

Q: What actions has the NRC put in place to identify early indications of deteriorating safety conditions, decide on shutting down a plant, and/or monitor lessons learned from previous incidents?

A: One of the key objectives of the NRC inspection program is to determine the causes of declining performance before such performance reaches a level that may result in an undue risk to public health and safety. The inspection program focuses on activities and systems that are risk significant, that is, those activities and systems that have a potential to trigger an accident, can mitigate the effects of an accident, or increase the consequences of a possible accident. The inspection program also evaluates the "cross-cutting issues" of human performance, the "safety-conscious work environment," and how the utilities find and fix problems. Inspections beyond the baseline will be performed at plants with performance below established thresholds, as assessed through information gained from performance indicators and NRC inspections. Additional inspections may also be performed in response to a specific event or problem which may arise at a plant. As a result of the Davis Besse lessons learned, the staff has instituted several changes to the Reactor Oversight Process (ROP), which the staff believes should improve the agency's performance in this area. These changes include more discrete guidance for the processing of cross-cutting issues, and more focused inspections of longstanding equipment issues and equipment trends. Future changes include strengthening inspection guidance to consider operating experience.

In addition to the inspection activities discussed above, the NRC staff uses the allegation program to provide insights on licensee performance. The staff reviews data concerning allegations that the agency receives to identify any trends that may indicate a change in the work environment at a licensee's facility. Based on the results of these reviews and the results of follow-up activities regarding individual allegations, the staff determines whether the trend in allegations is indicative of a decline in the licensee's work environment.

The insights the staff gains from our inspection activities, performance indicators, and the analyses of allegation trends are considered during the ROP mid-cycle and end-of-cycle assessments. The assessment process enables the agency to arrive at objective conclusions about the licensee's safety performance. Based on this assessment information, the NRC determines the appropriate level of agency response, including supplemental inspection and pertinent regulatory actions ranging from management meetings up to and including orders for plant shutdown. If the NRC determines that there may be potential issues with a licensee's safety conscious work environment or safety culture, then this concern is elevated to NRC management for further discussion and evaluation. This may lead to possible action, such as the staff's current efforts at Salem and Hope Creek.

In addition, NRC senior management will review the adequacy of agency actions for plants with significant performance problems. The managers will also take a wider view both of the overall industry performance and of the performance of the agency's regulatory programs. The performance of plants requiring heightened agency scrutiny will then be discussed during a public meeting with the NRC Commissioners.

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