

February 28, 2003

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Samuel J. Collins, Director
Office of Nuclear Reactor Regulation /**RA**/

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SUBJECT: STATUS OF IMPLEMENTATION OF DAVIS-BESSE LESSONS
LEARNED TASK FORCE REPORT RECOMMENDATIONS

The attached table provides the status of implementation of the Davis-Besse Lessons Learned Task Force Report recommendations as of _____.

Since the last update, the following milestones have been completed:

Since the last update, there were schedule changes associated with the following milestones:

Status of Davis-Besse LLTF Recommendations

| LLTF No. | LLTF Recommendation | Priority | Lead Org. | Target Date | Status |
|---|--|----------|------------|-------------|--------|
| 1. Assessment of Stress Corrosion Cracking | | | | | |
| 3.1.1(1) | <i>Assemble foreign and domestic information concerning Alloy 600 (and other nickel based alloys) nozzle cracking and boric acid corrosion. Analyze nickel based alloy nozzle susceptibility to stress corrosion cracking (SCC), including other susceptible components, and boric acid corrosion of carbon steel, and propose a course of action and an implementation schedule to address the results.</i> | High | RES(DET) | | |
| 3.3.2(1) | <i>Develop inspection guidance for the periodic inspection of PWR plant boric acid corrosion control programs.</i> | High | NRR(IIPB) | | |
| 3.2.2(1) | <i>Inspect the adequacy of PWR plant boric acid corrosion control programs.</i> | | NRR (IIPB) | | |
| 3.3.4(3) | <i>Develop inspection guidance or revise existing guidance to ensure that VHP nozzles and the RPV head area are periodically reviewed by the NRC during licensee ISI activities.</i> | High | NRR (IIPB) | | |
| 3.3.4(8) | <i>Encourage ASME Code requirement changes for bare metal inspections of nickel based alloy nozzles for which the code does not require the removal of insulation for inspections. Also, encourage ASME Code requirement changes for the conduct of non-visual NDE inspections of VHP nozzles. Alternatively, revise 10 CFR 50.55a to address these areas.</i> | High | NRR(DE) | | |

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| 3.1.4(1) | <i>Determine if it is appropriate to continue using the existing SCC models as a predictor of VHP nozzle PWSCC susceptibility.</i> | Medium | RES | | |
| 3.3.7(6) | <i>Determine whether ISI summary reports should be submitted to the NRC, and revise the ASME submission requirement and staff guidance regarding disposition of the reports, as appropriate.</i> | Low | NRR (DE) | | |

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|-----------|--|----------|--------------------|-------------|--------|
| 2. | Assessment of Operating Experience, Integration of Operating Experience into Training, and Review of Program Effectiveness | | | | |
| 3.1.6(1) | <i>Take the following steps to address the effectiveness of programs involving the review of operating experience: (1) evaluate the agency's capability to retain operating experience information and to perform longer-term operating experience reviews; (2) evaluate thresholds, criteria, and guidance for initiating generic communications; (3) evaluate opportunities for additional effectiveness and efficiency gains stemming from changes in organizational alignments (e.g., a centralized NRC operational experience "clearing house"); (4) evaluate the effectiveness of the Generic Issues Program; and (5) evaluate the effectiveness of the internal dissemination of operating experience to end users.</i> | High | NRR (RORP) | | |
| 3.1.6(2) | <i>Update NRC operating experience guidance documents.</i> | | NRR (RORP) | | |
| 3.1.6(3) | <i>Enhance the effectiveness of NRC processes for the collection, review, assessment, storage, retrieval, and dissemination of foreign operating experience.</i> | | NRR (RORP) and RES | | |
| 3.2.4(1) | <i>Assess the scope and adequacy of requirements governing licensee review of operating experience.</i> | | NRR (RORP) | | |
| 3.3.4(2) | <i>Strengthen inspection guidance pertaining to the periodic review of operating experience.</i> | | NRR (RORP) | | |

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| 3.3.1(1) | <i>Provide training and reinforce expectations to NRC managers and staff members to address the following areas: (1) maintaining a questioning attitude in the conduct of inspection activities; (2) developing inspection insights stemming from the DBNPS event relative to symptoms and indications of RCS leakage; (3) communicating expectations regarding the inspection follow-up of the types of problems that occurred at DBNPS; and (4) maintaining an awareness of surroundings while conducting inspections. Training requirements should be evaluated to include the appropriate mix of formal training and on-the-job training commensurate with experience. Mechanisms should be established to perpetuate these training requirements.</i> | | NRR (IIPB) | | |
| 3.3.5(1) | <i>Maintain expertise in the subject areas by ensuring that NRC inspector training includes: (1) boric acid corrosion effects and control; and (2) PWSCC of nickel based alloy nozzles.</i> | | NRR (IIPB) | | |
| 3.1.2(1) | <i>Revise NRC processes to require short-term and long-term follow-on verification of licensee actions to address significant generic communications (i.e., bulletins and GLs).</i> | Medium | NRR (RORP) | | |
| 3.1.2(2) | <i>Establish review guidance for accepting owners group and industry resolutions for generic communications and generic issues.</i> | Medium | NRR (RPRP, IIPB) | | |

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| 3.2.3(1) | <i>Review a sample of NRC safety evaluations of owners' group submissions to identify whether intended actions that supported the bases of the NRC's conclusions were effectively implemented.</i> | | NRR (DLPM, IIPB) | | |
| 3.2.3(2) | <i>Develop general inspection guidance for the periodic verification of the implementation of owners groups' commitments made on behalf of their members.</i> | | NRR (DLPM, IIPB) | | |
| 3.1.2(5) | <i>Conduct follow-on verification of licensee actions associated with a sample of other significant generic communications, with emphasis on those involving generic communication actions that are primarily programmatic in nature.</i> | Medium | NRR (RORP, IIPB) | | |
| 3.1.3(2) | <i>Conduct follow-on verification of licensee actions pertaining to a sample of resolved GIs.</i> | | NRR (DLPM, IIPB) | | |
| 3.1.2(3) | <i>Establish process guidance to ensure that generic requirements or guidance are not inappropriately affected when making unrelated changes to processes, guidance, etc. (e.g., deleting inspection procedures that were developed in response to a generic issue).</i> | Low | NRR (IIPB) | | |
| 3.1.3(1) | <i>Evaluate, and revise as necessary, the guidance for proposing candidate GIs.</i> | Low | RES | | |

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| 3.3.4(7) | <i>Reassess the basis for the cancellation of the inspection procedures that were deleted by Inspection Manual Chapter, Change Notice 01-017 to determine whether there are deleted inspection procedures that have continuing applicability. Reactivate such procedures, as appropriate.</i> | Low | NRR (IIPB) | | |

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| 3. | Evaluation of Inspection, Assessment, and Project Management Guidance | | | | |
| 3.2.5(2) | <i>Revise inspection guidance to provide assessments of: (1) the safety implications of long-standing, unresolved problems; (2) corrective actions phased in over several years or refueling outages; and (3) deferred modifications.</i> | High | NRR (IIPB) | | |
| 3.3.5(4) | <i>Develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation.</i> | High | NRR (IIPB) | | |
| 3.3.7(2) | <i>Establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented.</i> | High | NRR (DLPM) | | |
| APP. F | <i>Conduct an effectiveness review of the actions taken in response to past lessons-learned reviews.</i> | Medium | EDO | | |
| 3.3.4(5) | <i>Review the range of NRC baseline inspections and plant assessment processes, as well as other NRC programs, to determine whether sufficient programs and processes are in place to identify and appropriately disposition the types of problems experienced at DBNPS. Additionally, provide more structured and focused inspections to assess licensee employee concerns programs and safety conscious work environment.</i> | Medium | NRR (IIPB) | | |
| 3.2.5(1) | <i>Develop inspection guidance to assess scheduler influences on outage work scope.</i> | Medium | NRR (IIPB) | | |

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| 3.3.1(2) | <i>Develop inspection guidance to assess repetitive or multiple TS action statement entries, as well as, the radiation dose implications associated with repetitive tasks.</i> | Medium | NRR (IIPB) | | |
| 3.3.3(1) | <i>As an additional level of assurance, identify alternative mechanisms to independently assess plant performance as a means of self-assessing NRC processes. Once identified, the feasibility of such mechanisms should be determined.</i> | Medium | NRR (IIPB and EDO) | | |
| 3.3.7(1) | <i>Reinforce expectations for the implementation of guidance in the PM handbook for PM site visits, coordination between PMs and resident inspectors, and PM assignment duration. Reinforce expectations provided to PMs and their supervisors regarding the questioning of information involving plant operation and conditions. Also, strengthen the guidance related to the license amendment review process to emphasize the need to consider current system conditions, reliability, and performance data in SERs. In order to improve the licensing decision-making process, the NRC should strengthen its guidance regarding the verification of information provided by licensees.</i> | Medium | NRR (DLPM) | | |

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| 3.3.4(1) | <i>Review inspection guidance pertaining to refueling outage activities to determine whether the level of inspection effort and guidance are sufficient given the typically high level of licensee activity during relatively short outage periods. The impact of extended operating cycles on the opportunity to inspect inside containment and the lack of inspection focus on passive components should be reviewed. This review should also determine whether the guidance and level of effort are sufficient for inspecting other plant areas which are difficult to access or where access is routinely restricted.</i> | Medium | NRR (IIPB) | | |
| 3.3.4(4) | <i>Revise IMC 0350 to permit implementation of IMC 0350 without first having established that a significant performance problem exists, as defined by the ROP.</i> | Medium | NRR (IIPB) | | |
| 3.3.2(2) | <i>Revise the overall PI&R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. Enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed.</i> | Low | NRR (IIPB) | | |
| 3.3.2(3) | <i>Provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews.</i> | Low | NRR (IIPB) | | |
| 3.3.2(4) | <i>Revise inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding.</i> | | | | |

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| 3.3.3(2) | <i>Perform a sample review of the plant assessments conducted under the interim PPR assessment process (1998-2000) to determine whether there are plant safety issues that have not been adequately assessed.</i> | Low | NRR (IIPB) | | |
| 3.3.4(6) | <i>Provide ROP refresher training to managers and staff members.</i> | Low | NRR (IIPB) | | |
| 3.3.5(2) | <i>Reinforce IMC 0102 expectations regarding regional manager visits to reactor sites.</i> | Low | NRR (IIPB) | | |
| 3.3.5(3) | <i>Establish measurements for resident inspector staffing, including the establishment of program expectations to satisfy minimum staffing levels.</i> | Low | NRR (IIPB) | | |
| 3.3.7(5) | <i>Fully implement Office Letter 900, "Managing Commitments Made by Licensees to the NRC," or revise the guidance if it is determined that the audit of licensee's programs is not required. Further, determine whether the periodic report on commitment changes submitted by licensees to the NRC should continue to be submitted and reviewed.</i> | Low | NRR (DLPM) | | |

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| 4. Assessment of Barrier Integrity Requirements | | | | | |
| 3.2.1(1) | <i>Improve the requirements pertaining to RCS unidentified leakage and RCPB leakage to ensure that they are sufficient to: (1) provide the ability to discriminate between RCS unidentified leakage and RCPB leakage; and (2) provide reasonable assurance that plants are not operated at power with RCPB leakage.</i> | High | RES(DET) | | |
| 3.1.5(1) | <i>Determine whether PWR plants should install on-line enhanced leakage detection systems on critical plant components, which would be capable of detecting leakage rates of significantly less than 1 gpm.</i> | | | | |
| 3.2.1(2) | <i>Develop inspection guidance pertaining to RCS unidentified leakage that includes action levels to trigger increasing levels of NRC interaction with licensees in order to assess licensee actions in response to increasing levels of unidentified RCS leakage. The action level criteria should identify adverse trends in RCS unidentified leakage that could indicate RCPB degradation.</i> | | | | |
| 3.3.3(3) | <i>Continue ongoing efforts to review and improve the usefulness of the barrier integrity PIs. These review efforts should evaluate the feasibility of establishing a PI which tracks the number, duration, and rate of primary system leaks that have been identified but not corrected.</i> | | RES (DRAA) | | |

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| 3.2.1(3) | <i>Inspect plant alarm response procedure requirements for leakage monitoring systems to assess whether they provide adequate guidance for the identification of RCPB leakage.</i> | | NRR (IIPB) | | |
| 3.3.4(9) | <i>Review PWR plant TS to identify plants that have non-standard RCPB leakage requirements and should pursue changes to those TS to make them consistent among all plants.</i> | | NRR (DRIP) | | |
| 3.3.7(3) | <i>Evaluate the adequacy of analysis methods involving the assessment of risk associated with passive component degradation, including the integration of the results of such analyses into the regulatory decision making process.</i> | Medium | RES | | |