

NRC INSPECTION MANUAL

NMSS

INSPECTION PROCEDURE 88002

OPERATIONAL EVENT REVIEW AND FEEDBACK PROGRAMS AT FUEL CYCLE FACILITIES

PROGRAM APPLICABILITY: 2600

88002-01 INSPECTION OBJECTIVE

To determine the effectiveness of the licensee's programs related to chemical and criticality safety for:

01.01 The identification, review, and reporting of operational events described in the facility's license or NRC rules and regulations.

01.02 Providing the plant staff with feedback of pertinent operational experience originating from both within and outside the licensee's organization.

88002-02 INSPECTION REQUIREMENTS

02.01 Verify that the licensee has developed administrative procedures addressing the identification, review and reporting of off-normal operating conditions or events associated with chemical and/or criticality safety to licensee management and to the NRC, if applicable. Assure that the procedures are consistent with the facility license conditions and other NRC guidance.

02.02 Verify that the licensee is properly implementing the administrative procedures.

- a. If lower tier implementing procedures were developed for the facility's various departments or groups, verify that those procedures are consistent with the license conditions and other NRC guidance, and that the specified actions are properly integrated between the departments.
- b. Through personnel interviews, determine that operations personnel and other key individuals (maintenance, health physics, criticality safety, chemistry, etc.) are aware of their responsibility and authority for the reporting of off-normal chemical or criticality safety events to management, and that they have received appropriate training.

- c. Through personnel interviews and record reviews, determine that safety related events have been elevated to the appropriate level of management attention in a timely manner.

02.03 Verify that off-normal chemical and criticality safety events are properly evaluated.

- a. Determine that procedures specify a review chain to determine safety significance of an event or off-normal condition.
- b. Determine that the personnel in the review chain are aware of their responsibilities and authorities as specified in facility procedures.
- c. Determine that the personnel in the review chain are qualified to perform the review.
- d. Determine that (initial) evaluations are completed in a timely manner.

02.04 Verify that the licensee has notified the NRC of any reportable event in a timely manner.

- a. Review records such as reportable and non-reportable event logs for the period of time since the last inspection to identify events of a potentially reportable nature.
- b. For events that the licensee determined were reportable, determine whether the time from initial identification of the condition by an operator or manager till NRC notification was timely. A cross check should be made with Bulletin 91-01 report records obtained from Headquarters FCOB.

02.05 Verify that the licensee has ensured the completion of corrective actions identified for safety-related operating events or conditions.

- a. Determine that the licensee has a tracking system for corrective actions. Review maintenance work requests or change notices to ensure the corrective action work was entered into the licensee's work control system.
- b. Determine that the corrective actions are completed in a timely manner or elevated to senior management for concurrence.
- c. For corrective actions that have not been completed, determine that there is a reasonable bases for continued operation of the affected portion of the licensed activity.
- d. Determine that required facility modifications or controls have been installed as required. Walkdown the modification with knowledgeable licensee operators or engineers.
- e. Determine the adequacy of any compensatory measures that were instituted.
- f. Determine that responsible personnel (shift operators, maintenance and instrumentation mechanics, etc.) are aware of facility modifications, revised controls and compensatory measures, as those items affect the conduct of their duties.

- g. Through a review of the corrective actions list, determine whether appropriate reports were made or if a license amendment was required.

02.06 Verify the existence of a licensee program for addressing operational experience information.

- a. Identify the organizational responsibilities for review of operational experience information and its feedback to the affected facility staff (operations, maintenance, criticality safety, chemical safety, etc.).
- b. Determine that adopted recommendations are properly translated into plant actions (e.g. procedures, lesson plans, or design changes) and have been properly installed or implemented. Any open items should be tracked in accordance with licensee procedures which highlight and elevate schedule slippages to facility management for concurrence or action.
- c. Determine that affected personnel are informed of significant operational experience information in a timely manner, notwithstanding the need for a plant procedure change or emphasis through routine training and retraining programs.
- d. Provide assurance that conflicting or contradictory information is not conveyed to operators and other personnel until resolution is reached.

02.07 Determine the overall effectiveness of the licensee's operational experience feedback process by selecting and following up operational experience reports received by the licensee.

- a. Verify the receipt by the licensee of several known operational experience information reports (Information Notices, Bulletins, Generic Letters, 10 CFR Part 21 notifications, etc.).
- b. Select several operational experience information reports pertinent to the facility and received by the licensee. Determine:
 - 1. the completeness and timeliness of the licensee's review and assessment;
 - 2. the appropriateness, quality, and timeliness of corrective actions taken or planned by the licensee, if corrective actions (including training) were necessary or appropriate; and,
 - 3. verify the completion of corrective actions by reviewing procedures, design changes, equipment installation, etc.

88002-03 INSPECTION GUIDANCE

General Guidance

The inspector should be familiar with the reporting requirements in the facility license, those in 10 CFR Parts 20 and 70, and the guidance in NRC Bulletin 91-01, Supplement 1, and Information Notice 94-73. The intent of Sections 02.01 - 02.05 is to ensure that the licensee has properly captured the applicable reporting requirements in their procedures; that facility personnel are aware of those requirements and are using the procedures; that the program is effective in identifying off-normal conditions; those off-normal conditions are adequately evaluated in a timely manner and reported to the NRC if necessary; and, appropriate corrective action has been taken and completed. The inspector should ensure that the licensee's procedure system has been adequately structured and facility personnel find it "user-friendly". The inspector should cross-check this information by conducting a sample review of events to see how those events were in fact handled by the licensee's system. It is not the intent of this inspection procedure to have the inspector perform an in-depth analysis of a particular event.

Additionally, this inspection procedure reviews how the licensee controls the handling of all types of operational experience information, including NRC bulletins, generic letters, and information notices; reports generated by industry-affiliated organizations; 10 CFR Part 21 and related reports generated by vendors and other licensees; other vendor related reports such as service information letters [SIL's]; reports resulting from employee concern programs or other internally identified problems; and concerns from external persons or organizations.

Where the licensee has determined that certain corrective actions are required, it is important that the inspector conduct a field inspection to assure that the corrective actions were properly installed, appear adequate, and that responsible facility personnel are aware of them.

While reviewing the adequacy of a licensee's operational event review and feedback programs, the inspector must be particularly alert to potentially generic safety issues. Regional management and headquarters FCOB should be immediately notified if information is developed that may indicate the existence of a generic safety issue.

88002-04 RESOURCE ESTIMATE

An inspection performed using this inspection procedure is estimated to require 24 hours of inspector resources. This estimate is only for the direct inspection effort and does not include preparation for and documentation of the inspection.

88002-05 REFERENCES

NRC Bulletin 91-01, Supplement 1, "Reporting Loss of Criticality Safety Controls."

NRC Information Notice 93-60, "Reporting Fuel Cycle and Materials Events to the NRC Operations Center."

NRC Information Notice 94-73, "Clarification of Criticality Reporting Criteria."

10 CFR 40.60 Source Material Reporting Requirements

10 CFR 70.50 Special Nuclear Material Reporting Requirements

10 CFR 70.52 Reports of Accidental Criticality or Loss or Theft of SNM

10 CFR 70.59 Effluent Monitoring

10 CFR 21.21 Defects and Noncompliance

10 CFR 20.402 Reports of Theft or Loss of Licensed Material

10 CFR 20.403 Notifications of Incidents

10 CFR 20.405 Reports of Overexposures

END