UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

October 23, 2000

EA-00-209

Gregory M. Rueger, Senior Vice President
and General Manager
Nuclear Power Generation Bus. Unit
Pacific Gas and Electric Company
Nuclear Power Generation, B32
77 Beale Street, 32nd Floor
P.O. Box 770000
San Francisco, California 94177

SUBJECT: DIABLO CANYON INSPECTION REPORT NO. 50-275/00-12; 50-323/00-12

Dear Mr. Rueger:

This refers to the routine resident inspection conducted from August 13 through September 23, 2000, and a radiation protection inspection conducted from July 24-28, 2000 at the Diablo Canyon Nuclear Power Plant, Units 1 and 2 facility. The enclosed report presents the results of this inspection. The results of this inspection were discussed on September 20 and October 6, 2000, with David H. Oatley and members of your staff.

This inspection was an examination of activities conducted under your license as they relate to safety, compliance with the Commission's rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

One issue involving the classification of a radioactive Class C waste shipment was evaluated under the significance determination process and was determined to be of very low safety significance (green). This issue was entered into your corrective action program and is discussed in the summary of findings and in the body of the attached inspection report.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

William B. Jones, Chief
Project Branch E
Division of Reactor Projects

Docket Nos.: 50-275
50-323
License Nos.: DPR-80
DPR-82

Enclosure:
NRC Inspection Report No.
50-275/00-12; 50-323/00-12

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Only inspection reports to the following:
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket Nos.:	50-275 50-323
License Nos.:	DPR-80 DPR-82
Report No.:	50-275/00-12 50-323/00-12
Licensee:	Pacific Gas and Electric Company
Facility:	Diablo Canyon Nuclear Power Plant, Units 1 and 2
Location:	7 ½ miles NW of Avila Beach Avila Beach, California
Dates:	July 24 through 28, and August 13 through September 23, 2000
Inspectors:	D. L. Proulx, Senior Resident Inspector D. G. Acker, Resident Inspector J. F. Melfi, Project Engineer, Region IV G. F. Larkin, Reactor Inspector, Region IV J. B. Nicholas, Ph.D., Senior Health Physicist, Division of Reactor Safety, Region IV
Approved By:	W. B. Jones, Chief, Project Branch E Division of Reactor Projects

ATTACHMENTS:

Attachment 1: Supplemental Information

Attachment 2: NRC's Revised Reactor Oversight Process

SUMMARY OF FINDINGS

IR 05000-275-00-12, IR 05000-323-00-12, on 07/24-28/00 and 08/13-09/23/00, Pacific Gas and Electric. Co., Diablo Canyon Nuclear Power Plant Units 1 and 2. Integrated resident and regional report; radioactive material processing and transportation.

The report covers a 6-week period of resident inspection and announced inspections by a regional radiation specialist, a regional inspector and two regional project inspectors. In the reactor safety area the cornerstones inspected included initiating events, mitigating systems, and barrier integrity. In the radiation safety area the cornerstone inspected was public radiation safety. One green issue of very low significance was identified during this inspection. The significance of most/all findings is indicated by their color (green, white, yellow, or red) using the IMC 0609, "Significance Determination Process" (SDP).

Cornerstone: Public Radiation Safety

- Green. On December 8, 1999, the Chem-Nuclear Systems radioactive waste disposal facility accepted radioactive waste Shipment RWS-99-004 without comment and buried the radioactive waste in a near-surface burial area. The licensee had shipped the Class C waste to Chem-Nuclear Systems radioactive waste disposal facility in accordance with 10 CFR 61.55, Table 1. On April 21, 2000, a licensee audit identified a calculation error associated with the waste classification of Shipment RWS-99-004. This error resulted in the shipment not meeting Chem-Nuclear System's acceptance criteria. However, there was no violation of NRC requirements (EA-00-209).

  Although not a violation of NRC requirements, the failure to meet Chem-Nuclear System's acceptance criteria in this instance was characterized as a "green" finding. Based on the public radiation safety significance determination process, the issue had very low safety significance because the Carbon-14 concentration in the radioactive waste did not exceed the value in 10 CFR 61.55, Table 1, when calculated in accordance with 10 CFR 61.55 (a)(8). This finding is in the licensee's corrective action program as Action Requests A0506728 and A0508956 (Section 2PS2).

Report Details

Summary of Plant Status

Diablo Canyon Unit 1 began this inspection period at 100 percent power and continued to operate at that level until the end of the inspection period.

Diablo Canyon Unit 2 began this inspection period at 100 percent power. On September 4, 2000, operators decreased Unit 2 power to 50 percent following identification of a leaking extraction steam line sleeve. As the leak worsened, several other extraction steam line sleeves were damaged. On September 5 operators shutdown Unit 2 to Mode 3 (Hot Standby) to affect repairs. Following repairs to the extraction steam line sleeves, operators placed Unit 2 in Mode 2 (Startup) and continued to Mode 1 (Power Operation) on September 14. Power ascension continued until 100 percent power was achieved on September 17. Unit 2 continued to operate at that level until the end of the inspection period.

1. REACTOR SAFETY
Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

a. Inspection Scope

The inspectors reviewed appropriate plant documents to verify that continued operability of the systems during storm conditions had been appropriately addressed. The inspectors also reviewed Operating Order O-28, “Intake Management,” Revision 6, which discusses licensee actions for debris loading of the intake structure. The inspectors assessed licensee evaluation worksheets that estimate the potential debris loading on intake screens. The inspectors also toured the plant intake structure to assess the capability of the debris removal systems.

b. Issues and Findings

There were no findings identified during the inspection.

1R02 Evaluations of Changes, Tests, or Experiments (71111.02)

Vendor Inspections

a. Inspection Scope

In June 2000 the Pacific Gas and Electric Corporate Purchasing Department in San Francisco, California eliminated the position of Director Vendor Quality Control. The position of Director Vendor Quality Control was included in the quality assurance program documents and is shown in Figure 17.1-1 of the Final Safety Analysis Report. The inspectors reviewed the personnel changes that were made and the licensing requirements associated with changes to the Final Safety Analysis Report and quality assurance program.

b. Issues and Findings

On July 12, 2000, nuclear quality services (NQS) personnel became aware of changes to the vendor quality control program and notified corporate purchasing of the requirements for changing the quality assurance program and Final Safety Analysis Report. On July 28, NQS personnel issued Action Request A0512039 to document that the changes made were not in accordance with Procedure OM1.ID1, "Functions, Responsibilities, and Authorities," Revision 2. Procedure OM1.ID1 required that an evaluation of changes to quality assurance programs be made prior to implementing the changes, to ensure that the changes were consistent with the requirements of 10 CFR 50.54(a).

On August 14, 2000, NQS issued Action Request A0512810 to assign corrective actions and track completion. NQS personnel issued a hold on all vendor quality assurance activities and reviewed the records of inspections performed after the director position was eliminated. NQS determined that no quality related vendor inspections had occurred. NQS personnel informed the inspectors that Pacific Gas and Electric planned to have the vendor quality control program assigned to a different organization and that they believed that all the planned program changes could be made without requiring NRC review and approval, consistent with 10 CFR 50.54(a). The inspectors reviewed the changes with the licensee and considered the actions acceptable.

The failure to comply with Procedure OM1.ID1 was a violation of Technical Specification 5.4.1.a. However, because no quality related vendor inspections were accomplished during the time the violation existed, the inspections considered that the failure to follow Procedure OM1.ID1 was a minor violation not subject to formal enforcement action.

1R04 Equipment Alignments (71111.04Q)

Partial System Walkdowns

a. Inspection Scope

The inspectors performed a partial system walkdown of Diesel Engine Generators 1-1 and 1-2 on September 19, when Diesel Engine Generator 1-3 was unavailable due to low lube oil temperature. The low lube oil temperature resulted from an upstream breaker that failed after an air compressor motor shorted. The inspectors checked the valve lineups for the air start and fuel systems, electric power availability from offsite power.

b. Issues and Findings

There were no findings identified during the inspection.

1R05 Fire Protection (71111.05)

Monthly Routine Inspection

a. Inspection Scope

The inspectors performed fire protection walkdowns to assess the material condition of plant fire protection equipment and proper control of transient combustibles. Specific risk significant areas inspected included the intake structure, the radiologically controlled area of the auxiliary building, and the safety-related areas of the turbine building.

b. Issues and Findings

There were no findings identified during the inspection.

1R11 Operator Requalification (71111.11)

a. Inspection Scope

On August 29, 2000, the inspectors observed operator performance during simulator scenarios for requalification. The scenarios included a failure of a component cooling water pump, a failure of reactor protection equipment, a degraded condenser, a faulted steam generator, and a loss of heat sink. The inspectors used Procedures OP AP-11, "Malfunction of the Component Cooling Water System," Revision 17; OP AP-7, "Degraded Condenser," Revision 23; OP AP-5, "Malfunction of Protection or Control Channel," Revision 16; E-0, "Reactor Trip or Safety Injection," Revision 24; E-2, "Faulted Steam Generator Isolation," Revision 11; and FR-H.1, "Response to Loss of Secondary Heat Sink," Revision 17 as guidance. The inspectors also attended the licensee critique of operator performance.

b. Issues and Findings

There were no findings identified during the inspection.

1R12 Maintenance Rule Implementation (71111.12)

Routine Reviews

a. Inspection Scope

The inspectors reviewed the maintenance rule implementation for several equipment performance problems, including Auxiliary Building Exhaust Fan E-5 failure to start, Action Request A0513417

b. Issues and Findings

There were no findings identified during the inspection.

1R13 Maintenance Risk Assessment and Emergent Work Control (71111.13)

.1 Risk Assessments

a. Inspection Scope

Throughout the inspection period, the inspectors reviewed daily and weekly work schedules to determine when risk significant activities were scheduled. The inspectors reviewed selected activities regarding risk evaluations and overall plant configuration control. The activities reviewed were associated with a September 21, 2000, preventative maintenance on safety injection system Valve SI-8807A.

b. Issues and Findings

There were no findings identified during the inspection.

.2 Emergent Work

a. Inspection Scope

The inspectors reviewed a condition where a Diesel Engine Generator 1-3 air compressor motor electrical short-circuit caused other components to become inoperable. The circuit protection was provided by an upstream 100-amp breaker rather than the motor 30-amp feeder breaker. The inspectors reviewed the breaker coordination and instantaneous over current trip overlap settings and the 100 amp breaker bench test results with the licensee. Replacement of the 100-amp breaker, as authorized by Work Order M00226901, was also reviewed.

b. Issues and Findings

There were no findings identified during the inspection.

1R14 Personnel Performance During Nonroutine Plant Evolutions and Events (71111.14)

a. Inspection Scope

The inspectors observed operator performance during Unit 2 reactor startup on September 14, following a short outage to repair extraction steam lines in the condenser. The inspectors used Procedure STP R-13, “Estimated Critical Position,” Revision 13 and OP-L2, “Hot Standby to Startup Mode,” Revision 26 to aid in the evaluation.

b. Issues and Findings

There were no findings identified during the inspection.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following operability evaluations and supporting documents:

- NonConformance Report N0002115, Technical Specification administrative controls for containment isolation valves may not have been adequate.
- 230 kV system operability during peak system loads on June 14, 2000.
- Action Requests A0511605, A0512560, A0508282, A0508172, A0510662, Main Annunciator Train Failures.

b. Issues and Findings

There were no findings identified during the inspection.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors observed and evaluated the following postmaintenance test procedures to determine if the test adequately demonstrated that the equipment was capable of performing its safety functions:

- Operating Procedure OP H-1:I, “Auxiliary Building Ventilation System, Make Available and System Operation,” Unit 1, Revision 5A following ventilation work on September 7, 2000.
- STP P-CCP-12, “Routine Surveillance Test of Centrifugal Charging Pump 1-2,” Revision 11, on September 6.
- STP-I-4A, “Analog Channel Operation Test Nuclear Source Range,” Revision 25A, following detector replacement on September 11.
- M0002269 “Trouble Shoot and Repair Panel MPFF 56" (Replaced 100 amp breaker and air compressor motor).

b. Issues and Findings

There were no findings identified during the inspection.

1R22 Surveillance Testing (71111.22)

Routine Observations

a. Inspection Scope

The inspectors observed all or part of the following surveillance and inservice test procedures:

- STP R-3D, “Routine Monthly Flux Map,” Revision 19, on August 22.
- STP M-21C, “Main Turbine Valve Testing,” Revision 31, on August 26.
- STP M-11C, “Terminal Resistance Measurement and Inspection for Vital Station Batteries,” Revision 14, for Battery 1-1 on September 8.

b. Issues and Findings

There were no findings identified during the inspection.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed Temporary Modification/Plant Jumper Log Entry 99-38, “Reactor Coolant Pump 2-2 Motor Vibration Probe VT-46A,” which defeated the indication and alarms for one of the motor vibration probes for Reactor Coolant Pump 2-2. The inspectors reviewed the 10 CFR 50.59 screening, verified that the applicable drawings were annotated, and observed that the necessary tags were in place. This temporary alteration was performed in accordance with Procedure CF4.ID7, “Temporary Modifications - Plant Jumpers and Measuring and Test Equipment,” Revision 7B.

b. Issues and Findings

There were no findings identified during this inspection.

2. RADIATION SAFETY
Cornerstone: Public Radiation Safety

2PS2 Radioactive Material Processing and Transportation (71122.02)

a. Inspection Scope

The inspector interviewed licensee personnel, walked down accessible portions of the radioactive liquid and radioactive solid waste collection, processing, and storage systems/locations. Areas inspected included the auxiliary and low-level waste buildings. The inspector reviewed the following items to determine if the licensee was meeting the

objective of this cornerstone, which is to ensure adequate protection of the public health and safety from exposure to radioactive material released into the public domain from routine operations.

- Radioactive waste/material processing and shipping procedures.
- The status of radioactive waste processing equipment that was not operational and/or abandoned in-place.
- Changes made to the radioactive waste processing systems since the last inspection of this area conducted in August 1999.
- Radioactive waste and material storage and handling practices.
- Processes for transferring radioactive waste resin and sludge to shipping containers and the performance of waste stream mixing and/or sampling.
- Radiochemistry sample analysis results for each of the identified radioactive waste streams.
- Development of scaling factors and calculations used to account for difficult to measure radionuclides.
- Methods and practices used to detect changes in waste stream composition due to changing operational parameters and corresponding radiochemistry analysis results and updates.
- Implementation of waste classification, concentration averaging, waste stream determination, and sample frequency.
- Shipment packaging, surveying, labeling, marking, placarding, vehicle checks, emergency instructions, disposal manifest, shipping papers provided to the driver and licensee verification of shipment readiness.
- Training program for the conduct of radioactive waste processing and radioactive material shipment preparation activities.
- Preparation and shipment of six empty fuel casks on July 27, 2000. Records of 16 nonexcepted shipments of radioactive waste/materials.
- Implementation of applicable shipping requirements including completion of waste manifests.
- Use and implementation of the specifications of the applicable transport cask Certificate of Compliance and cask loading and closure procedures for the approved shipping casks.
- Transferee’s licenses and state/DOT permits.

- Audits and assessments of the radioactive waste handling, processing, storage, and shipping programs.

- Ten radioactive waste/materials shipping program action requests written since the previous inspection conducted in August 1999.

b. Issues and Findings

Waste Classification

In early 1999, the licensee began loading radioactive cartridge filters into a high integrity container for Radioactive Waste Shipment RWS-99-004. The licensee developed a spreadsheet based calculation to ensure that the filters accumulated in the high integrity container for this shipment met the NRC's 1995 Branch Technical Position (BTP) on concentration averaging and encapsulation as criteria for complying with requirements of Chem-Nuclear Systems radioactive waste disposal facility site acceptance criteria. The BTP concentration averaging calculation methodology stipulated that, " . . . all the concentrations of the 'classification controlling' individual radionuclides within all the individual filters be within a factor of 10 of their respective averages for all filters in the mixture."

For this particular shipment, the classification controlling radionuclide was Carbon-14 (C-14). Therefore, the maximum range according to the BTP is 0.1 times the C-14 average specific activity through 10 times the C-14 average specific activity. Seventeen filters were used in the first iteration of the calculation. When the highest and lowest specific activity filters were checked to determine if they were within the factor of 10 range from the calculated average specific activity, one filter (the filter with the lowest specific activity) was outside the range and was removed from the high integrity container filter roster. The classification calculation was repeated for the remaining 16 filters by copying the original spreadsheet and deleting the 17th filter (lowest specific activity filter). However, the spreadsheet cell formula for calculating the C-14 average specific activity was not changed. This resulted in a calculated average specific activity using a divisor of 17 filters instead of the correct number of 16 filters.

A copy of the classification spreadsheet was sent to the Chem-Nuclear Systems radioactive waste disposal facility on August 5, 1999, for review and approval. On August 16, 1999, Chem-Nuclear Systems approved the methodology used by the licensee to classify the cartridge filters in Shipment RWS-99-004. In November 1999, the licensee sent the finalized Class C Waste Classification Record and spreadsheet classification calculation, which contained the mathematical error, to Chem-Nuclear Systems for final approval prior to shipping the radioactive waste in accordance with the requirements of the Chem-Nuclear Systems radioactive waste disposal facility agreement state license. On December 8, 1999, the Chem-Nuclear Systems radioactive waste disposal facility accepted Shipment RWS-99-004 without comment and buried the radioactive waste in a near surface burial area. The above shipment was transported to the Chem-Nuclear Systems radioactive waste disposal facility for disposal as Class C waste in accordance with 10 CFR 61.55, Table 1.

On April 21, 2000, a licensee audit identified a calculation error associated with the waste classification of Shipment RWS-99-004. Seventeen filters were used in the first iteration of the waste classification determination. The average specific activity was recalculated using the correct divisor of 16 filters. Using the correctly calculated average specific activity as the basis for the acceptable range (in accordance with the BTP), two of the low specific activity filters in the 16 cartridge filters in the shipment were outside the acceptable specific activity range of 10. Accordingly, these two filters should not have been included in the BTP averaging calculation. Using the remaining 14 filters that could be averaged, the sum of the fraction was 1.08, compared to the 1.0 limit for Class C radioactive waste shipments. This exceeded the BTP waste classification of Class C waste. However, the licensee was not committed to the BTP. This discrepancy was reported to the Chem-Nuclear Systems radioactive waste disposal site on April 25, 2000.

10 CFR 61.55(a)(8) states, in part, that the concentration of a radionuclide may be averaged over the volume of the waste. The numerical average concentration (specific activity) of the limiting radionuclide, C-14, for the 16 cartridge filters in the shipment was 7.51 micro-curies per cubic centimeter versus the 10 CFR 61.55, Table 1, limit of 8.0 micro-curies per cubic centimeter. Therefore, there was no violation of regulatory requirements as a result of this occurrence (EA-00-209).

The failure to meet Chem-Nuclear System's acceptance criteria was processed through the public radiation safety significance determination process and was determined to be a "green" finding (very low safety significance). This was because the C-14 concentration in the radioactive waste did not exceed the value in 10 CFR 61.55, Table 1, for greater than Class C waste when calculated in accordance with 10 CFR 61.55 (a)(8). This finding is in the licensee's corrective action program as Action Requests A0506728 and A0508956.

4. OTHER ACTIVITIES

4OA1 Licensee Event Report (LER) Reviews

a. Inspection Scope

The inspectors reviewed the following LERs using the significance determination process and accessed and evaluated if the issue was a noncited violation. The following LERs were evaluated as minor issues and not subject to formal enforcement action.

(Closed) LER 323/1999-04: Technical Specification 3.4.2.2 not met due to the pressurizer pressure as found pressure setting low.

(Closed) LER 323/1999-02-00: Reactor fuel damaged due to baffle jetting.

(Closed) LER 275/1999-03-00: Technical Specification 4.3.1.2 time response test not performed.

(Closed) LER 275/1998-06-01: Technical Specification 3.4.2.2 not met due to pressurizer safety valve low loop seal temperature.

4OA5 Management Meetings

Exit Meeting Summary

The inspectors presented the inspection results of the resident inspection to Mr. David Oatley and other members of licensee management at the conclusion of these inspections on October 6, 2000. The licensee acknowledged the findings presented.

The inspectors presented the inspection results of the radiation protection inspection to Mr. David Oatley, and other members of licensee management at an exit meeting on July 28. A supplemental telephonic exit was conducted with Mr. Robert Hite, Director, Radiation Protection, and other members of licensee management on September 20, to present the recharacterized results of the inspection. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT 1

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Becker, Manager, Operations Services
R. Gagne, Radwaste Foreman, Radiation Protection
C. Hansen, Supervising Engineer, Nuclear Quality Services
S. Ketelsen, Supervisor, Regulatory Services
D. Miklush, Manager, Engineering Services
C. Miller, Radwaste Engineer, Radiation Protection
P. Nugent, Acting Director, Regulatory Services
D. Oatley, Vice President and Plant Manager
R. Waltos, Manager, Maintenance Services

ITEMS OPENED AND CLOSED

Opened

None

Previous Items Closed

323/1999-04	LER	Technical Specification 3.4.2.2 not met due to the pressurizer pressure as found pressure setting low (Section 4OA1)
323/1999-02-00	LER	Reactor fuel damaged due to baffle jetting (Section 4OA1)
275/1999-03-00	LER	Technical Specification 4.3.1.2 time response test not performed (Section 4OA1)
275/1998-06-01	LER	Technical Specification 3.4.2.2 not met due to pressurizer safety valve low loop seal temperature (Section 4OA1)

LIST OF ACRONYMS USED

AR	Action Request
ASW	auxiliary saltwater
BTP	Branch Technical Position
CCW	component cooling water
CFR	Code of Federal Regulations
LER	Licensee Event Report
NEI	Nuclear Energy Institute
NCV	Noncited Violation
NQS	Nuclear Quality Services
NRC	Nuclear Regulatory Commission

STP Surveillance Test Procedure
URI Unresolved Item

LIST OF DOCUMENTS REVIEWED

Shipping Documentation Packages: RWS-99-002, RWS-99-003, RWS-99-004, RMS-99-016, RMS-99-055, RMS-99-082, RMS-99-102, RMS-99-106, RMS-99-120, RMS-99-123, RWS-00-003, RMS-00-019, RMS-00-027, RMS-00-028

Action Requests: A0489357, A0489485, A0500672, A0500702, A0502677, A0505174, A0506654, A0508254, A0508255, A0508481, A0508956, A0508692, A0511677 and A0507000

Quality Evaluation Q0012058

NCR Number N0002106
NCR Number N0002096

10 CFR Part 61 Analysis waste stream data packages for 1999

Nuclear Quality Services Audit Report, Audit 003675190, "Solid Low Level Radioactive Waste Management and Radioactive Material Transportation Program," performed April 4 through May 2, 2000

Nuclear Quality Services Solid Radioactive Waste Assessment Report, Assessment Number 003679879, "Cartridge Filters in Waste Liner 99-L-001," performed May 26 through June 2, 2000

Letter, PGE 98-572, dated Oct 8, 1998

Work Orders

C0168910, "AC3A/GEG1-3, Replace Compressor Motor"

Procedures

RP1.DC1	"Radioactive Waste Classification Program," Revision 3
RP2.DC2	"Process Control Program," Revision 5
RCP RW-1	"Collection and Packaging of Low-Level Radioactive Waste," Revision 13
RCP RW-2	"Packaging Radwaste in PIC HICS," Revision 5
RCP RW-4	"Solid Radioactive Waste Shipment," Revision 17
RCP RW-7	"Burial Site Disposal Criteria and Classification of Radwaste," Revision 8
RCP D-631	"Radioactive Material Shipment," Revision 5
STP I-1C	"Modes 1, 2, 3 and 4 "As Required" OPERABILITY Check of Independent Circuits"

STP I-2D; “Nuclear Power Range Incore/Excore Calibration,” Revision 44

OP AP-7 “Degraded Condenser,” Revision 24

ATTACHMENT 2

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety
- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

Radiation Safety
- Occupational
- Public

Safeguards
- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the significance determination process, and assigned colors of GREEN, WHITE, YELLOW, or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, or RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.