

STATUS OF IMPLEMENTATION OF DAVIS-BESSE LESSONS LEARNED TASK FORCE RECOMMENDATIONS

**Office of Nuclear Reactor
Regulation (NRR)
Office of Nuclear Regulatory
Research (RES)**

Agenda

- **Overview** J. Dyer
- **Stress Corrosion Cracking** W. Bateman
- **Operating Experience** T. Reis
- **Inspection Program - Management** S. Richards
- **Barrier Integrity** A. Lee
- **Regional Activities** E. Merschoff
- **Summary** J. Dyer

Overview

Initial Plan Project Controls

- **Action Plans developed for 21 High Priority items**
- **Remaining items integrated into individual Office operational activities via Planning, Budgeting and Performance Management (PBPM) process**

Overview

Enhanced Project Controls

- **Office Executive Level approval of schedule changes and completion**
- **Timely Completion**
- **Effectiveness Reviews**

Overview

Status of Implementation

Priority	Total No.	Completed As Of	
		Feb 04	Dec 04
High	21	7	15
Medium	16	3	15
Low	12	6	10

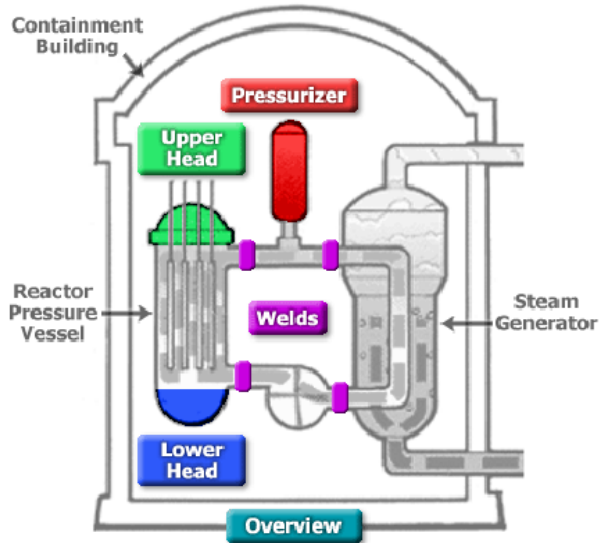
Overview

Status of Implementation

Remaining Items:

- **7 to be completed by May 05**
- **1 may require regulatory actions to implement working group recommendations**
- **1 depends on ASME actions**

Stress Corrosion Cracking



Stress Corrosion Cracking

- **Closed Actions**
 - **Assessment of foreign and domestic Alloy 600 Stress Corrosion Cracking and Boric Acid Corrosion**
 - **Temporary Instructions**
 - **Revised NRC In-service Inspection Activities Procedure**

Stress Corrosion Cracking

- **Remaining Actions**
 - **SRM Direction on SECY 04-0115, Rulemaking Plan For Upper Head Inspections**
 - **Boric Acid Corrosion Inspection Program Review**
 - **Update Project Manager's Handbook**

Stress Corrosion Cracking

- **Increased Sensitivity to Materials Degradation**
 - **Increased Generic Correspondence on Issues**
 - **Enhanced Inspection Guidance**
- **Enhanced Communications**
 - **Stakeholders**
 - **Intra-agency**

Stress Corrosion Cracking

- **Challenges**
 - **American Society of Mechanical Engineers (ASME) Code Activities**
 - **Effectiveness Reviews**
- **Continue to Review Future Inspection Results For Improvements**

Operating Experience

- **Feb 26 Briefing Status– NRR and RES had endorsed recommendations of interoffice task force**
 - **Committed to develop plan by 4/04**
- **Framework to be established by 12/04**
 - **Program will be dynamic and continuous improvements will occur**

Operating Experience

- **Continuing Improvements**
 - **Improved screening structure**
 - **Improved, prompt feedback**
 - **Improvements in web access**
 - **Foreign operating experience**

Operating Experience

- **Plan issued April 29, 2004**
 - **Modular Approach to Developing Framework**
 - **Clearinghouse Module**
 - **Procedures Module**
 - **Information Technology Module**
 - **Effectiveness Module**

Operating Experience

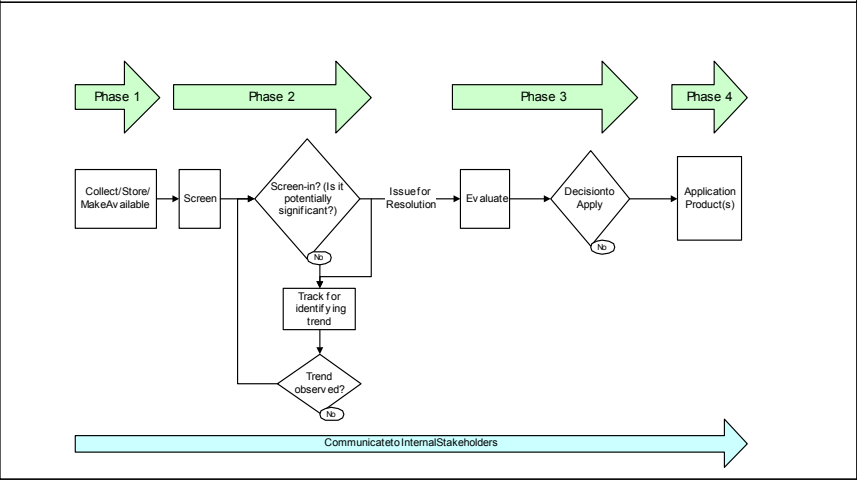
- **Operating Experience Program is designed to meet accepted Objectives and Attributes of NRC Operating Experience Program**

Operating Experience

- **Overarching principle**
 - **Program will support core agency programs and provide for informed decision making and facilitate continuous improvement of core programs**

Program at a Glance

Overview of Clearinghouse Operation – 4 Phases



Operating Experience

- **Implementation Challenges**
 - **Resource intensive**
 - **Effectiveness of Interoffice Coordination.**

Operating Experience

- **Generic Communication Effectiveness**
 - **Sampling Effort**
 - **Program Changes**
- **Continual Efforts in this area**

Inspection Program Management

- **LLTF recommendations:**
 - **Longstanding issues**
 - **Inspector training**
 - **Plant assessment process**
 - **Generic communications and licensee commitments**
 - **Project Manager responsibilities**

Inspection Program Management

- **Recent program revisions:**
 - **Containment walkdowns**
 - **Walkdowns in other restricted areas**
 - **Deferred modifications**
 - **Multiple, repetitive, unplanned Technical Specification actions**

Inspection Program Management

- **Other LLTF recommendations:**
 - **Interim Plant Performance Review process**
 - **annual ROP refresher training**
 - **review of previous lessons learned reports**
 - **Project Manager expectations**

Inspection Program Management

- **LLTF action items under review:**
 - **metric for resident inspection staffing**
 - **review of previously deleted inspections**

Inspection Program Management

- **Challenges:**
 - **Increased inspection of licensee employee concerns programs and safety conscious work environment**
 - **SRM issued August 30, 2004**
 - **cross-cutting issues**
 - **inspector training**

Barrier Integrity

- **Improve requirements**
 - **reactor coolant system leakage**
 - **leakage monitoring systems**
- **Improve NRC inspection procedures**
- **Evaluate adequacy of risk assessment of passive components**

Barrier Integrity

- **2 high priority recommendations completed on schedule.**
 - **Plant technical specifications**
 - **Alarm response procedures**
- **4 remaining high priority recommendations and 1 medium priority recommendation are on schedule.**

Barrier Integrity

Improving coolant leakage requirements

- **Enhanced online detection systems**
- **Improved leakage requirements**
 - **Unidentified vs RCPB leakage**
 - **No power operation with RCPB leakage**

Barrier Integrity

Improving coolant leakage
inspection procedures

- **Action levels to trigger increasing levels of interaction with NRC in response to increasing levels of unidentified RCS leakage. (High)**
 - **Licensees required to trend leak rates**
 - **Inspectors review licensee procedures for action steps**

Barrier Integrity

Improving Coolant Leakage Inspection Procedures

- **Review and improve the usefulness of barrier integrity performance indicators. (High)**
 - **Industry-NRC working group has been formed and is discussing possible alternatives.**

Barrier Integrity Risk Assessment of Passive Component Degradation

- **NRR/RES working group formed in July 2004**
 - **Adequacy of RA model for passive components**
 - **Integration into regulatory decision making process**

Barrier Integrity Challenges

- **RCS leakage rate limit**
- **Barrier Integrity PIs**
- **Risk assessment of passive components**
- **Effectiveness review and implementation**

Barrier Integrity Summary

**All 6 high priority recommendations
are on schedule**

- 2 have been completed.

**1 medium priority recommendation
is on schedule.**

Regional Activities

- **Davis-Besse Lessons Learned reviewed from regional operations perspective**
- **Review Discussed**
 - **Regional Administrators**
 - **Director NRR**
 - **Deputy EDO for Reactor Programs**

Regional Activities

- **Resulted in a Regional Best Practices Benchmarking Process**
 - **Morning Meetings (complete)**
 - **Incident Response (complete)**
 - **Management Roles and Responsibilities (March 2005)**
 - **Inspector Field Observations (June 2005)**
 - **Operating Experience (Oct 2005)**

Summary

- **Significant progress on implementing recommendations**
- **Activities have resulted in significant positive outcomes for the agency and nuclear industry**