BASELINE INSPECTION PLAN FOR D. C. COOK

"IDENTIFICATION AND RESOLUTION OF PROBLEMS"
Report 05000315/2003015; 05000316/2003015

Inspection Objectives

This inspection fulfills the baseline inspection program requirements for the biennial focused IDENTIFICATION AND RESOLUTION OF PROBLEMS (PI & R) inspection. The biennial inspection of problem identification and resolution is intended to complement and expand upon the separate Routine Review of Identification and Resolution of Problems In Plant Status and Inspectable Area Procedures that will be continually performed throughout the year.

The PI&R inspection objectives are:

- To provide for early warning of potential performance issues that could result in crossing thresholds in the action matrix
- To help the NRC gage supplemental response should future action matrix thresholds be crossed
- To provide insights into whether licensees have established a safety conscious work environment
- To allow for follow-up of previously identified compliance issues (e.g. NCV's)
- To provide additional information related to cross cutting issues that can be used in the assessment process
- To determine whether licensees are complying with NRC regulations regarding corrective action programs
- To follow-up on corrective actions associated with the degraded cornerstone identified in NRC inspection reports 50-315/316/2003-004 and 50-315/316/2003-009 and the fish intrusion event identified in NRC inspection report 50-315/316/2003-008.

Inspection Dates: Onsite December 8-12 and 15-19, 2003

Exit: December 19, 2003, 9:00 a.m. (Tentative)

Applicable Inspection Procedures

IP 71152B "Identification and Resolution of Problems" dated 09/08/2003

Prepared By: ***/RA/*** 12/3/03
A. Dunlop, Inspector

Approved By: ***/RA/*** 12/3/03
E. Duncan, DRP Branch Chief

Reviewed By: ***/RA by Mel Holmberg Acting for/*** 12/3/03
D. Hills, DRS Branch Chief

INSPECTION PLAN DETAILS

Inspectors: A. Dunlop, Lead Inspector, Reactor Engineer
S. Sheldon, Reactor Engineer
I. Netzel, Resident Inspector, D. C. Cook
F. Ramirez, Reactor Engineer, DRP

I. Detailed Inspection Schedule

Advance Planning Preparation: June 12, 2003, Request List to licensee

Inspection Preparation on site and at Region III Offices: December 1 - 5, 2003

Onsite Inspection: December 8-12 and 15-19, 2003

Entrance Meeting: December 8, 2003, 11:00 a.m.

Exit Meeting: December 19, 2003, 9:00 a.m. (Tentative)

Preparation of Inspection Report:

- Input Due: January 9, 2004
- Draft Completed: January 23, 2004
- Management Review Completed and Report Issued: On or before February 2, 2004

II. Specific Inspection Activities

Information Collection

As part of the inspection advance planning preparation, the lead inspector has contacted the licensee, requested listings of pertinent information, and arranged for necessary information to be provided. The information requested of the licensee will be sent in a separate email (Since the inspection schedule was changed, the licensee provided an updated document list). If during the preparation time additional information is determined to be necessary, this will be conveyed to the licensee as expeditiously as possible.

Preparation Week

Between December 1 - 5, 2003, the inspectors will review the materials provided by the licensee, the inspection procedure, recently issued PI&R reports, documentation guidance in Appendix D to IMC 0612, and NRC inspection reports that were issued in the past year. The following should be included in the review:

1. Review licensee administrative procedures that control the identification, evaluation, and resolution of problems.

2. Review information obtained from the licensee for in-office review.

3. Review procedures and documentation on licensee efforts to identify, resolve and prevent structure, system and component (SSC) performance problems.

4. Review all NRC inspection reports, issued since the last biennial PI&R inspection, and:

   A. Determine the extent to which all cornerstones have been sampled by routine reviews of licensee PI&R activities and determine if additional PI&R samples are warranted in any cornerstone(s).

   B. Determine the extent to which licensee actions to NCVs have been sampled by routine reviews of licensee PI&R activities.

   C. Identify any trends or patterns in corrective action program issues or performance which may warrant additional sampling to confirm. For example, a series of issues associated with "failure to follow procedures" within one cornerstone may indicate a corrective action performance deficiency within a portion of the licensee's organization or a series of issues associated with failure to follow procedures in multiple cornerstones may indicate a broader concern. Also, a lack of licensee identified corrective action issues within a particular organization may be indicative of a problem with the identification threshold. Consider the need to follow-up on performance trends documented as a result of the trend review.

5. Based on the planning review, identify a sample of licensee corrective actions for review. The samples chosen for review should include a range of issues including:

   - Licensee identified issues (including issues identified during audits or self assessments)
   - NRC identified issues
   - Issues related to NCVs (mandatory to review response to a sample of NCVs unless no NCVs were issued in the cornerstone)
   - Issues identified through NRC generic communications
   - Issues identified through industry operating experience exchange mechanisms (including Part 21 reports, NSSS vendor reports, EPRI reports, experience reports from similar facilities, LERs)
   - Specific or cross cutting issues identified by safety review committees or other management oversight mechanisms
   - Issues identified through employee concerns programs.

No specific number of previously reviewed or additional samples is specified. Rather, the biennial inspection team leader should choose as many examples as warranted to complement the routine PI&R inspections and ensure a sufficient basis for evaluating the effectiveness of the licensee's PI&R program. An effort should however be made to maintain the total hours expended in completing this procedure to within the estimated level of resources. (212 - 288 hours of direct inspection effort)

III. Most Risk Significant Systems and Components for D. C. Cook

Lists to be provided by the licensee.

Inspection Conclusions

- By reviewing a sufficient number and breadth of samples and compare them to Inspection Procedure 71152, section 03.03 c “Performance Attributes,” the inspection team should be able to develop insights into the effectiveness of the licensee's corrective action program. Compare the result of the team's review of corrective action issues with licensee performance reviews, including specific licensee reviews of the corrective action program. Determine whether licensee reviews are consistent with the NRC review of corrective action issues (from baseline inspection reports).

    - At the completion of inspection activities, the team should develop a clear and concise discussion of the results of their review. This discussion should be supported by the inspection activities conducted over the assessment cycle including both routine and biennial inspection of PI&R activities.

IV. HRMS and Time Charge Information

The 71152B inspection procedure calls for 250 ± 38 hours of direct inspection effort for problem identification and resolution. The direct inspection hours do not include time spent in travel, entrance or exit meetings, debriefing the residents, checking on e-mail, or keeping track of hours to correctly credit them. However, it does include time spent in team meetings and in preparing for team meetings. All time is to be charged to IP "71152B" with an IPE of "BI."

The hours of direct inspection effort equate to about 72 hours for each of the four inspectors over 2 weeks - (i.e. basically full time). Because it's recognized that activities other than just direct inspection will occur, the lead inspector has requested authorization of 6 hours of overtime for each onsite week for each inspector. The overtime is to only be used to meet the inspection hour requirements and must be claimed on HRMS. If it appears that the scope of the inspection cannot be met within the allotted hours, inform the lead inspector so that RIII management can be notified to obtain authorization for additional hours.

V. Findings

Any findings resulting from the inspection will be reviewed using the current Significance Determination Process (SDP), and will be discussed with an SRA.

VI. Documentation

The report will be prepared in accordance with the guidance in IMC 0612 and with Appendix D to IMC 0612. The report format will be modeled after recently issued PI&R inspection reports that were generated with that format. Issues which the inspector deems meet the criteria for report writeups shall be discussed with the team leader prior to preparing an input.

Because of the limitations placed on writing detailed input, documents reviewed shall be included in the document list in accordance with the guidance in example 2 of the memo dated 06/25/03 “Guidance on the List of Documents Reviewed.” Each individual inspector shall maintain a list of documents reviewed (including appropriate titles, revision numbers etc.) Corrective action documents generated as a result of the inspector's questions shall be listed separately from corrective action documents that were in the licensee's system prior to the inspection.

VII. Interface and Coordination Meetings

Team Meetings

Team meetings will be held daily at 4:00 p.m. starting on Tuesday, December 9. The meetings will run no longer than one hour in length. The intent is to allow each inspector, including the team lead, about 10 minutes to discuss the day's activities, with 10 minutes for team focus issues.

Meetings with the Licensee

An entrance meeting will be held on December 8, 2003, at 11:00 a.m.

Daily debriefings with the licensee will start Wednesday December 10, 2003, time 5:00 p.m. These daily meetings normally will be between the lead inspector and the licensee; individual team member attendance may be needed on occasion to elaborate on a complicated issue.

The inspectors will conduct the exit meeting on December 19, 2003, at 9:00 a.m. (Tentative)

VIII. Specific Inspection Assignments

The following initial assignments are intended to provide a starting point and are subject to change (i.e. use of SDP for findings would decrease allotted time).

All

- Through interaction and interviews with licensee personnel during the course of the inspection, assess whether conditions exist that would challenge the establishment of a safety conscious work environment.

- Assess overall risk significance associated with combinations of items in corrective action backlog.

- Review and assess licensee response to selected NCVs and/or violations as identified by lead inspector (at least one in each cornerstone as applicable)

Ivy Netzel - review and assess the following:

- focus on Operations
- use of industry operating experience information (OPEX) including lessons learned from Davis Besse.
- licensee audits and self assessments in the Operations area
- condition reports written since January 1, 2002, pertaining to a selected risk significant system or scenario to be determined at the beginning of the inspection. Are issues that affect equipment availability being captured for inclusion in PI and maintenance rule data? (Engineered Safety Features Actuation System (ESFAS)) Compare the findings with the most recent licensees reviews.

Stuart Sheldon - review and assess the following:

- Engineering/Maintenance focus
- corrective actions associated with the degraded cornerstone identified in NRC inspection reports 50-315/316/2003-004 and 50-315/316/2003-009
- condition reports written since January 1, 2002, pertaining to a selected risk significant system or scenario to be determined at the beginning of the inspection. Are issues that affect equipment availability being captured for inclusion in PI and maintenance rule data? (Reactor Protection System (RPS)) Compare the findings with the most recent licensees reviews.
- Audits and self assessments in Engineering and Maintenance

Andy Dunlop - review and assess the following:

- focus on Radiation Protection, Chemistry, Emergency Preparedness, and Safeguards
- classification/corrective actions for category X condition reports
- corrective actions for previous PI&R issues identified in NRC inspection report 50-315/316/2002-004
- self assessment of Corrective Action Program
- corrective actions associated with Condition Reports for Significant Conditions Adverse to Quality generated for human performance errors
    - audits and self assessments in Radiation Protection, Chemistry, Emergency Preparedness, and Safeguards
- Employee Concerns Program (ECP)

Frances Ramirez - review and assess the following:

- condition reports written since January 1, 2002, pertaining to a selected risk significant system or scenario to be determined at the beginning of the inspection. Are issues that affect equipment availability being captured for inclusion in PI and maintenance rule data? (Residual Heat Removal System) Compare the findings with the most recent licensees reviews.
- fish intrusion event corrective actions identified in NRC inspection report 50-315/316/2003-008
- ECP (lead)