

February 18, 2010

SUMMARY OF COMMENTS ON SA-105, *REVIEWING THE COMMON PERFORMANCE INDICATOR, TECHNICAL QUALITY OF INCIDENT AND ALLEGATION ACTIVITIES*

I. Sent to the Agreement States for Comment: October 8, 2009 (FSME-09-092)

Comments/Dated: Organization of Agreement States - 11/9/09 (letter)

Organization of Agreement States

Comment:

The draft revision updates Agency contacts and clarifies other points that could have been misinterpreted. The most significant change is the addition of procedures (V.B.3) to include a review of incidents and allegations that were not reported to NRC. The apparent purpose is to evaluate whether any previously unreported events should have been reported to NRC Headquarters Operations Center. Programs may not keep a specific list of non-reportable events. The proposed procedure does not address what occurrences rise to the level of an "event." Additionally, the review of non-reportable events are not covered by any IMPEP procedure, so any review of such occurrences should be strictly limited to determining whether they were reportable. It should also be made clear in this procedure that the scope of the review does not include an assessment of a state's performance in responding to nonreportable events that are not in IMPEP Procedures.

Response:

We agreed with this comment and revised the procedure to clearly indicate that the reviewer is primarily evaluating the reportability of the events.

II. Sent to the NRC Offices for Comment: October 8, 2009

Comments/Dated: DWMEP - 10/22/09 (e-mail)
OGC - 10/28/09 (e-mail - no comments)
Region III - 10/30/09 (e-mail)
Region IV - 11/3/09 (e-mail - no comments)
DILR - 11/9/09 (e-mail - no comments)
Region I - 11/17/09 (e-mail - no comments)

Division of Waste Management and Environmental Protection (DWMEP)

Comment:

DWMEP's only comment is that on page 3 (at the top) and on page 8 (in VII. References), there are references to STP Procedure SA-300 and STP Procedure SA-400. If appropriate, recommend that you change those references to FSME Procedure SA-300 and FSME Procedure SA-400.

Response:

We agreed with this comment and revised the procedure accordingly.

Region III

Comment:

Section V.E.1.e. requires the principal reviewer to retain certain information about an incident. One of these pieces of information is the location of the incident. Due to sensitivity concerns that piece of information is not included in IMPEP review reports. Since the information is not used, we suggest that it not be required to be collected, as this confuses some reviewers. Since the incident date, license number and NMED number are collected, identification of a specific incident location is not difficult, if that information is later desired.

Response:

We agreed with this comment and revised the procedure, including Appendix A, accordingly.