



Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions

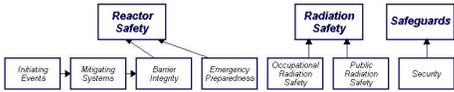
**NRC RIC Session TH31:
Forget Waldo,
Where's Goldilocks**

David Lochbaum
Director, Nuclear Safety Project
Union of Concerned Scientists
March 15, 2012

Current NRC & Industry Issues

- Reintegration of security stuff in ROP
- Public Radiation cornerstone

Reintegration of security stuff in ROP



Most Significant Inspection Findings

Quarter	Reactor Safety	Mitigating Systems	Barrier Integrity	Emergency Preparedness	Occupational Radiation Safety	Public Radiation Safety	Security
4Q/2011	Y (1)	W (1)	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter
3Q/2011	G	G	No findings this quarter	G	G	No findings this quarter	No findings this quarter
2Q/2011	G	G	No findings this quarter	No findings this quarter	No findings this quarter	G	No findings this quarter
1Q/2011	G	G	G	No findings this quarter	No findings this quarter	G	No findings this quarter

PUT US BACK!

NRC says that security findings are corrected immediately or compensatory measures put in place – if true, then there's no justification for withholding security info from ROP.

Public Radiation cornerstone

Public Relations 01, oops – Public Radiation 01.
Also known as ALL GREEN ALL THE TIME.

Plants	IE 01	IE 03	IE 04	IE 05	MS 06	MS 07	MS 08	MS 09	MS 10	BI 01	BI 02	EP 01	EP 02	EP 03	OR 01	PR 01
Arkansas Nuclear 1	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Arkansas Nuclear 2	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Beaver Valley 1	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Beaver Valley 2	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Bradwood 1	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Bradwood 2	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Browns Ferry 1	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Browns Ferry 2	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Browns Ferry 3	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Brunswick 1	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Brunswick 2	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G

Public Radiation cornerstone

	Performance Indicators				Inspection Findings			
	Green	White	Yellow	Red	Green	White	Yellow	Red
2001	1,834	8	0	0	660	23	2	0
2002	1,835	5	0	0	783	30	1	2
2003	1,825	15	0	0	748	19	2	4
2004	1,834	6	0	0	778	11	0	0
2005	1,850	4	0	0	849	10	1	0
2006	1,843	11	0	0	676	13	0	0
2007	1,942	8	1	0	759	9	2	0
2008	1,762	6	0	0	776	17	0	0
2009	7,039	18	0	0	879	7	0	0
2010	7,009	23	0	0	816	9	2	0
Sum	28,773	104	1	0	7,724	148	10	6
Percent	99.6%	0.4%	0.0%	0.0%	97.9%	1.9%	0.1%	0.1%

Why waste resources searching for yet another totally useless performance indicator to replace one or supplement all the existing totally useless performance indicators?

Current Public Issues

Input from Public Colleagues

I solicited input from citizens and public interest groups around the country about the reactor oversight process.

Responses, in order they were received:

Input from Public Colleagues: DC

- ROP is not designed to regulate plant owners; instead it regulates the NRC, tying inspectors hands and “green”washing their few findings

Input from Public Colleagues: PA

- “Not a big fan of the ROP, and preferred the SALP”
- Doesn’t understand why law enforcement operates a “zero tolerance” concept protocol, and the NRC operates a “tolerance for rule breaking” protocol

Input from Public Colleagues: OH

- The NRC should use its FOR THE RECORD web feature to respond to incorrect / inaccurate / incomplete statements by plant owners
- Recognize that NRC lacks statutory authority to sanction licensees for false statements, but NRC should set the record straight, sending a message to owners that their misleading statements are inappropriate

Input from Public Colleagues: IL

- NRC tolerated years of tritium leaks at Braidwood with no sanctions
- Company drilled monitoring well through this citizen's driveway
- Citizen asked NRC resident inspector what he'd do if she dumped oil on his lawn – "I'd have you arrested."
- Why does NRC let companies dump on them when it wouldn't accept same in return?



UCS's 

 **IP 71152 is the most useless arrow in the NRC's inspection quiver.**

IP 71152 must become the most valuable arrow in that quiver.

If only one part of the ROP is fixed, fix IP 71152.

NRC INSPECTION MANUAL IRIB
INSPECTION PROCEDURE 71152

PROBLEM IDENTIFICATION AND RESOLUTION

PROGRAM APPLICABILITY: 2515

CORNERSTONES: ALL

EFFECTIVE DATE: Janu

INSPECTION BASIS: A fur

● ALL of the reactors that wandered into the Degraded Cornerstone and Multiple/Repetitive Degraded Cornerstone Columns of the Action Matrix were aided by inadequate corrective action programs.

● After 10 years of ROP'ing, UCS finds no evidence that IP 71152 ever found anything (other than a splendid way to waste time).

Commissions (NRC's) reactor oversight process (ROP) is to establish confidence that each licensee is effectively detecting, correcting, and preventing problems which could impact cornerstone objectives. A key premise of licensees' problem (I&R) programs will be issues which will be inspection program or passing predetermined thresholds. However, several aspects of PI&R are not specifically addressed by either the individual cornerstone performance indicators or other baseline inspections. These aspects are described in Section 71152-01 of this inspection procedure (IP).

UCS's 

 **IP 71111.21 is a very useful arrow in the NRC's inspection quiver.**

IP 71111.21 must be made much more valuable.

After IP 71152 is fixed, IP 71111.21 should be upgraded.

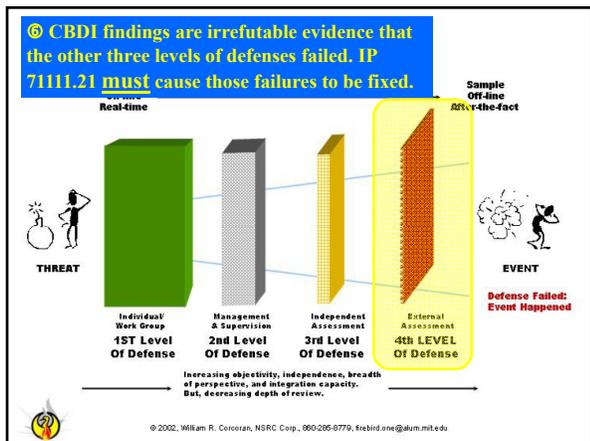
ATTACHMENT 71111.21

INSPECTABLE AREA: Component Design Bases Inspection

INSPECTION BASES: **● CDBIs are limited-scope audits. As such, they only provide insights into the adequacy of licensee's configuration management programs. Consequently, it's simply not enough to have licensees correct the broken widgets identified during the CDBIs.**

● CDBIs must trigger the determination of why the licensees failed to identify the broken widgets before the NRC did.

LEVEL OF EFFORT: Review 15-25 risk significant samples in the following categories: components and operating experience.



So what?

NRC SITs and AIT in 2011

Braidwood	Monticello	Perry
Byron	North Anna	Pilgrim
Callaway	Oconee	Pilgrim
Cooper	Palisades	Turkey Point 3
Millstone 2	Palisades	Wolf Creek

Over half of the 2011 SITs/AIT had causal factors clearly within the CDBI scope. More effective CDBIs will very likely reduce the number of future SITs/AITs.

Summary

Security stuff must be restored with ROP reporting frameworks

The ROP has exceeded its quota for totally useless performance indicators; a revised or new totally useless Public Radiation performance indicator ain't necessary

Summary

Public feels ROP needs less and more



UCS feels that IP 71152 is simply useless and must be significantly upgraded

UCS also feels that IP 71111.21 is not as useful as it needs to be and should be upgraded

