

PI&R Inspection Discussion

ROP Public Meeting

January 18, 2023



Purpose

- Provide additional insights on the PI&R Inspection Program following the ROP Task Force review of SECY-22-0087

Overview

- We agree that PI&R program enhancements are warranted
- The NRC staff identified some enhancements that would have benefited from a decrease in team inspection frequency
- We see all enhancements as complementary to an effective PI&R program consistent with the Principles of Good Regulation

Background

- There have not been any substantive changes to the PI&R IP 71152 since 2005
- SECY-19-0067 (ROP Enhancements) submitted to the Commission June 2019
 - Recommended revising PI&R inspection (team portion) from biennial to triennial
 - ◆ Credits the semi-annual and annual portions of PI&R inspection requirements to prioritize, evaluate and correct conditions adverse to quality
 - ◆ Other baseline inspection procedures include 10 - 15% PI&R inspection scope related to CAP in applicable inspectable area

Background

- Comprehensive review of PI&R inspection program completed November 2020 recommending small enhancements
 - Supports both the current biennial & proposed triennial team inspection frequencies
 - Addresses inspector feedback to improve clarity of inspection guidance to enhance consistency (reduces inspection overlap)
 - ◆ Team inspection scope would be on licensee implementation of PI&R program focusing on identification, prioritization, evaluation, and corrective action
 - ◆ Audits, Self-Assessments, and Operating Experience reviews will allow redistribution of inspection resources to improve efficiency
 - ◆ Duplicative guidance that overlaps with annual and semiannual samples would be removed
 - ◆ Changes will be implemented prior to start of next inspection cycle in 2024
 - In January 2022, the daily resident PI&R screening was moved to IMC-2515 to improve inspection hour tracking

Background

- SECY-19-0067 was withdrawn August 2021 to reevaluate all ROP enhancement recommendations
- SECY-22-0087 submitted to the Commission September 2022 to reconsider the PI&R team inspection frequency with two options
 - Option 1: Maintain the current biennial inspection frequency
 - Option 2: Decrease the inspection frequency to triennial
- NRC staff recommended maintaining the frequency at biennial
 - No new information or rigorous technical basis was provided for changing the original recommendation
 - The results of the comprehensive review of PI&R and recommended enhancements were referenced as the bases for maintaining the current inspection frequency (even though the comprehensive review accounted for a change in frequency)

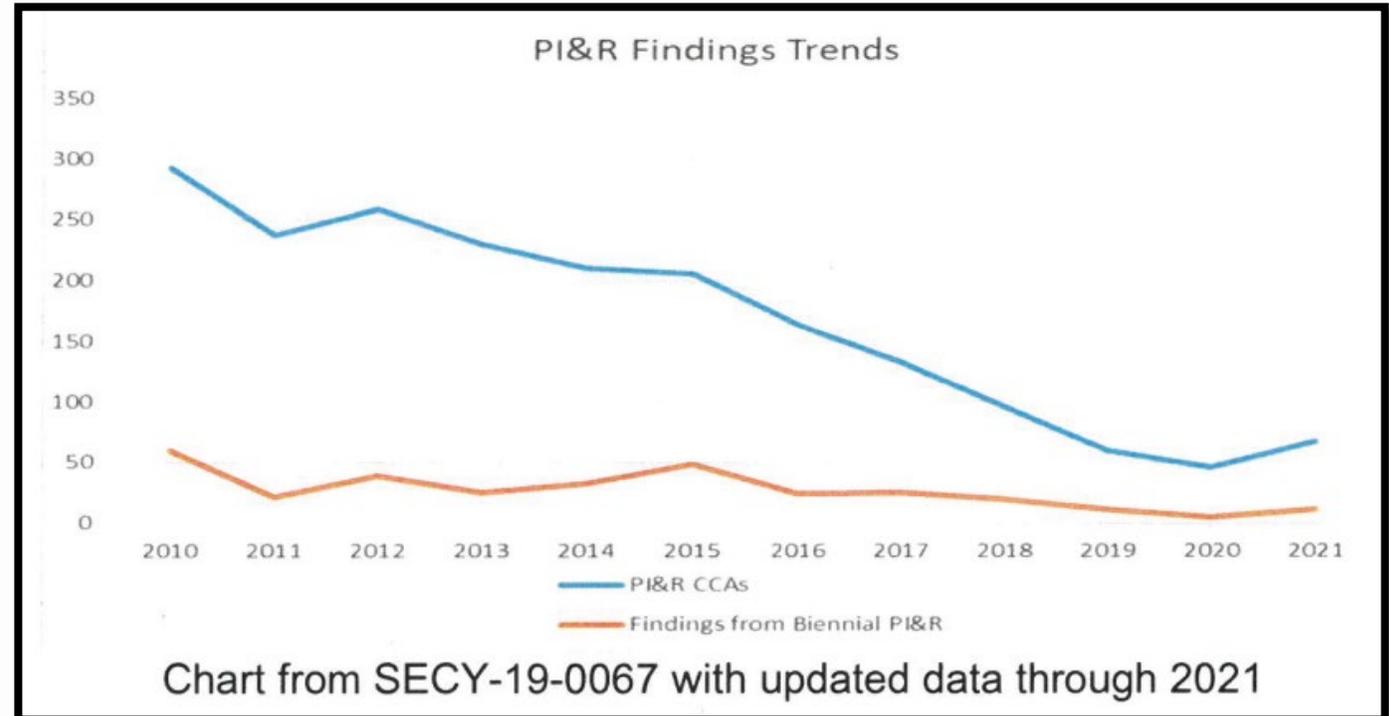
PI&R Inspection Scope

- PI&R is inspected every day through plant status activities
- Over 20% (~625 hours) of all direct inspection hours focus on PI&R programs
 - Semiannual Trend Review - 20 hours (40 annualized hours)
 - Annual Follow-up of Selected Issues (74 annualized hours)
 - Biennial Team Inspection - 250 hours (125 annualized hours)
 - PI&R review during ROP baseline inspections - 10-15% (209 annualized hours)
 - Daily through plant plant status activities - IMC-2515, App. D (177 annualized hours)

PI&R Finding Trends

- The total number of PI&R inspection findings have decreased significantly since 2010
- Similar trend for biennial team inspection portion of IP 71152 (less than 10 findings annually since 2018)
- Most PI&R inspection findings come from the elements of IP 71152 that are not part of the biennial team inspection (i.e., semiannual, annual, and 10-15% of all baseline inspections)

Chart from SECY-22-0087



Other Insights

- The original staff recommendation to change the PI&R inspection (team portion) frequency from biennial to triennial would only reduce the PI&R inspection related annualized hours from ~625 to 583
- This represents ~1.5% decrease in all annual direct inspection hours {*PI&R activities would continue to represent greater than 20%*}
- Based on 2021 data:
 - 1 PI&R finding was identified for approximately every 4500 inspection hours (other than biennial team inspections)
 - 1 PI&R finding was identified for approximately every 22,500 inspection hours during biennial team inspections
 - This reinforces that significantly more PI&R findings are identified through the PI&R inspection elements outside of the PI&R team inspection

Summary

- Enhancement to the PI&R inspection program remains appropriate
- A triennial PI&R inspection frequency remains justified as described in SECY-19-0067
- Changing from biennial to triennial would permit corrective actions to have more time to effect change while negligibly reducing the NRC's oversight of PI&R programs
- We encourage the NRC staff to continue efforts to enhance IP 711152 to improve clarity to support inspection consistency and reduce overlap that exists in the current guidance while awaiting a decision on SECY-22-0087
- We look forward to engaging on the proposed changes as they are being developed to support implementation starting in 2024

Questions

