



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 4, 2005

Approve.

*[Signature]*  
Nils J. Diaz OCT-5 AM 11:56 10/13/05

REQUEST REPLY BY: 10/20/05

MEMORANDUM TO: Chairman Diaz  
Commissioner Merrifield  
Commissioner Jaczko  
Commissioner Lyons  
FROM: *[Signature]*  
Luis A. Reyes  
Executive Director for Operations

SUBJECT: SEMIANNUAL REPORT - STATUS OF IMPLEMENTATION OF  
DAVIS-BESSE LESSONS LEARNED TASK FORCE REPORT  
RECOMMENDATIONS

This memorandum forwards the fifth semiannual report on the status of the implementation of the Davis-Besse Lessons Learned Task Force (LLTF) recommendations. The report covers the period from March to September 2005. The implementing plan was developed by the Office of Nuclear Reactor Regulation and the Office of Nuclear Regulatory Research and forwarded to the Commission in a memorandum dated March 10, 2003.

Forty-eight of the 49 LLTF recommendations have been implemented. The one remaining recommendation is being addressed by industry initiatives to revise the American Society of Mechanical Engineers (ASME) code requirements for reactor pressure vessel (RPV) inspection. During this reporting period, the ASME approved code cases for inspection of RPV upper heads and Code Class 1 Alloy 600/82/182 components. The staff supported these efforts and is developing a basis for incorporating them into U.S. Nuclear Regulatory Commission (NRC) regulations. In the interim, the First Revised Order 03-009 continues to provide adequate protection of public health and safety.

The implementing plan includes effectiveness reviews, where appropriate. The effectiveness reviews are conducted about one year after implementing the LLTF recommendation. During this reporting period, the staff performed effectiveness reviews of several completed actions. In general, the reviews indicated that the implementation actions were effective in responding to the LLTF recommendations.

The team chartered by the EDO in January 2005 is creating a program that will institutionalize the agency's most important lessons learned by applying a rigorous, formal process to the

CONTACT: Brendan T. Moroney, NRR/DLPM  
(301) 415-3974

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*Approved with comment*  
*Ellen Jeffrey J.*  
 10/14/05

MEMORANDUM TO: Chairman Diaz  
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*Luis A. Reyes*  
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Commissioner McGaffigan's Comments on COMSECY-05-0047

I approve the staff proposal, but I am concerned about the status of the broader effort, initially assigned to then Deputy Executive Director of Operations, Ellis Merschoff, to develop an NRC corrective action program (see SRM dated December 15, 2004 on the December 8, 2004 Davis-Besse lessons learned Commission briefing). I would recommend the Commission seek a status update on this initiative.

Historically NRC has been criticized (with some merit) that we do not institutionalize our lessons learned and end up having to relearn them at a later date, almost always with bad consequences. With the outflow of experienced staff and the influx of new staff we are expecting in the next five years, it will be critical that these folks be trained not just on our current procedures, but how we got to where we are today and why we instituted changes. As the Chairman often says, NRC is both a learned and a learning institution, and that culture needs to be instilled and embraced going forward.

EMJ 10/14/05



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*Approved, subject to the  
attached comments.*

MEMORANDUM TO: Chairman Diaz  
~~Commissioner Merrifield~~  
~~Commissioner Jaczko~~  
~~Commissioner Lyons~~  
 FROM: *Luis A. Reyes*  
 Luis A. Reyes  
 Executive Director for Operations

*[Signature]*  
10/18/05

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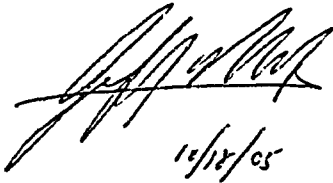
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**Commissioner Merrifield's Comments on COMSECY-05-0047 - Semiannual Report -  
Status of Implementation of Davis-Besse Lessons learned Task Force Recommendations**

I approve the staff recommendation that the fifth semi-annual status report on the implementation of the task force recommendations be the last such report. I commend the staff for the effort put forth to implement all 49 task force recommendations over the last two and a half years. I believe that we truly have learned that neither the regulator nor the licensee can afford to become complacent about nuclear safety. We must continue to view "nuclear safety first" as the lodestar for the agency and the nuclear industry.

I also commend the staff for chartering a team to institutionalize the lessons learned from this event. I join Commissioner McGaffigan in recommending that the staff provide a status update on the team's effort to develop an NRC corrective action program, so that the next generation of regulators does not have to relearn the hard way the lessons taught us by the discovery of the boric acid degradation of the reactor vessel head at Davis-Besse.



12/12/05

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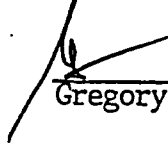
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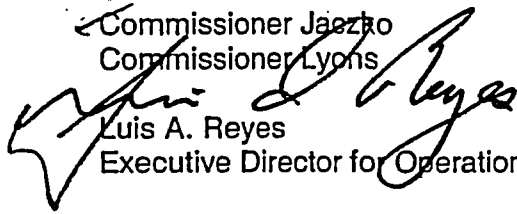
**REQUEST REPLY BY:** 10/20/05

Approved.

MEMORANDUM TO: Chairman Diaz  
 Commissioner Merrifield  
 Commissioner Jaczko  
 Commissioner Lyons

  
 Gregory B. Jaczko

10/11/05  
 Date

FROM:   
 Luis A. Reyes  
 Executive Director for Operations

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MEMORANDUM TO: Chairman Diaz  
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*Catherine Marcote* 10-18-05  
Peter B. Lyons DATE

FROM: *Luis A. Reyes*  
Luis A. Reyes  
Executive Director for Operations

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development and closeout of the associated corrective actions. On the office level, existing processes are being used to address corrective actions.

A summary report of the significant improvements that resulted from the LLTF was posted on the NRC public Web site in June 2005.

The staff anticipates closure of the last LLTF recommendation prior to the Commission briefing on implementation of Davis Besse LLTF recommendations next month. The staff will either brief the Commission on closure of the recommendation at the briefing or notify the Commission upon closure if closed after the briefing. Therefore, the staff recommends that this be the final report on the status of implementation of Davis Besse LLTF report recommendations.

SECY please track.

Attachment: Memo dated 09/29/05 from J. Dyer  
and C. Paperiello to L. Reyes

cc: SECY  
OGC  
DOC  
OCA  
OPA  
CFO



Commissioner Lyons' Comments on COMSECY-05-0047

I commend the staff on its efforts to complete the recommended actions and to ensure that the implemented measures are effective through subsequent effectiveness reviews.

However, the completion of all these actions should not engender any sense of closure in either the staff, the industry, or the Commission. Although I believe that the specific issue of significant boric acid corrosion is now well enough understood, and the industry and NRC staff are sensitized sufficiently, that I do not expect a recurrence of the Davis-Besse head degradation event, I also believe that the focus must now shift to ensuring we improve the agency's ability to capture the most significant insights and lessons that accumulate in the course of our work. When such insights are gained, either through our questioning attitude or through revealed events, actions to address them must be captured and embedded firmly within our regulatory processes with enough history and context that future staff will understand why they are there. I therefore applaud the agency's plan to develop a corrective action/lessons learned program to institutionalize improvements through a rigorous and formal process. I remain very interested in closely following the staff's progress on this fundamentally important initiative, on which we must not lose focus even as our attention is necessarily turned toward the looming challenges of the near future. Toward this end, I support the staff's recommendation that no further reports on the Davis-Besse LLTF actions are required, but I also support directing the staff to continue reporting to the Commission its progress on putting into place the corrective action/lessons learned program and to provide updates on actions taken under this program, on at least an annual basis.

Second, I am encouraged by the progress and innovation of the staff in gathering and disseminating operating experience and support continued refinement of the web-based information sharing tools. I further support continuing the effort to collect operating experience from international sources, with specific consideration given to obtaining the most valuable information related to advanced reactor designs that could be built in the U.S.

Catherine Marco for 10/18/05  
Peter B. Lyons                      Date