

MEMORANDUM TO: Hubert J. Miller, Regional Administrator, Region I
Luis A. Reyes, Regional Administrator, Region II
James E. Dyer, Regional Administrator, Region III
Ellis W. Merschoff, Regional Administrator, Region IV

FROM: Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

SUBJECT FEEDBACK ON PILOT PROGRAM

In November 1999, I sent out surveys soliciting feedback from you and your staff who participated in the pilot program on the revised reactor oversight process. In December 1999, you provided me feedback on how the new process relates to the agency's four performance goals and the survey results from your staff. In addition, 8 NRR staff members submitted responses to the survey. The purpose of this memorandum is to summarize the results of this survey and to describe how we intend to address the key issues and concerns. The survey evaluation discussed below focused on regional comments as the regional staff are the primary implementers of the new process and NRR staff comments were generally consistent with regional staff comments.

My staff has completed a formal evaluation of the survey responses. Attachment 1 provides the result of the detailed evaluation of feedback on the pilot program including how we intend to address key issues and concerns. Attachment 2 provides a compilation of survey results.

Overall, you viewed the new process positively, but identified several areas that needed additional work. You noted that the new process improves objectivity and consistency of our oversight activities, and that the pilot program provided a sound basis for proceeding to initial implementation of the program. However, you recommended additional work in several areas, including inspection documentation, the focus and extent of inspection of crosscutting issues, and the significant determination process (SDP). No issues were identified that necessitate delaying the planned implementation date at all plants.

Survey respondents expressed a generally positive view of the new process but had concerns related to several elements of the process. Respondents scored seven of the eight areas in the survey positively overall, with the SDP being the only area rated negatively (driven primarily by the staff view that it was not easy to use). Respondents viewed the new process as being more objective, predictable, and efficient, but expressed concern that it would not identify declining performance before significant reductions in safety margins. Respondents also expressed concerns that the revised inspection report format would not result in all relevant information being communicated to the licensee and the public, or that the inspection procedure resource estimates were inaccurate in many instances. Staff concerns about the ability of the new process to identify declining performance and inspection reports to adequately communicate results accentuate the need to closely monitor initial implementation of the program.

Written comments were generally more critical than other feedback and focused primarily on various action thresholds associated with PIs and the SDP. The overarching message from the written comments from region-based inspectors was that it was too early to judge the effectiveness of various new elements in the oversight process. This highlights the need for continued management oversight and monitoring of the execution of oversight process elements during initial implementation. Written comments provided useful information to clarify survey responses and were provided to program area leads for consideration and resolution. This feedback has enhanced our ability to continue reforming the new oversight process and the effort provided by your staff in participating in the survey is greatly appreciated.

My staff has initiated a number of actions in response to feedback from the survey. Issues raised by survey respondents were compared to issues identified at the internal and external lessons-learned workshops. It was found that many of our ongoing or planned activities would address many of the issues raised by survey respondents. Where appropriate, additional efforts have been identified to address key concerns that were not appropriately addressed. In addition to this memorandum, we have included an evaluation of the internal survey in the Commission paper describing the "Results of the Revised Reactor Oversight Process Pilot Program."

I believe the results of the survey, as well as your own personal feedback has provided us with excellent insights for enhancing the oversight process. The results also reflect where we are relative to implementing the changes required by the revised reactor oversight process. While it is clear the new process has resulted in a marked improvement in its objectivity, risk-informed content, clarity and predictability, further experience on a broader scale is needed to engender greater confidence in its efficacy. The continued change management that will be required as we proceed into initial implementation will provide a notable challenge to all of us. I encourage all of you to continue your efforts to manage the change process in the manner with which you implemented the pilot program.

Please share this memorandum, and its attachments with your staff.

Attachments: As stated

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cc:

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R. Blough, R I	G. Grant R III	W. Beecher, OPA	B. Mallett, R II
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EVALUATION OF FEEDBACK ON THE PILOT PROGRAM

Introduction

In November 1999, NRR sent out surveys soliciting feedback from regional administrators and staff pilot program participants on the results and efficacy of the revised oversight process. All four regional administrators provided their personal insights regarding the revised reactor oversight process as it pertains to the agency's performance goals. Ninety-four staff members responded to the survey (31 from RI, 18 from RII, 26 from RIII, 19 from RIV) and provided extensive written comments.

Survey Purpose and Scope

The purpose of the survey was to solicit feedback from internal stakeholders who have been directly involved with the revised reactor oversight process pilot project. Although participants were able to provide feedback on various aspects of the process during the pilot, the survey gave them an opportunity to provide a more integrated view after having experienced the entire pilot program.

The survey requested respondents to indicate the degree with which they agreed or disagreed with the effectiveness of 35 attributes of the new oversight process. The survey divided the attributes into eight areas: overall process, inspection program, performance indicators, effectiveness and efficiency, assessment and enforcement, stakeholder confidence, significance determination process, and training.

Results and Analysis

Regional Administrator

Regional administrators expressed varying views regarding the effectiveness of the revised reactor oversight process but were generally positive with respect to the process effectiveness and ability to achieve the agency's four performance goals. One regional administrator described the process as a significant improvement and a needed change. Another described the process as greatly strengthening our focus on risk and as establishing a clear and more objective regulatory framework. Another described the process as providing a more objective process for evaluating inspection findings that would result in improved consistency across the regions. One regional administrator believed it was too early to determine the impact the process will have on the safety performance of licensees and on public safety. There was a consensus that the new process (coupled with the revised enforcement policy) reduced unnecessary regulatory burden on licensees and increased the efficiency of NRC processes.

Two regional administrators specifically indicated that the pilot program provided a sound basis for proceeding to initial implementation of the program at all sites. No issues were identified that would necessitate a delay in the planned implementation date. However, most

Attachment 1

regional administrators identified a number of concerns or areas they recommended for close attention. At least two regional administrators commented on each of the following issues:

- Inspection Documentation

One regional administrator expressed the concern that inspection reports and plant issue matrixes (PIMs) have become too streamlined and may not provide the most effective information for the plant performance review (PPR) process assessment of crosscutting issues. Another commented that it is important to identify patterns of individual items, which alone do not rise to the very high level of risk associated with the significance determination process (SDP), but which collectively reveal important weaknesses in a licensee's program. This regional administrator indicated that documenting such patterns in inspection reports and, perhaps, making PIM items when important corrective action program weaknesses are identified will contribute to both the maintenance of safety and public credibility goals.

- Crosscutting Issues

One regional administrator was concerned that the new process does not provide the appropriate focus and attention to crosscutting issues; in particular, he believed that the resources applied to complete the annual problem identification and resolution (PI&R) inspection should be at least doubled. Another believed that the new program should include a reasonable assurance determination that licensees have acceptable programs in place for dealing with crosscutting issues. He suggested adding additional crosscutting issues such as design control and performance indicator verification. He also suggested a review of the inspection strategy for dealing with components that can degrade more than one cornerstone (due to common-mode failures of multiple systems), such as motor-operated valves, air-operated valves, circuit breakers, and so on.

- Significance Determination Process

One regional administrator stated that it was difficult to assess the SDP because limited experience was gained with it during the pilot program. Another stated that while the SDP focuses on the change in core damage frequency over a year (delta CDF), this risk metric may not give sufficient recognition of unacceptable risk that exists for a short period. He suggested that short-term problems would be better assessed using changes in conditional core damage probability (CCDP). This regional administrator also stated that overall risk determination is dominated by initiating event frequency over mitigation capabilities and suggested that we should consider partitioned assessment criteria between mitigation and initiating events to ensure an adequate defense-in-depth approach is maintained.

- Inspection Planning and Preparation

One regional administrator indicated that extensive planning and preparation is required to effectively implement the inspection procedures and that determining the amount of inspection needed to provide adequate indication of licensee performance is a critical element. He noted that making final judgments on inspection scope will require a great deal more experience and extensive management involvement to ensure sound judgments are made. Additionally, two regional administrators stated that initial estimates of resources needed to perform inspection procedures were substantially too low in a number of areas. Three regional administrators indicated that variations in inspection due to non-performance issues, such as inspector skill and efficiency, complexity of issues selected for inspection, licensees' inspection support,

degree of similarity in plant design (at multiunit sites), and the availability of design and licensing information will complicate the establishment of inspection scope and resource requirements.

Survey Results

The survey results were tabulated in a three-step process: (1) the responses to a question/opinion area (referred to as an attribute) were listed (e.g., 2 employees chose “strongly agree”, 12 employees chose “agree”, 13 chose “neither agree nor disagree”, etc.); (2) a statistical result was calculated by assigning +2 points for “strongly agree”, +1 point for “agree”, 0 points for “neither agree nor disagree”, -1 point for “disagree”, and -2 points for “strongly disagree” (with the “not familiar enough to answer” responses tossed out); the points were then added and the sum divided by the number of responses to compute a numerical average response; and (3) the statistical results for all of the attributes in that area were averaged to arrive at a statistical result for the area. This approach was chosen as it objectively addresses both the specific response and the number of responses for each attribute. Survey results are given in Attachment 2.

The statistical result for individual attributes ranged from - 0.38 (disagreement) to 0.78 (agreement), while area scores ranged from -0.15 to 0.59. Of the eight program areas in the survey, respondents viewed all areas positively, with the exception of the SDP, which was slightly negative.

Within those areas viewed positively, respondents disagreed with several significant attributes. These included (1) “the new process allows for identification of declining safety performance before significant reductions in safety margins” (2) “for those areas covered by performance indicators, they are capable of providing an adequate indication of declining safety performance”; and (3) “the new inspection report format adequately communicates relevant information to the licensee and the public.” The overarching message from written comments was that it is too early to judge the effectiveness of various new elements in the oversight process, which is a conclusion consistent with the large number of respondents that neither agreed nor disagreed with specific survey questions or that responded that they were not familiar enough to answer.

Survey results follow, organized by area and ordered by the extent respondents agreed with attributes within the area.

- Training

The training area received the highest positive score (+0.59), with each attribute within the area ranked positively. This area had each attribute ranked positively. Respondents agreed that training adequately explained why the process was changed and the roles of performance indicators (PIs) and inspections.

- Assessment and Enforcement

The assessment and enforcement area received a positive score (+0.42), with each attribute within the area ranked positively. The most positively scored attribute in the survey was the concept that using non-cited violations and reliance on the licensee's corrective action program provide for an adequate approach to resolve issues of low safety significance (+0.78). This score would indicate broad support for the approach of focusing less NRC attention on issues of very low safety significance. It is noteworthy that 26 respondents indicated that they were not familiar enough to answer whether the enforcement actions specified in the Action Matrix were adequate, presumably due to the few violations issued during the pilot.

- Effectiveness and Efficiency

The effectiveness and efficiency area received a positive score (+0.33), with each attribute within the area ranked positively. Respondents agreed that the new oversight process improves the efficiency and effectiveness of the regulatory process, focusing agency resources on those issues with the most safety significance, and that the new process was more efficient and effective than the old process.

- Overall Process

Respondents ranked the overall process area positively (+0.29). Participants agreed that the new program provides objectivity to the oversight process and that the overall effort (inspection, enforcement, assessment) was more efficient than the old process. However, participants disagreed that the new process allows for identification of declining safety performance before significant reductions in safety margins (the most negatively scored attribute (-0.38)).

- Performance Indicator

Respondents ranked the PI area positively (+0.29). Participants agreed that PIs provide information in areas that are risk significant and that the PIs are understandable. However, participants disagreed that PIs are capable of providing an adequate indication of declining safety performance. Written comments stated that a couple of PIs provided limited safety performance information (containment leakage and reactor coolant system activity), that some thresholds are too high, and that some PIs need a clearer definition.

- Stakeholder Confidence

Respondents ranked the stakeholder confidence area positively (+0.24). Respondents believed the new oversight process increases the predictability, consistency, clarity, and objectivity of the NRC oversight process. Respondents disagreed slightly that the information provided by the NRC is appropriate for keeping the public informed of agency oversight activities related to the plants. Written comments indicated that respondents believed that the inspection report threshold should be lower to allow the documentation of lower level performance insights and to help identify and evaluate performance trends.

- Inspection Program

Respondents ranked the inspection program area positively (+0.15). Respondents believed that the baseline inspection program will appropriately identify risk-significant issues and that the scope of the baseline inspection procedures is adequate to address intended cornerstone attributes. However, there was disagreement that the new inspection report format adequately communicates relevant information to the licensee and the public, and that the level of effort required for conducting each inspection was consistent with that indicated in the inspection procedure. This is related to the substance of many of the written comments noted above in the stakeholder confidence area. Forty-three respondents answered that they were not familiar enough with the adequacy of supplemental inspection procedures to evaluate the licensee's root cause and corrective action effort, which is consistent with the limited use these procedures received during the pilot program.

- **Significance Determination Process**

Respondents ranked the SDP area negatively (-0.15). This negative rating was primarily due to disagreement by respondents with the statement that the SDP process is easy to use. Written comments indicated that while respondents did not fundamentally disagree with the approach, respondents believed SDP thresholds were too high and took issue with various limitations of the SDP. Limitations included complexity, extensive time to use, and the fact that neither the containment SDP or the shutdown SDP screening tool was available during the pilot program.

Analysis of Major Issues and Recurring Themes

Regional administrators and survey respondents had similar concerns related to the SDP, inspection report documentation thresholds, and the estimated resources needed to accomplish various inspections (specifically, crosscutting issues). A few aspects of the revised reactor oversight process were infrequently exercised (enforcement actions, supplemental inspections, and the more significant columns of the Action Matrix) during the pilot program, thus contributing to the large number of respondents who answered that they were not familiar enough with the process to answer some survey questions.

Survey respondents were most concerned about a fundamental objective of the new process: its "ability to identify declining safety performance before significant reductions in safety margins." This fundamental objective is both critical to the success of the new process and an element of the process with which inspectors have had minimal experience. Inspectors are trained to be skeptical and to evaluate results before reaching conclusions. This skepticism is evident in the number (28) of respondents who neither agreed nor disagreed that the new process successfully accomplished this fundamental objective and the relatively large number of respondents who disagreed (32) or strongly disagreed (10) with the ability of the new process to accomplish this fundamental objective. Inspector skepticism is also reflected in the most frequently written comment from respondents that it was too early to claim success for new approaches in the revised reactor oversight process. Inspector skepticism may be based, in part, on recognition of the difficulty that even the existing oversight process experienced in consistently identifying declining performance (where inspectors had greater flexibility to select inspection scope and the extent of documentation). In addition, inspector skepticism may be based on concerns that some action thresholds are not perceived to be established at proper levels. While the revised regulatory framework and related processes clearly focus

staff and licensee attention on issues of high significance, this feedback reflects the staff's comfort with the old process and that a period of time will be needed to provide an elevated level of confidence in the new process. This area warrants close attention as the success of the revised reactor oversight process is dependent on its ability to accomplish this fundamental objective.

Two regional administrators and a number of survey respondents expressed concern that inspection reports may be too streamlined or may limit information associated with performance issues. The adequacy of the new inspection report format to adequately communicate relevant information to the licensee and the public and to support the assessment of licensee performance is an area that needs to be monitored. The staff has expanded the guidance on inspection reports to allow for substantive issues associated with cross-cutting issues to be included. This requires inspector to put such issues into an appropriate safety context.

Survey respondents believed that the SDP was not easy to use. The development and implementation of the SDP has been one of the major challenges for the new reactor oversight program. The objective of achieving consistent, scrutable, and predicable significance characterization results for all inspection findings is fundamental to the new oversight process. However, for the plant-specific reactor safety SDP, the use of risk-informed tools to evaluate findings related to the initiating event, mitigation system, and barrier cornerstones requires both staff and licensees to institutionalize the use of risk insights to a greater degree than in the past. NRR implemented several actions to train inspectors to use this new tool, including developing a guidance document, conducting numerous training sessions on the SDP, and making key staff members frequently available to respond to specific questions. NRR expects that inspectors will find the SDP easier to use as they gain familiarity with the SDP.

Early in the pilot program, the issue of which risk measure (CCDP or Δ CDF) is the most appropriate for performance assessment purposes was raised. This issue has been evaluated by the staff (details are contained in the Commission paper documenting the "Results of the Revised Reactor Oversight Process Pilot Program." The staff determined that Δ CDF is the proper metric based on the basis of its compatibility with PIs within the NRC Action Matrix. Additionally, the use of CCDP would produce inconsistent results (dependent on plant configuration) and require additional analysis of all plant maintenance configurations that existed concurrently with degraded equipment. However, the CCDP risk metric is considered useful as an input to the decision on how the NRC staff should follow up on a reactor event and is consistent with the methods used in the Accident Sequence Precursor (ASP) program. This use of CCDP has been made part of the staff's guidance on responding to events. This methodology was exercised as part of a feasibility review conducted at the end of the pilot program, and has been successfully used in several recent plant events in aiding regional management decision making.

A major issue was that the resource estimate for some inspection procedures appear to be inaccurate. Resource estimates were recently discussed with regional managers, and adjusted based on feedback from the pilot program. This is an area that will continue to be closely monitored during initial implementation. Additionally, the focus of the inspection procedure of crosscutting issues may need adjustment. A working group consisting of NRC and industry representatives is being formed to address this topic.

Actions

On the basis of feedback from regional administrators and survey respondents, the following actions have been taken:

- Although the formal evaluation of the survey had not yet been completed, informal results were used to select discussion issues at the internal and external lessons learned workshops in early January 2000. Also, individual issues were appropriately factored into the action plan for completion.
- The staff will closely monitor initial implementation of the oversight process, focusing on the adequacy of the process to identify declining performance and the effectiveness of inspection reports to communicate appropriate information to internal and external stakeholders. During the first year of implementation, the staff will establish a working group to evaluate the role of crosscutting issues in the inspection and assessment process.
- The guidance for inspection reports was changed to allow inspectors some leeway in documenting significant observations that relate to important crosscutting areas which may support the assessment process.
- NRR plans to address the usability of the SDP for assessing inspection findings in the fire protection area. Additionally, NRR plans to issue the containment SDP and shutdown SDP screening tool, and to issue a revised SDP guidance document (to incorporate recommendations from the public lessons-learned workshop in January 2000) before initial implementation at all sites.
- The containment leakage PI was deleted from the PI program as it was deemed to provide limited performance insights. The staff is searching for a replacement PI that is more meaningful.
- NRR held a meeting (February 9 and 10, 2000) with regional managers to discuss and make appropriate adjustments to estimated resources for various inspection procedures. Additionally, resource estimates for inspection planning and preparation will be closely monitored to develop more accurate estimates following the first year of initial implementation.
- To promote open communication with all stakeholders, the results of this formal evaluation of the survey will be distributed internally to the staff and released publicly to external stakeholders. An evaluation of the internal survey is also included in the Commission paper documenting the "Results of the Revised Reactor Oversight Process Pilot Program."

NRC PILOT PROGRAM INTERNAL STAKEHOLDER FEEDBACK SURVEY RESULTS

Attributes/Program Areas OVERALL PROCESS	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The new oversight process provides adequate assurance that plants are being operated safely	0.32	5	38	29	14	3	5
The new program provides sufficient regulatory attention to licensees with performance problems	0.11	4	30	27	17	6	10
The new program provides objectivity to the oversight process	0.69	14	50	15	11	2	2
The new process allows for identification of declining safety performance before significant reductions in safety margins	(-0.38)	1	17	28	32	10	6
The overall effort (inspection, enforcement, assessment) was more efficient than the old process	0.49	12	35	24	11	3	9
The information on the revised reactor oversight process available on the Web page provides adequate information	0.52	9	29	18	10	1	27
OVERALL PROCESS- Summary	0.29						

Attributes/Program Areas INSPECTION PROGRAM	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The scope of the baseline inspection procedures are adequate to address intended cornerstone attributes	0.32	5	43	18	17	4	7
The supplemental inspection procedures are adequate to provide sufficient information to confirm the adequacy of a licensee's root cause and corrective action effort	0.26	3	17	23	6	2	43
The level of effort required for conducting each inspection was consistent with that indicated in the inspection procedure	(-0.35)	3	22	13	36	11	9
The new procedures were clearly written	0.09	2	37	24	17	8	6
The new procedures were easy to use	0.21	3	37	26	15	5	8
The new inspection report format adequately communicates relevant information to the licensee and the public	(-0.28)	3	26	17	27	15	6
The new inspection procedures placed sufficient emphasis on planning	0.49	12	42	15	13	5	7
The new inspection procedures adequately sample risk-important aspects of each inspectable area, such that safety significance issues will be identified	0.31	4	37	27	15	2	8
INSPECTION PROGRAM - Summary	0.15						

Attributes/Program Areas PERFORMANCE INDICATOR	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The performance indicators provide information in areas that are risk significant	0.57	7	49	24	6	3	5
The performance indicators are understandable	0.51	5	50	19	13	1	6
For those areas covered by performance indicators (PIs), PIs are capable of providing an adequate indication of declining safety performance	(-0.21)	-0-	20	33	23	7	11
PERFORMANCE INDICATOR - Summary	0.29						

Attributes/Program Areas EFFECTIVENESS and EFFICIENCY	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The new oversight process improves the efficiency and effectiveness of the regulatory process, focusing agency resources on those issues with the most safety significance	0.42	11	36	31	13	3	-0-
The new oversight process reduces unnecessary administrative burden on the NRC	0.22	7	32	29	22	2	2
Compared to the old process (SALP, PPR, etc.), the new assessment and enforcement approaches are more efficient and effective	0.35	8	25	36	11	1	13
EFFECTIVENESS and EFFICIENCY - Summary	0.33						

Attributes/Program Areas ASSESSMENT and ENFORCEMENT	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
Compared to the old process, the actions recommended by the Action Matrix are appropriate for the significance level of safety issues	0.41	8	32	26	8	4	16
The Action Matrix provides adequate incentives for the licensee to improve safety performance	0.25	6	29	28	11	5	13
Imposition of NCVs and reliance on the licensee's corrective action program provide for an adequate approach to resolve issues of low safety significance	0.78	16	49	14	8	2	4
Enforcement actions that result from the Action Matrix are adequate	0.22	5	21	30	8	4	26
ASSESSMENT and ENFORCEMENT -Summary	0.42						

Attributes/Program Areas STAKEHOLDER CONFIDENCE	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The new oversight process increases the predictability, consistency, clarity, and objectivity of the NRC oversight process	0.44	8	42	25	9	5	5
The information provided by the NRC is appropriate for keeping the public informed of agency oversight activities related to the plants	(-0.02)	3	31	19	23	8	10
The NRC should use the new process to prioritize allegations received from the public and licensee employees	0.29	17	26	17	12	12	10
STAKEHOLDER CONFIDENCE - Summary	0.24						

Attributes/Program Areas SIGNIFICANCE DETERMINATION PROCESS	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The SDP adequately screens risk-significant issues	(-0.05)	2	31	25	23	8	5
The risk significance of inspection findings are correctly characterized using the SDP	(-0.05)	2	29	25	25	6	7
The SDP is easy to use	(-0.34)	3	18	23	34	10	6
SIGNIFICANCE DETERMINATION PROCESS - Summary	(-0.15)						

Attributes/Program Areas TRAINING	Statistical Result	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Not Familiar Enough to Answer
The training received in the new process provided the necessary knowledge to carry out the pilot program	0.28	-0-	50	10	17	5	12
The training adequately explained why the process was changed	0.76	10	52	12	9	-0-	11
The training adequately explained the roles of PIs and inspections	0.71	9	52	13	10	-0-	10
The training was helpful to me in explaining the process to stakeholders (licensees, the public)	0.62	11	43	16	10	2	12
TRAINING - Summary	0.59						