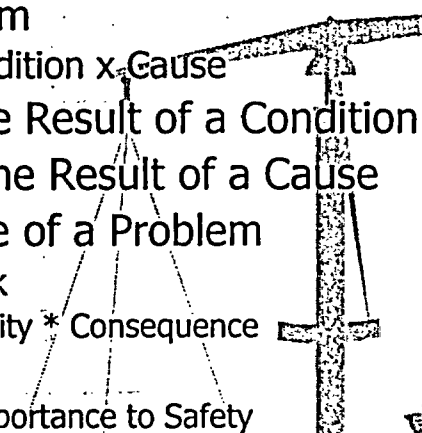


The Regulatory Gap Corrective Action

Description
Discussion
Recommendations

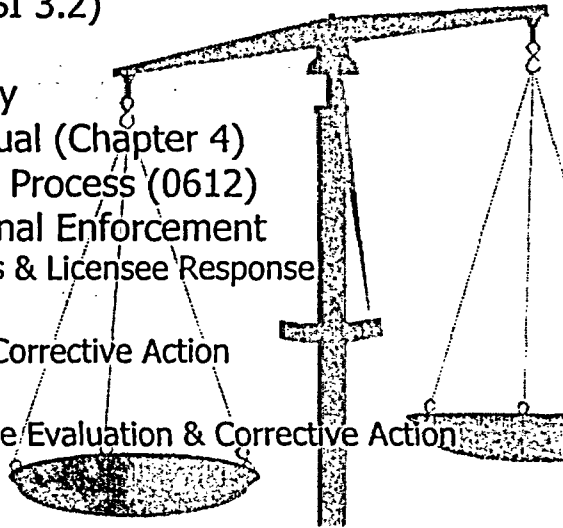


Definition

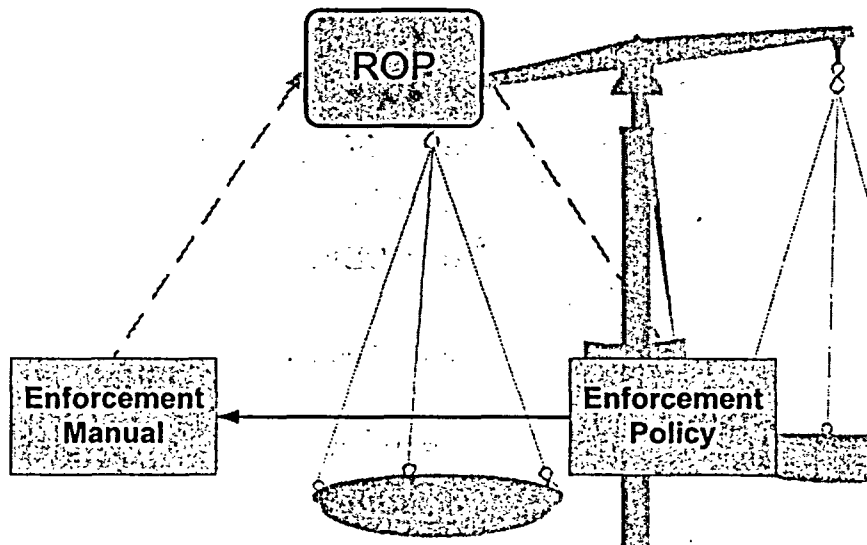
- In Equation Form
 - Problem = Condition x Cause
 - A Problem is the Result of a Condition
 - A Condition is the Result of a Cause
 - The Significance of a Problem
 - Function of Risk
 - Risk is Probability * Consequence
 - Consequence
 - Function of Importance to Safety
- 

Discussion

- CAQ & SCAQ (ANSI 3.2)
- 10CFR50 App B
- Enforcement Policy
- Enforcement Manual (Chapter 4)
- Reactor Oversight Process (0612)
- The Old - Traditional Enforcement
 - Level IV Violations & Licensee Response
- The New - ROP
 - Findings/NCVs & Corrective Action
- The Gap
 - Significance, Cause Evaluation & Corrective Action

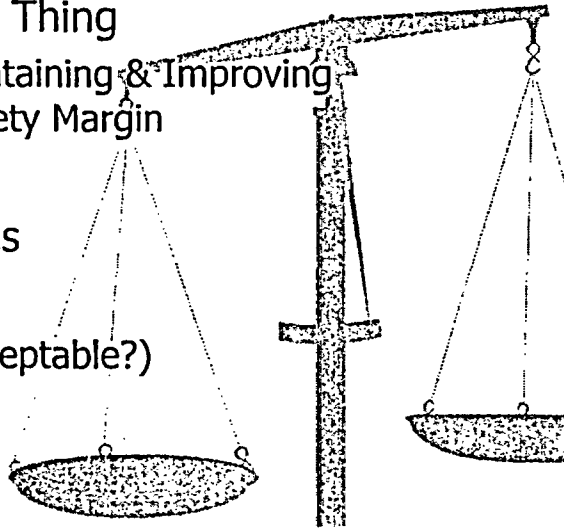


Discussion (con't)



Discussion (con't)

- Doing the Right Thing
 - Restoring, Maintaining & Improving Regulatory/Safety Margin
- Root Causes
- Apparent Causes
- Broke-Fix
 - (No Longer Acceptable?)
- Trending



Recommendations

- Develop a Common Ground
 - Clarify Conditions and Significant Conditions
 - Obtain Better Alignment (ROP/Enforcement)
- Bolster the use of Trending
 - Apparent Cause & Broke/Fix
 - Trigger Points
- The End Goal
 - Scrutable & Predictable
 - Efficient Use of Resources (NRC & Licensee)

