

October 25, 2000

Mr. Robert J. Barrett
Site Executive Officer
New York Power Authority
Indian Point 3 Nuclear Power Plant
Post Office Box 215
Buchanan, NY 10511

SUBJECT: NRC'S INDIAN POINT 3 INSPECTION REPORT NO. 05000286/2000-006

Dear Mr. Barrett:

On September 30, 2000, the NRC completed an inspection at the Indian Point 3 nuclear power plant. The enclosed report presents the results of that inspection. The results were discussed on October 12, 2000, with you and other members of your staff.

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

The NRC identified one issue involving training description inadequacies for emergency response organization members as part of the Emergency Plan, that was evaluated under the significance determination process and determined to be of very low safety significance (Green). The issue has been entered into your corrective action program, and is discussed in the summary of findings and in the body of the attached inspection report. This issue was determined to involve a violation of NRC requirements. Consistent with the NRC Enforcement Policy, the violation is not cited. If you contest this non-cited violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Indian Point 3 Nuclear Power Plant.

Robert J. Barrett

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Sincerely,

/RA/

James C. Linville, Chief
Projects Branch 6
Division of Reactor Projects

Docket No.05000286
License No. DPR-64

Enclosure: Inspection Report No. 05000286/2000-006

cc w/encl:

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Robert J. Barrett

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REGION I

Docket No. 05000286
License No. DPR-64

Report No. 05000286/2000-006

Licensee: Power Authority of the State of New York,
doing business as The New York Power Authority (NYPA)

Facility: Indian Point 3 Nuclear Power Plant

Location: P.O. Box 215
Buchanan, New York 10511

Dates: August 20 - September 30, 2000

Inspectors: Peter Drysdale, Senior Resident Inspector
Kenneth Jenison, Senior Project Engineer
David Silk, Senior Emergency Preparedness Inspector

Approved by: James Linville, Chief
Projects Branch 6
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000286/2000-006; on 08/20 - 09/30/00; New York Power Authority; Indian Point 3 Nuclear Power Plant. Emergency Action Level and Emergency Plan Changes.

The report covered a six-week period of inspection conducted by resident and regional inspectors per the NRC's revised reactor oversight process (Attachment 1).

Cornerstone: Emergency Preparedness

- Green. The inspector identified that the licensee's emergency plan did not contain any details regarding the training of emergency response organization (ERO) members contrary to the requirements of 10 CFR 50 Appendix IV.F.1. This issue was more than minor because if left uncorrected could result in dilution of ERO training commitments and would affect the emergency planning cornerstone. This issue was considered green in the significance determination process since it did not result in a failure to meet an emergency planning standard. The inspector identified a non-cited violation for emergency plan training description inadequacies (Section 1EP4).

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ATTACHMENT

Attachment 1 - NRC's REVISED REACTOR OVERSIGHT PROCESS

Report Details

SUMMARY OF PLANT STATUS

The Indian Point 3 plant remained at full power throughout the inspection period.

1. REACTOR SAFETY (Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness)

1R04 Equipment Alignment

a. Inspection Scope (71111.04)

During August 17 - 21, 2000, the inspector performed a partial walkdown of the component cooling water (CCW) system using Checkoff List COL-CC-1 "Component Cooling System," System Operating Procedure SOP-CC-1B "Component Cooling System Operation," and system flow diagrams 9321-F-27203 and -27513. During this inspection, the 32 CCW pump was out of service for corrective maintenance on the pump shaft inboard seal. The inspector verified the valve lineup in the common CCW pump discharge header, and verified the system valve positions specified in protective tagout (PTO) 00-1099. The inspector also reviewed deviation/event report (DER) 00-02091, and discussed with the CCW system engineer the corrective maintenance needed to replace a leaking seal on the pump shaft.

On August 31, 2000, the inspector completed a partial walkdown of accessible portions of the 31 and 32 Auxiliary Boiler Feed Pumps (ABFPs) inside the ABFP room to verify equipment alignment and availability during preventive and corrective maintenance on the 33 ABFP. Documents reviewed included: Check Off Lists COL-FW-2, "Auxiliary Feedwater System," and COL-LV-1, "Locked Valve Check Off List;" System Operating Procedure SOP-FW-004 "Auxiliary Feedwater System Operation;" Emergency Operating Procedure ES-1.2, "Post-LOCA Cooldown & Depressurization," and system flow diagrams 9321-F-20183 and 20193.

b. Issues and Findings

There were no findings identified during this inspection.

1R05 Fire Protection

a. Inspection Scope (71111.05Q)

The inspector conducted tours of the plant to verify the availability and material condition of fire protection and suppression equipment in the plant equipment areas. The inspector also examined the programmatic controls for combustible and flammable material, and referred minor concerns regarding potential transient combustibles to the fire protection department, operations management, and "area owners" responsible for housekeeping.

- Main Boiler Feed Pump areas in the turbine building
- All three emergency diesel-generator cells, and fuel oil storage tank piping above ground

- 33-foot cable spreading room and lower cable tunnel

b. Issues and Findings

There were no findings identified during this inspection.

1R07 Heat Sink Performance

a. Inspection Scope (71111.07A)

On September 9, 2000, the inspector reviewed the work package (99-02876-00) used to inspect and clean the 31 instrument air closed cooling heat exchanger (on essential closed cooling header) to verify that potential heat exchanger deficiencies which could mask degraded performance were properly identified. The inspector also evaluated potential common cause heat sink performance problems based upon the heat exchanger's physical condition as documented by photographs in the work package. The heat exchanger's current cleaning frequency was validated based upon the as-found levels of siltation and biofouling prior to cleaning.

b. Issues and Findings

There were no findings identified during this inspection.

1R11 Licensed Operator Regualification Program

a. Inspection Scope (71111.11)

On September 21, 2000, the inspector reviewed a sample of historical training records and observed and evaluated portions of licensed operator regualification training in the plant simulator facility. The observed training consisted of operator proficiency in the use of abnormal and emergency operating procedures (EOPs) in response to simulated off normal conditions, including high reactor coolant system (RCS) leak rates and failed RCS pumps. The historical record review consisted of an evaluation of training exercise content, performance evaluation criteria, areas requiring remediation and crew success rates.

b. Issues and Findings

There were no findings identified during this inspection.

1R12 Maintenance Rule Implementation

a. Inspection Scope (71111.12)

The inspectors reviewed problems involving selected in-scope structures, systems, and components (SSCs) to assess the effectiveness of the maintenance program. The review included a sample of operating logs, system engineer data, system reports, deficiency reports, availability data, selected surveillance performance data and selected maintenance related data. The reviews focused on proper maintenance rule scoping, characterization of failed SSCs, safety significance classifications, 10 CFR 50.65 (a)(1) and (a)(2) classifications, and performance criteria for SSCs classified as (a)(2), or

goals and corrective actions for SSCs classified as (a)(1). The inspectors reviewed NYPA's scoping documents, deficiency/event reports (DERs), and completed work orders. The following SSC deficiencies were reviewed:

- 31 Charging Pump Failure to Start; DER 00-02125
- CCW system and 32 CCW Pump Oil Seal Replacement Rework; DER 00-02091
- Service Water (SW) system, currently in Maintenance Rule status (a)(1)
- Emergency Diesel Generator (EDG) mechanical and cooling water systems

b. Issues and Findings

There were no findings identified during this inspection.

1R13 Maintenance Risk Assessment and Emergent Work

a. Inspection Scope (71111.13)

The inspectors reviewed the maintenance risk assessments and corrective maintenance work packages for the following emergent work, and discussed the deficient conditions with cognizant personnel (system engineers, maintenance technicians, etc.):

- 31 Charging Pump Failure to Start; DER 00-02125

The 31 charging pump failed to start on August 23 during a routine surveillance test (3PT-Q62C) of the 33 charging pump. Several additional attempts to start the 31 pump failed. The 33 pump was returned to service and the 31 pump was maintained in an inoperable status. Two subsequent attempts to start the 31 pump were unsuccessful. The pump was successfully restarted on August 25 after troubleshooting and readjustment of the pump's controller. The licensee completed a revised plant risk assessment on August 25 to account for the inoperable 31 charging pump, but one had not been completed for August 24. The Work Week Manager initiated DER 00-02135 because the 31 pump was removed from service and the Work Control Department was not notified of the change in the operational configuration of the plant. That information was necessary for work control to reassess plant risk for other ongoing plant work. The inspector reviewed DER 00-02135, and discussed with the work week manager the change to the plant's risk profile that resulted from the inoperable 31 charging pump and its affect on other planned maintenance.

- Pressurizer Low Pressure Relay and controller PC-455K Troubleshooting and Test for High Resistance; DER 00-02301

b. Issues and Findings

There were no findings identified during this inspection.

1R14 Personnel Performance During Non-Routine Plant Evolutions and Events

a. Inspection Scope (71111.14)

During the period of September 11 through 21, 2000, the inspector observed operator response to upset conditions related to a reactor flux differential, control room ventilation flow, and effluent radiation monitoring. In addition, through the review of operator logs, deficiency reports, and other plant documentation, the inspector evaluated operator response to a sample of other historical upset conditions.

b. Issues and Findings

There were no findings identified during this inspection.

1R15 Operability Evaluations

a. Inspection Scope (71111.15)

The inspector reviewed various deviation/event reports (DERs) on degraded or non-conforming conditions that raised questions on equipment operability. The inspector reviewed the resulting operability determinations (ODs) for technical adequacy, whether or not continued operability was warranted, and to what extent other existing degraded systems adversely impacted the affected system or compensatory actions. The following DERs, calculations, and operability evaluations were evaluated:

- OD-00-02, 33 EDG Operability with Fan 318 Louvers Full Open; DER 00-00205
- OD-00-05, Operability of EDG Jacket Water and Lube Oil Coolers as a Result of Concrete Lining Pieces Found in the No. 31 EDG Coolers; DER 00-00422
- OD-00-22, Operability of Safety Injection Valve MOV-1810 under 188 psid Assuming Failure of Check Valve SI-847; Calculation IP3-CALC-SI-01081; DER 00-01531
- OD-00-27, Degraded Service Water Pipe Support SWN-A-199-F in the Essential Service Water Discharge Header; Calculation IP3-CALC-SWS-03279, DER 00-02206

The inspector discussed DER 00-2206 and calculation IP3-CALC-SWS-03279 with the licensee. Although the calculation showed the degraded pipe support did not make the pipe/header inoperable, the DER was written several days after initial problem had been identified, and the operability question was consequently delayed. Also, the licensee's extent-of-condition review to identify other potentially degraded pipe supports was initially limited to the service water valve bunker only, but a significantly degraded condensate system pipe support was identified the following week. The licensee subsequently initiated ACTS Item 00-52327 to revise system engineering guidance for identifying degraded pipe supports, and ACTS Item 00-52328 for civil/structural engineering to walk-down two additional valve sets in the plant to investigate for degraded pipe supports. In addition, the licensee initiated a review of administrative procedures AP-8, "Deviation & Event Report Initiation," and AP-8.2, "Deviation & Event Analysis," to develop more specific guidance for identifying appropriate extent-of-condition reviews with a proper scope following the identification of deficiencies.

b. Issues and Findings

There were no findings identified during this inspection.

1R19 Post Maintenance Testing

a. Inspection Scope (71111.19)

The inspectors reviewed post-maintenance test procedures and associated testing activities to assess whether 1) the effect of testing in the plant had been adequately addressed by the control room, 2) testing was adequate for maintenance performed, 3) acceptance criteria were clear and adequately demonstrated operational readiness consistent with design and licensing documents, 4) test instrumentation had current calibrations, range, and accuracy for the application, and 5) test equipment was removed following testing. The following surveillance activities were evaluated:

- 3PT-Q120A, "31 ABFP Surveillance and IST (In service test)," following motor preventive maintenance and greasing of the coupling on August 31, 2000.
- 3PT-M090, "Appendix R Diesel Generator Functional Test," following preventive and corrective maintenance on August 31, 2000.

b. Issues and Findings

There were no findings identified during this inspection.

1R22 Surveillance Testing

a. Inspection Scope (71111.22)

The inspector reviewed surveillance test procedures and associated testing activities to assess whether 1) the test preconditioned the component(s) tested, 2) the effect of testing was adequately addressed in the control room, 3) the acceptance criteria demonstrated operational readiness consistent with design calculations and licensing documents, 4) the test equipment range and accuracy was adequate with proper calibration, 5) the test was performed in the proper sequence, and 6) the test equipment was removed following testing.

The inspector reviewed/observed portions of the following surveillance tests and performed a review of related historical data and surveillance performance.

- 3PT-Q95A,B,C,D, "Pressurizer Pressure Loop P-455, P-456, P-457, P-474 Functional Test," (channels I, II, III); September 11-14, 2000
- 3PT-Q93A,B,C, "Reactor Coolant Flow Functional Test;" September 18-21, 2000
- 3PT-Q62C, "33 Charging Pump Functional Test;" August 23, 2000
- 3PT-Q120C, "33 ABFP Surveillance and IST;" August 31, 2000
- 3PT-M090, "Appendix R Diesel Generator Functional Test," following preventive and corrective maintenance

- 3PT-M01, "Nuclear Power Range Channels Functional Test;" August 23, 2000

3PT-M01 was performed earlier than was normally scheduled since reactor engineering had anticipated possible control room alarms for quadrant power deviation based on data obtained during the most recent core flux map. The nuclear instrumentation (NI) detector currents for full power were normally adjusted two weeks after the last core flux map; however, the most recent flux map indicated that the quadrant flux distribution had changed to the extent that quadrant flux deviation alarms could occur prior to the next readjustment of detector currents. The inspector questioned the excess time interval between core flux maps and NI detector current adjustments, and the licensee changed the normal schedule to reduce the interval to less than a week to avoid control room alarms.

b. Issues and Findings

There were no findings identified during this inspection.

1R23 Temporary Modifications

a. Inspection Scope

The inspector reviewed a sample of 1999 and 2000 temporary modifications (TMs) including TM 00-2855-02 that was installed to support vibration monitoring of the 34 reactor coolant pump. The inspector also evaluated the licensee's administrative requirements and the seismic qualification of the temporary monitoring equipment installed in the control room.

b. Issues and Findings

There were no findings identified during this inspection.

1EP2 Alert and Notification System Testing

a. Inspection Scope

The inspector reviewed licensee commitments regarding the tone alert radio program to ensure that the licensee was maintaining the program by monitoring the need for radios in low siren coverage areas. (Indian Point Unit 2 is responsible for maintaining the sirens around the site whereas Indian Point Unit 3 is responsible for the tone alert program.)

b. Issues and Findings

There were no findings identified during this inspection.

1EP3 Emergency Response Organization (ERO) Augmentation Testing

a. Inspection Scope

The inspector reviewed the licensee's commitments for facility staffing and activation. The qualification records were reviewed to ensure that sufficient numbers of responders were available. The procedure for initiating ERO call-in was reviewed and walked-through. Results from bi-monthly call-in tests were reviewed for timeliness and consistency. Data from the 1996 off hours response drill (when ERO members came to the site) were reviewed.

b. Issues and Findings

There were no findings identified during this inspection.

1EP4 Emergency Action Level (EAL) and Emergency Plan Changes

a. Inspection Scope

The inspector reviewed recent emergency plan and EAL changes to determine if the changes resulted in a decrease of effectiveness of the emergency plan. The licensee's 10 CFR 50.54(q) review process was assessed.

b. Issues and Findings

While reviewing documentation for emergency plan changes, it was determined that the licensee was not in compliance with the requirements of 10 CFR 50 Appendix IV.F.1 which in part states that training of employees shall be described. The licensee's emergency plan did not contain any details regarding the training of emergency response organization (ERO) members. Section 8.2.1, Training, of the licensee's emergency plan referred only to "training department procedures." Due to the absence of training details in the plan and no specific reference in the plan regarding ERO training, this is a violation of 10 CFR 50 Appendix IV.F.1.

This issue was entered into the licensee's corrective action program (part of Action/Commitment Tracking No. 95-10430). This issue was considered to be more than minor because if left uncorrected could result in dilution of ERO training

commitments and would affect the emergency planning cornerstone. This issue was evaluated under the SDP process as a failure to meet a regulatory requirement but not a failure to meet a planning standard. Therefore, the issue was determined to be of very low safety significance (Green) and is a non-cited violation. **(NCV 05000286/2000006-01).**

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector reviewed corrective actions identified by the licensee during quality assurance audits, drill reports, regular self-assessments, and from industry events. Deviation/Event Reports (DER) assigned to the EP department were also reviewed to determine significance of the issues and to determine if repeat problems were occurring. The inspector reviewed the reports for the 1999 and 2000, 10 CFR 50.54(t) reviews to assess that the reviews met the requirements and if any repeat issues were identified.

b. Issues and Findings

There were no findings identified during this inspection.

4. **OTHER ACTIVITIES (OA)**

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspector reviewed the licensee's process for identifying the data that is utilized to determine the values for the three EP performance indicators (PI) which are: 1) Drill and Exercise Performance (DEP) and 2) ERO Drill Participation. (ANS Reliability was not reviewed because the licensee receives this data from Indian Point Unit 2 which was reviewed and documented in Inspection Report 50-247/2000-006.) The review also assessed the 1999 and 2000 data for DEP and training records to verify key ERO member drill participation.

b. Issues and Findings

There were no findings identified during this inspection.

4OA5 Other

.1 External Audit Report Review

a. Inspection Scope

The inspectors reviewed the final report from Indian Point 3's July 1999 evaluation by the Institute of Nuclear Power Operations. This review was performed to identify any safety issues contained in the report.

b. Issues and Findings

There were no findings identified during this inspection.

4OA6 Meetings

Exit Meeting Summary

On October 12, 2000, the inspectors presented the inspection results to Mr. R. Barrett and other NYPA staff members who acknowledged the inspection results presented. The inspector asked NYPA personnel whether any materials evaluated during the inspection were considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

R. Barrett	Site Executive Officer
R. Burroni	I&C Manager
F. Dacimo	Plant Manager
J. Comiotes	General Manager-Operations
J. DeRoy	Director, IP-3 Engineering
R. Deschamps	Health Physics Manager
A. Grosjean	Senior Emergency Preparedness Engineer.
G. Healey	Emergency Preparedness Training
R. Martin	Emergency Preparedness Engineer
D. Mayer	General Manager-Support Services
J. Perrotta	Quality Assurance Manager
K. Peters	Licensing Manager
P. Rubin	Operations Manager
J. Russell	General Manager-Maintenance
A. Vitali	Maintenance Manager
J. Wheeler	Training Manager
M. Wilson	Emergency Preparedness Coordinator

ITEMS OPENED, CLOSED, AND DISCUSSEDOpen/Closed

NCV 05000286/2000006-01 Emergency Preparedness Plan did not contain emergency response organization training in accordance with 10 CFR 50, Appendix IV.F.1.

LIST OF ACRONYMS USED

ABFP	auxiliary boiler feedwater pump
ANS	Alert and Notification System
CCW	component cooling water
COL	checkoff list
DEP	drill and exercise performance
DER	Deviation/Event Report
EAL	emergency action level
EDG	emergency diesel generator
ERO	Emergency Response Organization
EOP	emergency operating procedure
IR	inspection report
IST	in-service test
NCV	Non-cited Violation
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
NYPA	New York Power Authority
OD	operability determination
PAB	primary auxiliary building
PI	performance indicator
psid	pounds per square inch differential
PTO	protective tagout
QA	Quality Assurance
RCS	reactor coolant system
SSCs	structures, systems and components
SWS	service water system
TI	Temporary Instruction
TS	Technical Specifications

ATTACHMENT 1

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	Radiation Safety	Safeguards
<ul style="list-style-type: none">● Initiating Events● Mitigating Systems● Barrier Integrity● Emergency Preparedness	<ul style="list-style-type: none">● Occupational● Public	<ul style="list-style-type: none">● 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, and 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 margins and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margins 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>.