNS, OBSERVATION OF MAINTENANCE, SURVEILLANCE AND CONTROL ROOM OPERATIONS, "PULLING THE STRING" ON MATTERS WHICH APPEAR QUESTIONABLE.
- o REGION BASED INSPECTION: COMPLEMENTS THE RESIDENT PROGRAM THROUGH PROGRAMMATIC INSPECTIONS (QA, TRAINING, ETC.) AND SPECIFIC TECHNICAL EXPERTISE (HP, EP, SAFEGUARDS, ELECTRICAL/MECHANICAL ETC.). REGIONAL INSPECTORS PROVIDE PERSPECTIVE IN EVALUATING REGULATORY PERFORMANCE SINCE THEY ROUTINELY INSPECT MANY SITES WITHIN THE REGION.
- o IE HEADQUARTERS INSPECTION: IE CONDUCTS PROGRAMS WHICH ARE MOST EFFECTIVELY MANAGED ON A NATIONAL BASIS:
 - VENDOR INSPECTION PROVIDES A CENTRAL ORGANIZATION FOR WORKING WITH REGIONS TO FOCUS VENDOR PERFORMANCE PROBLEMS WHICH AFFECT PLANTS IN EACH REGION.
 - CAT/PAT INSPECTIONS PROVIDE MECHANISM FOR ASSESSMENT OF REGIONAL PERFORMANCE, MONITORING OF INPO EFFECTIVENESS, GATHERING OF INFORMATION ON PERFORMANCE FROM A NATIONAL PERSPECTIVE, AND INPUT TO INSPECTION PROGRAM DEVELOPMENT.
 - INDEPENDENT DESIGN INSPECTIONS (IDI) PROVIDE FOR A CORE OF DESIGN EXPERTISE IN HEADQUARTERS. SINCE IDI CONCENTRATES SIGNIFICANTLY ON AE ACTIVITIES, CENTRALIZATION OF INSPECTIONS IS MORE EFFECTIVE.
 - IN SUCH AREAS AS FIRE PROTECTION AND EQUIPMENT QUALIFICATION, IE DIRECTLY MANAGES ONSITE INSPECTION PROGRAM ONLY UNTIL SUCH TIME AS POLICY HAS BEEN DETERMINED, INSPECTION PROCEDURES ARE FULLY DEVELOPED, AND REGIONS HAVE GAINED EXPERIENCE. PROGRAM IS THEN REGIONALIZED.

GENERAL ATTRIBUTES OF INSPECTION PROGRAM

- o INSPECTION PROGRAM FOR OPERATING REACTORS IS GENERALLY DIVIDED INTO THREE LEVELS:
 - MINIMUM PROGRAM: CONSISTS PRIMARILY OF RESIDENT INSPECTION ACTIVITIES PLUS MINIMAL CHECKS BY REGION BASED INSPECTORS. REPRESENTS A "LOWER LIMIT" GUIDELINE FOR REGIONAL USE IN SALP CATEGORY ONE CASES OR WHEN RESOURCES ARE TEMPORARILY STRAINED DUE TO PROBLEMS AT OTHER PLANTS.
 - BASIC PROGRAM: THE LEVEL WHICH IS NORMALLY EXECUTED AT MOST PLANTS. ROUGHLY EQUATES TO CATEGORY TWO PERFORMANCE.
 - SUPPLEMENTARY PROGRAM: ADDITIONAL INSPECTION PROCEDURES TO BE USED IN CONJUNCTION WITH CATEGORY THREE PERFORMANCE, MAJOR PLANT EVENTS OR UNUSUAL CONDITIONS.
- o RESIDENT INSPECTORS PERFORM DIRECT INSPECTION ACTIVITIES ABOUT TWO-THIRDS OF WORK TIME.
- o REGIONAL INSPECTORS ARE ONSITE PERFORMING DIRECT INSPECTION ACTIVITIES ABOUT ONE-THIRD OF WORK TIME. TRAVEL TO/FROM SITE, TRAINING, AND OTHER ACTIVITIES RESULTS IN TYPICAL INSPECTOR BEING IN TRAVEL STATUS FOR OVER 40% OF TIME.
- o ABOUT TWO-THIRDS OF AN INSPECTOR'S DIRECT INSPECTION TIME IS DEVOTED TO PLANNED ("PREVENTIVE") INSPECTION ACTIVITIES. ABOUT ONE-THIRD IS "REACTIVE" INSPECTION RESULTING FROM EVENTS, REPORTS, ETC.
- o ON AN ANNUAL BASIS, ABOUT 20% OF RESIDENT INSPECTOR'S ON-SITE TIME IS DEVOTED TO BACKSHIFT ACTIVITIES.
- o SEPARATE FROM ASSIGNMENTS MADE BY SUPERVISORS, ALL INSPECTORS ARE AFFORDED OPPORTUNITY TO SPEND 20% OF ONSITE TIME IN INDEPENDENTLY REVIEWING AREAS OF CONCERN/INTEREST WHICH ARE SAFETY RELATED.

INSPECTION PROGRAM PLANS/TRENDS

o IE PLANS FOR NEXT SEVERAL YEARS INCLUDE:

- INCREASE TO TWO RESIDENTS AT MOST SINGLE UNIT OPERATING SITES
- INCREASED USE OF REGIONAL TEAM INSPECTIONS TO DIAGNOSE PROBLEMS
- MORE EMPHASIS ON DEVELOPMENT OF SITE SPECIFIC INSPECTION PLANS WHICH REFLECT LICENSEE PERFORMANCE
- EMPHASIS ON "PERFORMANCE MEASURES" FOR EVALUATING PROGRAM ADEQUACY (TRAINING, QA, MAINTENANCE)
- DEVELOPMENT OF OUTAGE INSPECTION PROGRAM AIMED AT ENSURING THAT MODIFICATIONS/REPAIRS DO NOT DEGRADE SAFETY MARGINS
- PHASEOUT OF REGULAR CAT AND IDI INSPECTIONS IN FY-87
- INSPECTION EMPHASIS DURING FIRST TWO YEARS OF REACTOR OPERATION
- ADDITIONAL EMPHASIS ON UTILITY RESPONSIBILITY TO PROCURE QUALITY PARTS/SERVICES FROM VENDORS
- DEVELOPMENT OF REALISTIC USES OF PRA IN INSPECTION PROGRAM

IE PROGRAM RESPONSIBILITIES

- o IE DEVELOPS AND PROMULGATES INSPECTION PROGRAM POLICY AND PROCEDURES FOR IMPLEMENTATION BY REGIONAL OFFICES
- o REGIONAL ADMINISTRATORS ARE RESPONSIBLE TO IE FOR IMPLEMENTATION OF IE PROGRAMS WITHIN THE BOUNDS OF POLICY GUIDANCE
- o IE IS RESPONSIBLE TO THE EDO FOR ASSESSING THE ONGOING EFFECTIVENESS AND UNIFORMITY OF REGIONAL IMPLEMENTATION OF INSPECTION PROGRAMS. IE ASSESSES PERFORMANCE OF EACH REGION THROUGH:
 - THE CONDUCT OF PAT, CAT AND OTHER INDEPENDENT INSPECTIONS BY IE
 - ACCOMPANIMENT ON REGIONAL INSPECTIONS
 - ASSESSMENT VISITS TO REGIONAL OFFICES
 - REVIEW OF INSPECTION REPORTS AND DATA SYSTEMS
 - REVIEW AND OBSERVATION OF SALP ACTIVITIES
 - ROUTINE STAFF AND MANAGEMENT INTERFACE IN SUCH MATTERS AS INSPECTION PROGRAM DEVELOPMENT, AND RESOLUTION OF INTERNAL POLICY ISSUES AND LICENSEE PROBLEMS

ALLEGATION MANAGEMENT SYSTEM
(AMS)

- o MANUAL CHAPTER 0517
- o COMPUTERIZED TRACKING SYSTEM

NRC MANUAL CHAPTER 0517
ALLEGATION MANAGEMENT SYSTEM

- o DRAFTED BY IE
- o ISSUED BY EDO SEPTEMBER 1984 IN DRAFT AS POLICY GUIDANCE.
- o COMMISSION DECISION ON LATE-FILED ALLEGATIONS ISSUED MARCH 1985.
- o COMMISSION DECISION ON CONFIDENTIALITY ISSUED NOVEMBER 1985.
- o 0517 BEING REVISED. TO BE FINALIZED FEBRUARY 1986.

MAJOR POLICY AREAS-0517

- o ESTABLISHMENT OF OFFICE COORDINATORS
- o CONTACT WITH ALLEGERS
 - CONFIDENTIALITY
- o CONTACT WITH LICENSEE
 - NO BREACH OF CONFIDENTIALITY
 - NO COMPROMISE OF INSPECTION/INVESTIGATION
- o DOCUMENTATION
- o CLOSE-OUT WITH ALLEGER
- o LATE-FILED ALLEGATIONS

CONFIDENTIALITY

- o NOT OFFERED TO ALL
- o USE AS TOOL, WHEN NECESSARY, TO ELICIT INFORMATION.
- o SIGNED CONFIDENTIALITY AGREEMENT
- o NRC WILL MAKE ITS BEST EFFORTS TO PROTECT IDENTITY OF A CONFIDENTIAL SOURCE
- o IDENTITY RELEASED WITHIN NRC ONLY ON NEED-TO-KNOW BASIS.
- o IDENTITY RELEASED OUTSIDE NRC ONLY:
 - BY ORDER OF A COURT
 - BY ORDER OF THE COMMISSION
 - TO FEDERAL OR STATE AGENCY
 - TO CONGRESS

(SEE SRM OF NOVEMBER 1, 1985)

LATE-FILED ALLEGATIONS

- o POLICY APPROVED BY COMMISSION MARCH 1985
- o RESULTED FROM RECEIPT OF LARGE NUMBER OF ALLEGATIONS .
JUST PRIOR TO LICENSING.
- o STRESSES RESPONSIBILITY OF ALL TO BRING CONCERNS TO
APPLICANT OR NRC AS SOON AS POSSIBLE
- o ESTABLISHES SCREENING CRITERIA FOR THOSE ALLEGATIONS THAT
ARE NEW AND MATERIAL TO LICENSING DECISION
 - LIKELIHOOD THAT THE ALLEGATION IS TRUE
 - SAFETY SIGNIFICANCE

ALLEGATION PROCESSING

ALLEGATION
RECEIVED BY NRC

ALLEGATION
DOCUMENTED

ALLEGATION REVIEW
BOARD MEETING

ALLEGER
CONTACTED

RESOLUTION ACTIVITY -
INSPECTION/INVESTIGATION
EVALUATION

PREPARATION OF
RESOLUTION DOCUMENT

ALLEGER CONTACTED
CLOSE-OUT

ALLEGATION CLOSED
IN AMS

OPEN ALLEGATIONS

AS OF 11/29/85

BRAIDWOOD 1	18
BYRON 2	2
CATAWBA 2	1
CLINTON	35
COMANCHE PEAK 1	200
HOPE CREEK	3
MILLSTONE 3	18
NINE MILE 2	7
PALO VERDE 2	11
PERRY 1	8
SEABROOK 1	5
SHEARON HARRIS	16
SHOREHAM	9
VOGTLE 1	22
WATTS BAR 1	77