

**DAVIS-BESSE LESSONS LEARNED TASK FORCE  
RECOMMENDATIONS REGARDING INSPECTION,  
ASSESSMENT, AND PROJECT MANAGEMENT GUIDANCE**

<p><u>TAC No.</u> MB7281 MB7726</p>	<p><u>Description</u> Develop Action Plan Evaluation of Inspection and Assessment Guidance</p>	<p>Last Update: 09/30/04 Lead Division: DIPM Supporting Division: DLPM Supporting Office: Regions</p>
---	--	---

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part 1 - Evaluation of Inspection Guidance Related To Problem Identification and Resolution</b>			
<p>The NRC should revise its 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. [LLTF 3.2.5.(2) High]</p> <p>The NRC should revise the overall PI&amp;R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. The NRC should enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed. [LLTF3.3.2.(2) Low]</p> <p>The NRC should provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews [LLTF3.3.2.(3) Low]</p> <p>The NRC should revise its inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding. [LLTF3.3.2.(4) Low]</p>			
1. Make changes to IP 71152 to require annual follow-up of three to six issues.	01/02 (C)	DIPM	
2. PI&R focus group assess lessons learned recommendations.	03/03 (C)	DIPM	Regions

Milestone	Date (T=Target) (C=Complete)	Lead	Support
3. Develop draft procedure changes based on PI&R group recommendations and provide to regions for review.	04/03 (C) ML031390010	DIPM	Regions
4. Provide training on procedure changes.	09/03 (C)	DIPM	
5. Issue procedure changes.	09/03 (C)	DIPM	
<b>PART 2 - Evaluation of IMC 0350 Guidance</b>			
The NRC should develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation. [LLTF3.3.5.(4) High]			
1. Assess past and present IMC 0350 data and associated inspection approaches.	06/03 (C) MI031890873	DIPM	Regions
2. Develop enhanced structure to the inspection approach used for IMC 0350 plants.	08/03 (C) ML032250336	DIPM	Regions
3. Develop draft revisions to IMC and issue for regional comment.	10/03 (C)	DIPM	
4. Issue procedure revisions.	12/03 (C)	DIPM	
5. Include estimated resources for IMC 0350 plants into budget cycles.	12/03 (C) ML033010385	DIPM	
<b>Part 3 - Evaluation of Project Management Guidance</b>			
The NRC should establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented. [LLTF 3.3.7.(2) High]			
1. The DLPM Handbook will be updated with a new section that addresses documenting staff decisions.	02/03 (C)	DLPM	
2. A training package emphasizing compliance with the requirements of MD 3.53 will be developed and distributed to all Offices and regions.	04/03 (C) ML030300067	DLPM	

Milestone	Date (T=Target) (C=Complete)	Lead	Support
3. Issue Office Instruction on Generic Communications	06/03 (C) ML023170311	DRIP	DLPM
4. Conduct effectiveness review: a. Follow up with Offices and Regions to determine effectiveness of training.  b. Review sample of generic communication closeouts for appropriate documentation.  c. Complete additional training and procedure revisions as indicated by effectiveness review.	07/04 (C) ML041200528  06/04 (C) ML041810128  03/05(T)	DLPM  DLPM  DLPM	

Description: The Davis Besse Lessons Learned Task Force (LLTF) identified several issues concerning the NRC's oversight, inspection, and project management guidance. The LLTF recommended that changes be made to the NRC's inspection program to ensure that sufficient inspections are conducted of long-standing unresolved problems, that guidance be developed to assess the impacts of Inspection Manual Chapter 0350 on regional resource allocations, and that guidance be developed to ensure that decisions to allow deviations from agency guidelines in generic communications are adequately documented.

Historical Background: The Davis Besse LLTF conducted an independent evaluation of the NRC's regulatory processes related to assuring reactor vessel head integrity in order to identify and recommend areas of improvement applicable to the NRC and the industry. A report summarizing their findings and recommendations was published on September 30, 2002. The report contains several consolidated lists of recommendations. The LLTF report was reviewed by a Review Team (RT), consisting of several senior management personnel appointed by the EDO. The RT issued a report on November 26, 2002, endorsing all but two of the LLTF recommendations, and placing them into four overarching groups. On January 3, 2003, the EDO issued a memo to the Director, NRR, and the Director, RES, tasking them with a plan for accomplishing the recommendations. This action plan addresses the Group 3 recommendations of the Davis-Besse Lessons Learned Task Force regarding inspection, assessment, and project management guidance. As directed by the EDO's memo, this action plan includes the 3 high priority recommendations in the "Evaluation of Inspection, Assessment, and Project Management Guidance" grouping. In addition, three low priority recommendations are included since they are closely related to the high priority recommendations and will be accomplished in conjunction with the work necessary to resolve the high priority items. The LLTF recommendations are also listed in the attached Table 1.

Proposed Actions: Parts 1, 2, and 3 of this action plan are unrelated and will be worked as three independent efforts. The recommendations associated with the inspection program will be reviewed by the Problem Identification and Resolution (PI&R) focus group which is made up of headquarters and regional representatives. The focus group will assess whether changes to

the current PI&R inspection approach are warranted. Procedure changes will then be made as appropriate, and inspector training will be conducted.

The recommendation associated with IMC 0350 will be assessed by evaluating the previous inspection approaches used and associated resource expenditures for plants that entered the IMC 0350 process. The staff will then attempt to better define a more enhanced inspection framework for a plant that enters IMC 0350. Once this additional inspection guidance is completed, a better estimate of resources will be made, and resources for IMC 0350 will be included in budget projections.

Project management guidance regarding documentation when accepting deviations from generic communications recommendations will be incorporated into the DLPM handbook and into training materials to be distributed to all Offices and Regions. An Office Instruction will be issued to provide guidance on preparation, issuance and closeout of generic communications.

#### Originating Documents:

Memorandum from Travers, W.D. to Collins, S. and Thadani, A. C., dated January 3, 2003, "Actions Resulting From The Davis-Besse Lessons Learned Task Force Report Recommendations." (ML023640431)

Memorandum from Paperiello, C.J. to Travers, W.D., dated November 26, 2002, "Senior Management Review of the Lessons-Learned Report of the Davis-Besse Nuclear Power Station Reactor Pressure Vessel Head." (ML023260433)

Memorandum from Howell, A.T. to Kane, W.F., dated September 30, 2002, "Degradation of the Davis-Besse Nuclear Power Station Reactor Pressure Vessel Head Lessons-Learned Report." (ML022740211)

Regulatory Assessment: It is not anticipated that this action plan will result in any additional regulatory requirements on licensees. The plan focuses on what enhancements should be made to existing inspection and project management guidance to ensure better scope, efficiency, and documentation of such activities.

Current Status: Part 1 milestones are complete. The procedure changes have been issued and a training module was placed on the web-based "Read and Sign" training for inspectors. Inspection Procedure (IP) 71152, "Identification and Resolution of Problems," was revised to require the resident inspector to perform a screening review of each item entered into the corrective action program. The intent of this review is to be alert to conditions such as repetitive equipment failures or human performance issues that might warrant additional follow-up through other baseline inspection procedures. IP 71152 was also revised to require a semi-annual review to identify trends that might indicate the existence of a more significant safety issue. Included within the scope of this review are repetitive or closely related issues that may have been documented by the licensee outside the normal corrective action program, such as in trend reports or performance indicators, major equipment problem lists, repetitive and/or rework maintenance lists, departmental problem/challenges lists, system health reports, quality assurance audit/surveillance reports, self-assessment reports, maintenance rule assessments, or corrective action backlog lists. Finally, IP 71152 was revised to include enhanced requirements regarding routine PI&R reviews conducted by the resident inspectors, biennial reviews of longstanding issues, and biennial reviews of licensees' operating experience issues.

To address the issue of deferred modifications, the staff revised IP 71111.15, "Operability Evaluations." The objective of this procedure is to review operability evaluations affecting mitigating systems and barrier integrity to ensure that operability is properly justified and the component or system remains available, such that no unrecognized increase in risk has occurred. The procedure was revised to include deferred modifications as one of the areas an inspector can assess to ensure that structures, systems, and components are capable of performing their design function.

Part 2 milestone activities have been completed. The Inspection Program Branch completed an evaluation of the IMC 0350, "Oversight of Operating Reactor Facilities in a Shutdown Condition with Performance Problems," process in June 2003, (ML031890873). It identified the need for specifically budgeting resources for IMC 0350 inspections and providing prescriptive inspection guidelines for the process. The budget estimate was increased for FY2005 and beyond (ML033010385) to account for one IMC 0350 plant per year. IMC 0350 was revised in December 2003, to provide additional inspection guidelines.

The Part 3 milestones associated with issuing guidance were completed as scheduled. The milestones to follow up on the effectiveness of training and to perform a review of a sample of recent generic communications for proper closeout documentation are complete. The effectiveness evaluations indicated a need for additional action to improve guidance documents and to conduct additional training. This was added to the action plan.

Contacts:

NRR Lead for this action plan: Stuart Richards, DIPM, 415-1257  
Overall Lead for DB LLTF response: Brendan Moroney, DLPM, 415-3974

References:

Inspection Manual 0350, "Oversight of Operating Reactor Facilities in an Extended Shutdown as a Result of Significant Performance Problems."

**Table 1**  
**LLTF Report Recommendations Included in This Action Plan**

<b>RECOMMENDATION NUMBER</b>	<b>RECOMMENDATION</b>	<b>PRIORITY</b>
3.2.5.(2)	The NRC should revise its 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.	High
3.3.2.(2)	The NRC should revise the overall PI&R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. The NRC should enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed.	Low
3.3.2.(3)	The NRC should provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews. [3.3.2.(3)]	Low
3.3.2.(4)	The NRC should revise its inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding.	Low
3.3.5.(4)	The NRC should develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation.	High
3.3.7.(2)	The NRC should establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented.	High