

Inspections of Centralized Programs

Public Workshop

May 9, 2024

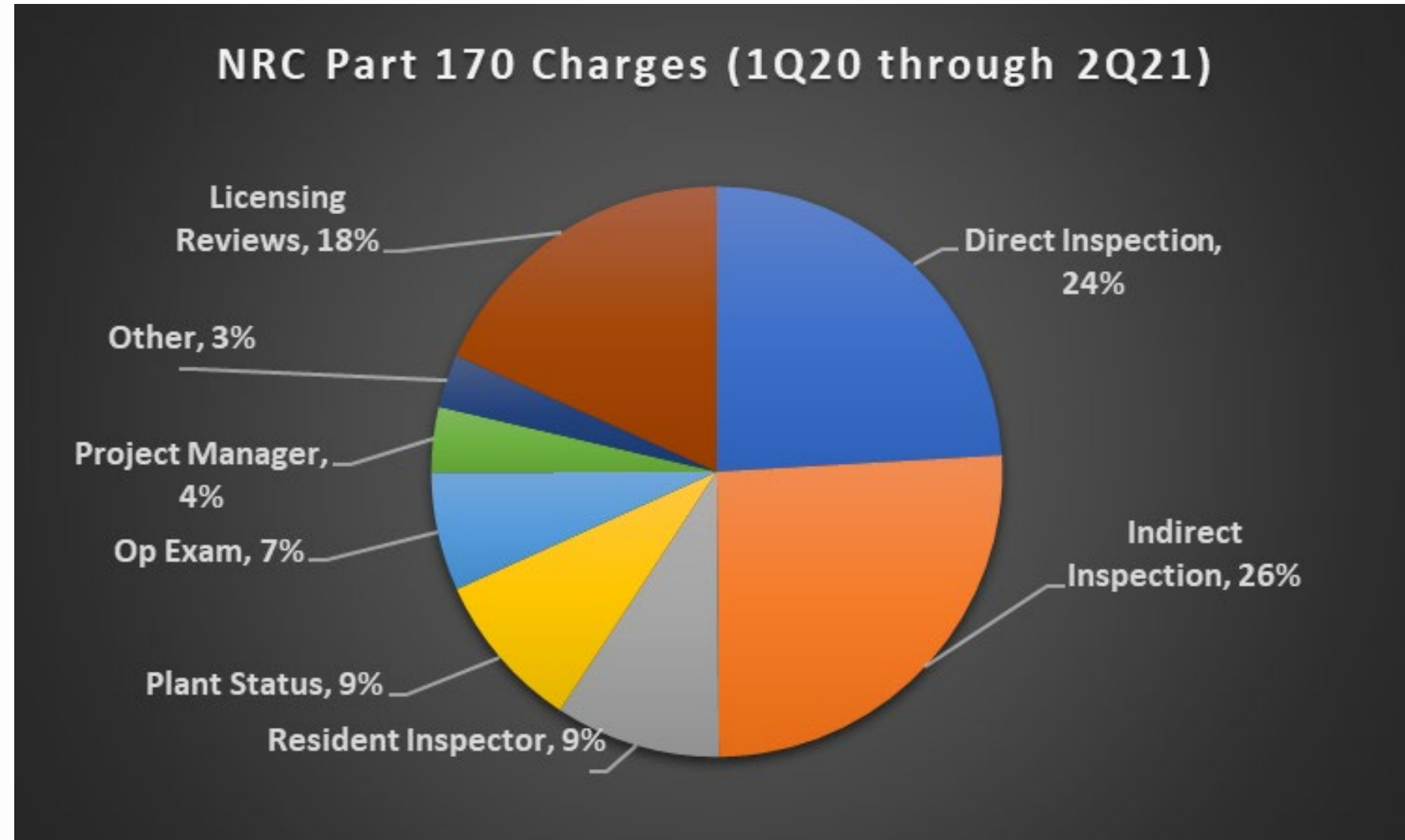


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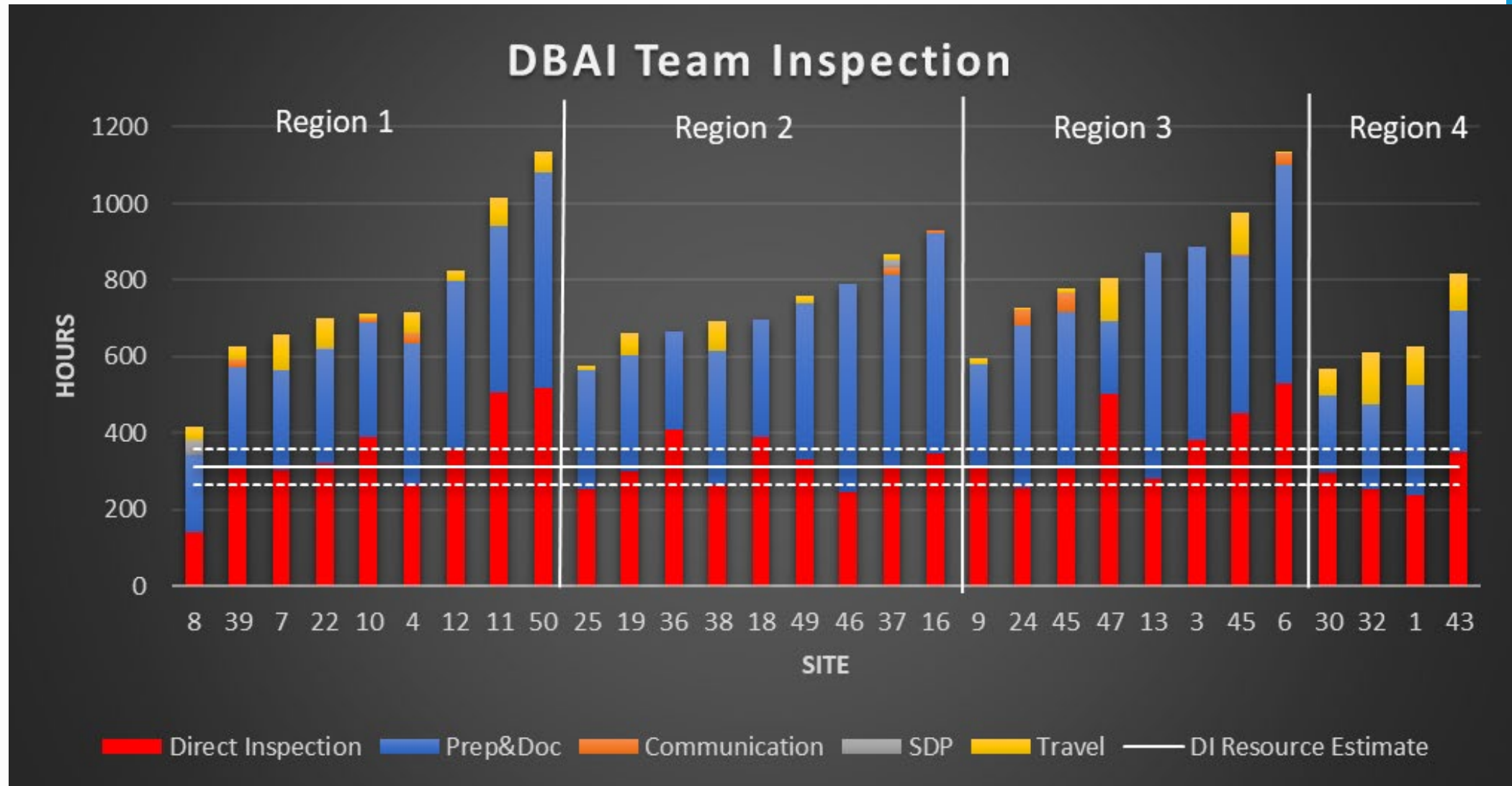
- Multiple inspections during the year at a utility with a centralized program imposes undue burden on program staff and unnecessary overlap or duplication of effort by NRC inspectors.
- Applicable to inspections of centrally-led programs, including:
 - Security areas such as AA/FFD
 - Elements of engineering inspections such as CETI, CGD, ARD, Fire Protection
 - Cybersecurity
 - 10 CFR 50.69

Breakdown of Part 170 Charges

- Inspection hours account for ~50% of charges
- Covers:
 - Direct Inspection
 - Indirect Inspection
 - Prep & Doc
 - Travel
 - Communication
 - SDP



Direct vs Indirect Inspection



Recommendations

- Develop/update NRC guidance to provide flexibility in inspection planning for programs with centralized functions:
 - IMC 0305
 - ◆ As part of development of inspection plans, allow Branch Chief to coordinate w/ licensee to pursue efficient inspection scheduling
 - IMC 2515, App A
- For fleets across multiple regions:
 - Coordinate inspection plans and resources across the regions
- Provide different inspection approaches in guidance

Example #1

- Same inspection team and team leader
- One entrance meeting for the fleet
- First week at centralized location interviewing program staff, reviewing program documents, etc
 - Off-week → On-site at first site → Off-week → Repeat as needed
- One exit meeting
- One IR covering all sites
 - Findings would be docketed to impacted sites, based on implementation

Example #1 (cont'd)

- 3 sites: one prep week, at central location, offsite, onsite, offsite, onsite, offsite, onsite, doc (9 total weeks)
 - Historical - prep week, onsite, offsite, onsite, doc (4 weeks) x 3 sites = 12 weeks
- Considerations:
 - Would complete multiple inspections in shorter period than separate inspections, freeing up licensee and NRC resources for remainder of inspection cycle
 - Inspector familiarity and continuity by using same inspectors
 - Requires availability of NRC inspectors and licensee program staff for longer duration
 - Disposition of a generic issue could involve citing all dockets

Example #2

- Ex #1 in reverse
- Perform all site walkdowns/samples first
- Collect questions/issues of concern and reconvene at central location to interview program staff
- Considerations:
 - Similar to Example #1, multiple inspections completed in shorter time period
 - Inspectors have earlier opportunity to walk down sites and identify issues for review during final week
 - Similar to Example #1, requires availability of NRC and licensee staff for longer duration

Example #3

- First inspection in the fleet includes review of program and common inspection elements.
- Subsequent inspections could credit activities performed in previous inspections.
- Findings would be docketed to site receiving inspection.
- Considerations:
 - Subsequent inspections could be more efficient
 - Provides flexibility to account for differences in fleet programs
 - Most efficient results requires same NRC inspectors for each subsequent inspection

Questions

