



COVID-19 Remote Inspection Guidance

RAMP User Group Meeting
October 26, 2020

Inspection Guidance

- Three memoranda issued to the regions to specify Reactor Oversight Process (ROP) implementation expectations
 - Two of the memos are still in effect: April 6, 2020 (ML20097E538) and May 28, 2020 (ML20141L766)
 - Initial guidance was resident inspectors on site about every 3 days (and no team inspections). Site presence was expanded by the May 28 memo
 - Residents keep close communication with plant management and staff on plant conditions while on telework
 - ROP implementation during PHE must be flexible based on specific COVID-19 conditions in and around plant site and state/local restrictions
 - Emphasis placed on inspector health and safety
- Goal is to complete minimum inspections samples for the 2020 inspection cycle

Inspection Guidance

- Key lesson learned is that remote inspection can be executed effectively
- Adapting to remote inspection was initially challenging
- Remote availability of licensee plant information has proven to be very beneficial – NRC to explore enhanced remote capabilities for the future
- Some inspection procedures are more amenable than others for remote inspection
- Effective remote communications with plant staff and management is essential
- Certain team inspections had to be rescheduled
- Variable COVID-19 conditions in and around plant sites and different state/local government restrictions have been a challenge
- Information for team inspectors became more difficult not being on site
 - Time delay between info request and licensee posting to Certrec
 - No remote access to licensee plant information

Resident Inspector Remote Access

- Survey sent to all Senior Resident Inspectors to determine the current ability to remotely access plant information.
- Results revealed that all 59 resident inspector offices were able to remotely access licensee plant information and programs using various mechanisms (i.e., NRC/licensee/personal IT equipment).
- Remote access available to important plant information such as condition reports, operator logs, Tech Specs, FSAR, daily plant status information and work control information.
- Resident offices use various remote communication tools (e.g., Skype, Zoom, WebEx, Teams) to keep track of plant activities and discuss plant issues.
- Some resident offices have remote video camera capability to site cameras to varying degrees.

Conclusion – Remote access to plant information and licensee programs is essential for continued NRC oversight during public health emergencies.

Inspection Guidance

Baseline Inspection Telework Completion Capability

This list draws a distinct line between inspections that are capable of being completed entirely remotely and still meet the minimum sample requirements and those that require some onsite verification. For procedures able to be completed remotely, inspectors will have to exercise discretion to ensure the sample selected is of a type that can be completed remotely and still meet all requirements. For procedures that must be completed onsite, inspectors are encouraged to complete as many requirements as possible remotely and limit onsite inspection to only that required to complete the sample.

Procedure	IPE Code	Title	Frequency	Remote	Onsite	Note
71111.01	BI	Adverse Weather Protection	Annually			
71111.01 Seasonal		Seasonal Extreme Weather Sample (IP Section 03.01)		X		Inspectors should exercise discretion on whether walkdowns are necessary given the specifics of the sample and the site.
71111.01 Impending		Impending Severe Weather Sample (IP Section 03.02)			X	
71111.01 Ext Fld		External Flooding Sample (IP Section 03.03)			X	
71111.04	BI	Equipment Alignment	Annually			
71111.04 Partial		Partial Walkdown Sample (IP Section 03.01)			X	
71111.04 Complete		Complete Walkdown Sample (IP Section 03.02)			X	
71111.05	BI	Fire Protection	Annually			
71111.05 Walkdown		Fire Area Walkdown and Inspection Sample (IP Section 03.01)			X	
71111.05 Drill		Fire Brigade Drill Performance Sample (IP Section 03.02)			X	
71111.06	BI	Flood Protection Measures	Annually			
71111.06 Int Fld		Inspection Activities - Internal Flooding			X	Sections 02.01 and 02.03 can be performed remotely but 02.02 must be onsite.
71111.06 Cable Degrade		Cable Degradation			X	Sections 02.01 and 02.03 can be performed remotely but 02.02 must be onsite.
71111.07A	BI	Heat Sink Performance	Annually			
71111.07A		Annual Review (IP Section 03.01)		X		Inspectors should exercise discretion on whether walkdowns are necessary based on the nature of the sample selected.
71111.07T	BI	Heat Sink Performance	Triennial			

Inspection Guidance

From 5/28/20 NRR Director Memo: **Notes on Potential Problem Areas in completing the CY2020 ROP:**

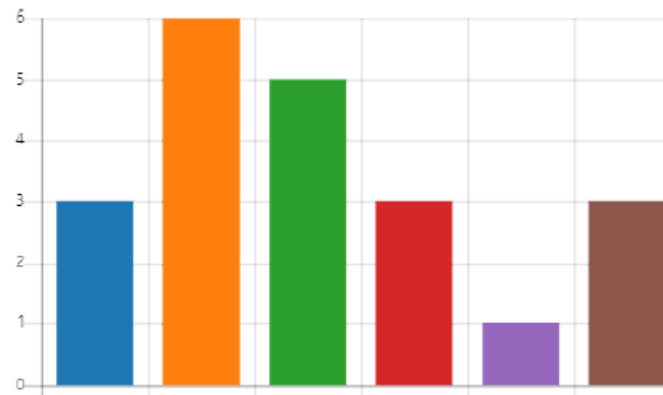
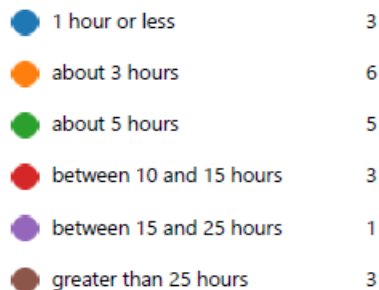
1. IP 71111.20, “REFUELING AND OTHER OUTAGE ACTIVITIES” has 18 high level requirements to complete the IP. Some high-level requirements are very specific (i.e. “If containment is opened, conduct a walkdown of containment just before closure”). IMC 2515 states that “the inspector is to perform the inspection requirements most appropriate ... to the activity being inspected in order to declare an activity (sample) as being satisfactorily completed.” Inspectors that do not complete a high-level requirement when it is available to be completed will need to document the IP as partially completed. For IP 71111.20, there is no means to go back and complete the missed requirement.
2. IP 71111.11B, “LICENSED OPERATOR REQUALIFICATION PROGRAM” is performed by the DRS operating license examiners. Sites perform simulator requalification examinations every year, and the requalification inspection is performed on a two-year cycle. Regional inspections of simulator exams at some sites are currently in their second year and DRS inspectors may not be able to travel to the site to inspect this portion of 71111.11B (i.e. “Observe the administration of simulator scenarios and JPMs during the conduct of an annual requalification operating test required by 10 CFR 55.59(a)(2).”). Sites usually perform these over a six-week period to hit every operating crew. Regions may not be able to inspect this part of 71111.11B at some sites. This would also make this IP partially complete with no means to go back and complete it during the 2-year inspection cycle.
3. IP71124.01, “RADIOLOGICAL HAZARD ASSESSMENT AND EXPOSURE CONTROLS,” is performed by regional inspectors annually. The IP states: “Inspections should be performed during a refueling outage (RFO) or when radiologically significant work is being performed. When appropriately risk-informed samples are not available for inspection follow completion guidance of IMC 0306 section 06.08.f.3” (Note: Not highlighted in the procedure). The problem is for sites that have completed refueling outages this year and this sample was not completed on site. DRA is evaluating if the IP can be completed when the regional RP inspectors eventually go back on site this year (even though the RFO has been completed).

SRI/RI on Site Assistance for Team Inspections

Have you assisted a regional remote team inspection in performing an action that could only be performed onsite (e.g. equipment walkdown, POV inspection, gathering documents, etc.) from 3/15/2020 to present?



If you answered yes to #1, how much cumulative time have you spent assisting remote team inspections with onsite items from 3/15/2020 to present?



SRI/RI on Site Assistance for Team Inspections

What team inspection did you assist on?

711152B (PI&R)	9
71111.21M (DBAI-Teams)	3
71111.21N.02 (POV)	2
71111.21.05 (Fire Triennial)	0
71111.17T (50.59)	0
71111.07T (Heat Sink)	1
71111.08 (ISI)	4
Any Radiation Safety Inspectio...	5
Any Security Inspection (71130)	3
Any EP Inspection (71114)	0

