

# *U.S. NUCLEAR REGULATORY COMMISSION*

## *DIRECTIVE TRANSMITTAL*

**TN:** DT-06-08

To: NRC Management Directives Custodians

Subject: Transmittal of Management Directive 8.14, "Agency Action Review Meeting" (AARM)

Purpose: Management Directive and Handbook 8.14 are being revised to (1) clarify NRR's coordination of the AARM agenda and meeting minutes; (2) reflect OEDO's responsibility for AARM logistics; (3) delineate STP's coordination of AARM preparations and discussions with NMSS pertaining to which, if any, Agreement State licensees will be discussed; (4) describe STP's participation in the AARM; and (5) incorporate the role of NSIR in the AARM preparations and discussions as described in NRC Inspection Manual Chapter (IMC) 0320, "Operating Reactor Security Assessment Program."

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# Agency Action Review Meeting

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Directive  
8.14

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# U. S. Nuclear Regulatory Commission

Volume: 8 Licensee Oversight Programs

NRR

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## Agency Action Review Meeting

### Directive 8.14

#### Policy

(8.14-01)

It is the policy of the U.S. Nuclear Regulatory Commission to have its senior managers conduct an annual Agency Action Review Meeting (AARM). The AARM is an integral part of the evaluative process used by the agency to ensure the operational safety performance of nuclear licensees. The purposes of the AARM are (1) to review the agency actions resulting from the performance of nuclear reactor licensees for those plants with significant performance problems as determined by the reactor oversight process (ROP) action matrix, (2) to review results of the staff's assessment of ROP effectiveness, (3) to review industry performance trends, and (4) to review agency actions concerning fuel cycle facilities and other materials licensees (including Agreement State licensees) with significant performance problems.

#### Objectives

(8.14-02)

- To allow senior NRC managers to review agency actions that have been taken for those plants with significant performance problems as determined by the appropriate ROP action matrix and identify additional actions, as appropriate. (021)
- To ensure that coordinated courses of action have been developed and implemented for licensees of concern. (022)
- To ensure the efficacy of the ROP in meeting the agency's strategic goals. (023)

## Objectives

(8.14-02) (continued)

- To ensure that trends in industry and licensee performance are recognized and appropriately addressed. (024)
- To allow NRC senior managers to review agency actions that have been taken for those fuel cycle and other materials facilities (including Agreement State licensees) with significant safety or safeguards issues and identify additional actions, as applicable. (025)

## Organizational Responsibilities and Delegations of Authority (8.14-03)

Executive Director for Operations (EDO)  
(031)

- Oversees AARM activities and conducts the meeting. (a)
- Decides if any additional or alternate NRC actions besides those already completed or planned are to be conducted at a particular licensee's facility on the basis of discussions at the AARM. (b)
- Briefs the Commission on the results following each AARM. (c)

Director, Office of Nuclear Reactor  
Regulation (NRR)  
(032)

- Develops guidance for coordinating AARM preparation activities. (a)
- Coordinates AARM preparations and discussions pertaining to nuclear reactors within NRR and between other NRC Headquarters and regional offices. (b)

Organizational Responsibilities and  
Delegations of Authority  
(8.14-03) (continued)

Director, Office of Nuclear Reactor  
Regulation (NRR)  
(032) (continued)

- Coordinates and conducts end-of-cycle (EOC) summary meetings, if necessary, on the basis of the results of the regional EOC reviews. (c)
- Develops ROP program policies and procedures, and ensures the effectiveness of program implementation. (d)
- Participates in the AARM. (e)
- Coordinates with the Office of Nuclear Material Safety and Safeguards (NMSS) and other NRC Headquarters and regional offices on preparation of the AARM agenda and meeting minutes. (f)

Director, Office of Nuclear Material  
Safety and Safeguards (NMSS)  
(033)

- Coordinates preparations and discussions before the AARM pertaining to fuel cycle and other materials licensees and issues within NMSS, and among other NRC Headquarters and regional offices. In consultation with regional administrators, determines which, if any, fuel cycle or other materials licensees will be discussed at the AARM. (a)
- Participates in the AARM and leads discussions, as necessary. (b)

Organizational Responsibilities and  
Delegations of Authority  
(8.14-03) (continued)

Director, Office of Nuclear Security and  
Incident Response (NSIR)  
(034)

- Coordinates AARM preparations and discussions pertaining to the security cornerstone within NSIR and between other NRC Headquarters and regional offices. (a)
- Develops security-related ROP program policies and procedures, and ensures the effectiveness of program implementation. (b)
- Participates in the AARM. (c)
- Coordinates with the other NRC Headquarters and regional offices on preparation of the AARM agenda and meeting minutes. (d)

Director, Office of State and Tribal  
Programs (STP)  
(035)

- Coordinates preparations and discussions before the AARM pertaining to Agreement State licensees and issues within STP and the Agreement States, and among other NRC Headquarters and regional offices. In consultation with NMSS, the appropriate Agreement State Radiation Control Program Director (RCPD), and the appropriate regional administrator, determines which, if any, Agreement State licensees will be discussed at the AARM. (a)
- Participates in the AARM and leads discussions on Agreement State licensees, as necessary. (b)

Organizational Responsibilities and  
Delegations of Authority  
(8.14-03) (continued)

Regional Administrators  
(036)

- Brief the Director of NRR and other internal stakeholders at the EOC summary meeting on the performance of licensees of operating reactors in their respective regions for those plants with significant performance problems as described in Section I(B)(3) of the handbook. (a)
- Coordinate AARM preparations with the program offices. (b)
- Lead AARM discussions for reactor licensees in their respective regions. (c)
- Make recommendations to the Directors of NMSS and STP, as applicable, on candidate fuel cycle or other materials licensees to be discussed at the AARM. Brief the Directors of NMSS and STP and other internal stakeholders on the performance of fuel cycle and other materials facilities within the region that are identified for discussion as a result of significant safety or safeguards performance issues, and lead the related AARM discussions, as applicable. (d)

Directors of Staff Offices  
(037)

- Coordinate with program and regional offices in providing input to both the AARM and EOC meetings, as applicable. (a)
- Participate in the AARM as specified in the applicable portions of the handbook or as directed by the EDO. (b)



Organizational Responsibilities and  
Delegations of Authority  
(8.14-03) (continued)

Assistant for Operations,  
Office of the EDO  
(038)

- Coordinates AARM preparations with program and regional offices. (a)
- Is responsible for AARM logistics. (b)

Applicability  
(8.14-04)

The policy and guidance in this directive and handbook apply to all NRC employees.

Handbook  
(8.14-05)

Handbook 8.14 provides guidance for the preparation and conduct of the AARM.

References  
(8.14-06)

NRC Documents

NRC Enforcement Manual.

NRC Inspection Manual Chapter 0305, "Operating Reactor Assessment Program."

—0307, "Reactor Oversight Process Self-Assessment Program."

## References

(8.14-06) (continued)

- 0320, "Operating Reactor Security Assessment Program."
- 0350, "Oversight of Reactor Facilities in a Shutdown Condition With Significant Performance and/or Operational Concerns."
- 2201, "Security and Safeguards Inspection Program Commercial Power Reactors."
- 2515, "Light-Water Reactor Inspection Program—Operations Phase."
- 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program."
- 2604, "Licensee Performance Review."
- 2800, "Materials Inspection Program."

# Agency Action Review Meeting

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Handbook

8.14

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## Part I

### Preparation for the Agency Action Review Meeting (AARM)

#### General (A)

NRR will assemble the background information necessary to support AARM discussions concerning reactors into a notebook called the AARM Executive Summary. As discussed in more detail later in this handbook, the AARM will include a review of (a) the agency actions resulting from the performance of nuclear reactor licensees for those plants with significant performance problems as determined by the reactor oversight process (ROP) action matrices, (b) the results of the staff's assessment of ROP effectiveness, (c) the results of the industry performance trends analysis, and (d) agency actions concerning fuel cycle facilities and other materials licensees with significant performance problems, including categories of licensees. Throughout the management directive and handbook, the term "action matrices" refers to both the ROP action matrix in Inspection Manual Chapter (IMC) 0305 and the one in IMC 0320; also, any references to materials licensees shall be interpreted to include certificate holders and other regulated entities. (1)

Headquarters and regional staff will work together to develop the information to be used at the AARM. NRR will assemble this information into the AARM Executive Summary, which will be distributed to AARM participants in advance of the meeting. Informational copies will be provided to the Commission after the AARM. (2)

## End-of-Cycle Reviews and Summary Meetings for Reactors (B)

Each regional office will conduct an end-of-cycle (EOC) review for all operating reactors within its purview in accordance with IMC 0305, "Operating Reactor Assessment Program," and IMC 0320, "Operating Reactor Security Assessment Program." The EOC review is a comprehensive assessment of licensee performance using the most recent performance indicators and inspection findings from the previous 12 months. The staff conducts EOC reviews to analyze licensee performance information from inspection reports and performance indicators, along with other pertinent data, to confirm NRC actions and allocate resources. The EOC reviews are conducted within 6 weeks of the end of the assessment cycle. (1)

The review of each plant will emphasize the discussion of adverse performance trends and the effectiveness of licensee self-assessments and corrective actions for identified problems. The information contained in the plant issues matrix (PIM) and performance indicators are used by meeting participants to independently assess plant performance. Future inspection plans will also be reviewed at these meetings. (2)

In addition, the EOC summary meeting is conducted at the conclusion of the EOC reviews to discuss the results with the Director of NRR and other internal stakeholders for those plants with performance issues during the past annual assessment cycle that placed them in the "degraded cornerstone" column, the "multiple/repetitive degraded cornerstone" column, or the "unacceptable performance" column of the ROP action matrices. Plants that are under the IMC 0350, "Oversight of Reactor Facilities in a Shutdown Condition With Significant Performance and/or Operational Concerns," process will also be discussed at this meeting. The regional staff will also present the results for those plants that the regional offices consider to have substantive cross-cutting issues. The regional staff will coordinate with NRR to schedule and conduct the summary meeting. (3)

## Annual Assessment Letters for Reactors (C)

Annual assessment letters are issued to all plants that are under the normal assessment process following the EOC reviews. A separate letter, not publicly available, or a safeguards attachment to the ROP letter is issued for each plant, which provides NRC's assessment of security. The annual assessment letter or letters are produced for each plant that is under the normal assessment process on the basis of the results of the EOC reviews. The letters are issued to all plants within 3 weeks after completion of the EOC reviews in accordance with IMC 0305. (1)

The annual assessment letters will contain an overall statement of plant or security performance over the previous 12 months, a summary of risk-significant performance indicators or inspection findings, a discussion of substantive cross-cutting issues (as applicable), a summary of agency and licensee actions to address performance issues, and an inspection plan. (2)

As applicable, the letters will also note (a) the staff's plans to discuss a given plant with performance concerns at the upcoming AARM and (b) that a separate letter will be issued after the AARM if any agency actions changed as a result of the senior managers' discussions. (3)

## Annual Meeting With Reactor Licensee (D)

A public meeting with each licensee is conducted within approximately 16 weeks of the end of the assessment period to discuss the results of the NRC's annual assessment of the licensee's performance in accordance with IMC 0305. These meetings may be scheduled within 6 months of the issuance of the annual assessment letters for plants that have been in the "licensee response" or "regulatory response" column of the action matrices during the entire assessment period. The meeting is conducted following the issuance of the annual assessment letters and may occur before or after the AARM, based on scheduling priorities. (1)

## Annual Meeting With Reactor Licensee (D) (continued)

During this annual meeting, discussions involving safeguards information will be closed to the public and/or held at a separate location or time. (2)

The meeting is conducted in the vicinity of the site so that it is accessible to members of the public. Participation and the scope of the meeting vary, based on licensee performance in accordance with the ROP action matrices. The regions are encouraged to use the annual meeting as an opportunity to conduct public outreach activities as well. (3)

## Final AARM Preparations for Reactor Licensees (E)

Following the EOC reviews, the Headquarters and regional staff will work together to develop the information to be used at the AARM. NRR will assemble this information into the AARM Executive Summary, which will include (a) background papers that provide a synopsis of the performance of each plant to be discussed at the AARM; (b) a summary of the self-assessment of the ROP, including lessons learned and recommended policy adjustments; (c) the presentation and analysis of industry performance trends; (d) selected tables of relevant technical and regulatory information; (e) a meeting agenda; and (f) other information, as specified by the Executive Director for Operations (EDO). (1)

The cognizant regional office will prepare a narrative summary of plant performance for each plant to be discussed at the AARM. The narrative summary should be the plant performance summary used to support the EOC reviews and summary meetings, revised to incorporate any insights developed during those meetings. (2)

The regions will also verify the completeness and accuracy of the information contained in the Reactor Program System (RPS) regarding the PIMs and inspection plans for each plant to be discussed at the AARM. Upon notification by the regions, NRR will



Final AARM Preparations for  
Reactor Licensees (E) (continued)

produce the PIM and inspection plan reports from the RPS for inclusion in the AARM Executive Summaries. NRR will also produce performance indicator summary reports from the ROP Web site for inclusion in the AARM Executive Summaries. (3)

NRR will prepare a report on an annual basis that includes an analysis and self-assessment of the ROP in accordance with IMC 0307, "Reactor Oversight Process Self-Assessment Program." The annual report of the ROP self-assessment will be included in the AARM Executive Summary and provided to the Commission. The self-assessment also ensures that the causes for ROP action matrix deviations are understood and identifies any necessary changes to the ROP. This specific aspect of the self-assessment must be discussed at the AARM and the Commissioners must also be briefed on this evaluation. (4)

NRR will also prepare a report on an annual basis that includes an analysis of industry performance trends. The annual report of the industry trend analysis will be forwarded to the Commission and included in the AARM Executive Summary. (5)

The staff shall ensure that sensitive information used in the AARM and in the Executive Summary binders is appropriately controlled pursuant to requirements. (6)

The AARM Executive Summary notebooks will be distributed to AARM participants in advance of the meeting. The notebooks will be provided to the Commission after the AARM. (7)

## Final AARM Preparations for Fuel Cycle and Other Materials Licensees (F)

NMSS and the regional offices will consider Licensee Performance Reviews (LPRs) in reviewing fuel cycle licensees as possible candidates for the AARM. The cognizant regional office will prepare a narrative summary of licensee performance for each fuel cycle or materials licensee to be discussed at the AARM. NMSS, in collaboration with the regions, will prepare and distribute briefing materials for fuel cycle and other materials facilities to AARM participants in advance of the meeting, as applicable. STP, in collaboration with the regions, will prepare and distribute briefing materials for Agreement State licensees to AARM participants in advance of the meeting, as applicable. Headquarters and regional staff will work together to develop the information to be used at the AARM. NRR will assemble this information into the AARM Executive Summary.

## Part II

### Conduct of the Agency Action Review Meeting (AARM)

#### General (A)

The AARM is part of an integrated evaluative process used by the agency to ensure the operational safety and security performance of nuclear licensees. The AARM includes a review of plant performance to confirm the appropriateness of agency actions for those plants with significant performance problems as determined by the reactor oversight process (ROP) action matrices, as well as a review of material licensee issues to determine whether current processes are sufficient. The AARM also includes a review of overall industry performance and trends for both reactors and materials licensees (including Agreement State licensees), a review of the results of the ROP self-assessment, and action matrix deviations. (1)

As a result of the end-of-cycle (EOC) reviews, there may conceivably be no reactor plants with performance concerns that would warrant discussion at the AARM. There may also be no fuel cycle or other materials licensees that warrant discussion at the AARM. Since the AARM also serves as a forum to review overall industry trends and the effectiveness of the ROP, the AARM will be conducted on an annual basis regardless of whether any individual licensees are scheduled to be discussed. (2)

The Executive Director for Operations (EDO) will direct the conduct of the AARM. Participation will vary, depending on the portion of the AARM involved. The attendees will typically include, at varying times, the Deputy Executive Director for Reactor and Preparedness Programs; the Deputy Executive Director for Materials, Research, State and Compliance Programs; the regional administrators; the Directors of NRR, NMSS, STP, the Office of Nuclear Regulatory Research (RES), the Office of Nuclear Security and Incident Response (NSIR), the Office of

### General (A) (continued)

Enforcement (OE), and the Office of Investigations (OI); and other support personnel, such as the Office of the General Counsel (OGC), as directed. Participation in each portion of the AARM will be as noted in the relevant sections of this handbook or as determined by the EDO. (3)

The AARM is conducted annually and typically occurs several weeks after issuance of the annual assessment letters to reactor licensees that result from the EOC reviews. Following each AARM, reactor licensees are informed of any NRC decisions or actions that differ from those conveyed in the annual assessment letters if any agency actions changed as a result of the senior managers' discussions. The Commission is briefed on the AARM results at a public meeting. (4)

### Reactor Plant Performance Discussions and Review of Agency Actions (B)

The discussions of plant performance are led by the cognizant regional administrator. Plant performance discussions are limited to those plants that have been in the "multiple/repetitive degraded cornerstone" column or the "unacceptable performance" column of the action matrices at any time over the previous annual assessment cycle. Additionally, plants may be discussed if it is determined that they will move into the "multiple/repetitive degraded" cornerstone column or the "unacceptable performance" column of the action matrices before the AARM. Plants that are under the Inspection Manual Chapter (IMC) 0350 process will also be discussed at this meeting. (1)

Primary participants in the plant performance discussion portion of the AARM will include the EDO, the Deputy Executive Director for Reactor and Preparedness Programs, the Director of NRR, and the regional administrators. In addition, the Directors of RES, NSIR, OE, OGC, and OI may also participate if issues relative to their areas of responsibility will be discussed. (2)

## Reactor Plant Performance Discussions and Review of Agency Actions (B) (continued)

As noted in IMCs 0305 and 0320, agency actions based on licensee performance are expected to be in accordance with the ROP action matrices. Actions are taken as necessary to address performance issues as they are identified; the agency will not wait for annual reviews to take actions and allocate resources. The ROP action matrices provide for a range of actions for the NRC to take to appropriately address plant performance issues. Because actions would be taken on an ongoing basis, the role of the AARM is more informational and confirmatory. The senior managers will review the agency's actions that have been planned or completed to confirm their appropriateness and effectiveness. (3)

The staff shall ensure that safeguards and other sensitive unclassified information is appropriately controlled and not released to the public. Furthermore, attendance of personnel must be controlled as necessary when sensitive information is being discussed, with additional focus on control of safeguards information. (4)

As a result of AARM discussions, the senior managers may identify additional or alternate actions and/or allocation of agencywide resources. These actions should all be encompassed by and in accordance with the ROP action matrices. This step may include conducting a special team inspection to ascertain the causes of the performance problems, holding discussions between senior officials of both NRC and the licensee to further enhance the quality of communications, or convening a meeting with the Commission to review plant performance and licensee plans to improve performance. (5)

Any or all of the actions discussed in the applicable sections of IMC 0305 or IMC 0320 are appropriate for plants that are in the "multiple/repetitive degraded cornerstone" column or the "unacceptable performance" column of the ROP action matrices. IMC 0350, "Oversight of Reactor Facilities in a Shutdown

## Reactor Plant Performance Discussions and Review of Agency Actions (B) (continued)

Condition With Significant Performance and/or Operational Concerns,” details specific actions for plants under the IMC 0350 process. The objective of these actions is to ensure that the licensee establishes a plan for improvement that incorporates measurable goals to determine when performance has improved. Whether and when to take any one of these actions is a determination that will be made at the NRC's sole discretion. The contents of this handbook and IMC 0305 or IMC 0320 do not restrict NRC from taking any necessary actions to fulfill its responsibilities under any applicable law. (6)

## Reactor Oversight Process Self-Assessment (C)

The ROP self-assessment program evaluates how well the ROP meets its goals of being objective, risk informed, understandable, and predictable, as well as meeting the agency's strategic performance goals as stipulated in the NRC Strategic Plan. (1)

The ROP self-assessment program is implemented in accordance with IMC 0307, “Reactor Oversight Process Self-Assessment Program.” The self-assessment program collects information from various sources, including data and feedback from both internal and external stakeholders. Self-assessment metrics are also used to assist the agency in determining if the ROP is meeting its stated objectives and the agency's strategic goals. This program is intended to assess the effectiveness of the ROP and to develop recommendations for improvement. (2)

## Reactor Oversight Process

### Self-Assessment (C) (continued)

One specific aspect of the ROP self-assessment described above is action matrix deviations. The self-assessment ensures that the causes for the deviations are understood and identifies any necessary changes to the ROP to improve the guidance documents. This specific aspect of the self-assessment must be discussed at the AARM, and the Commissioners must also be briefed on this evaluation. (3)

NRR will annually prepare an ROP self-assessment. This report will be included in the AARM Executive Summary, will be used as the basis for discussions during the AARM regarding the ROP self-assessment, and will be provided to the Commission. (4)

Participants in the ROP self-assessment portion of the AARM will include the EDO, the Deputy Executive Director for Reactor and Preparedness Programs, the Directors of NRR, RES, and OE, and the regional administrators. Other office directors may also participate as applicable and at the discretion of the EDO. (5)

### Analysis of Reactor Industry Trends (D)

To meet a key agency performance goal measure on the number of "statistically significant adverse industry trends in safety performance," NRC uses selected indicators to monitor industry performance. The data for these indicators can come from a variety of sources, such as data required to be reported to NRC under 10 CFR 50.73, "Licensee Event Report System," Monthly Operating Reports, and data voluntarily submitted by licensees for the ROP. (1)

The industry data are compiled and examined for any significant trends in performance, particularly adverse trends. If any statistically significant trends are identified, NRC conducts further examination of the data to determine what, if any, actions may be appropriate. (2)

## Analysis of Reactor Industry Trends (D) (continued)

NRR will prepare a report on an annual basis that includes a trend analysis of industry performance. This report will be included in the AARM Executive Summary and will be used as the basis for discussions during the AARM regarding the analysis of industry trends. This report will be provided to the Commission and made publicly available. (3)

Participants in the industry trends portion of the AARM will include the EDO, the Deputy Executive Director for Reactor and Preparedness Programs, the Directors of NRR and RES, and the regional administrators. The Directors of OE, OGC, and OI may also participate as applicable and at the discretion of the EDO. (4)

## Discussion of Fuel Cycle and Other Materials Facilities (E)

The Director of NMSS, the Director of STP, or regional administrators, as directed by the EDO, will lead the discussion of performance for any fuel cycle or other materials licensees, including categories of licensees, that have significant safety or safeguards performance issues. Primary participants in these discussions will include the EDO, the Deputy Executive Director for Materials, Research, State and Compliance Programs, the Director of NMSS, the Director of STP, and the regional administrators. In addition, other office directors may participate as appropriate and at the discretion of the EDO. (1)

The senior managers will review the agency's actions that have been planned or completed to confirm their appropriateness and effectiveness. As a result of AARM discussions, the senior managers may recommend additional or alternate actions and/or allocation of agencywide resources. (2)



## Correspondence Following the AARM (F)

In addition to the annual assessment letters for reactors, NRC will issue separate letters to those reactor plants discussed during the AARM **if** any agency actions changed as a result of the senior managers' discussions. These letters are issued within 1 week following completion of the AARM, and 2 to 3 weeks before the Commission briefing. For fuel cycle and other materials licensees, the agency will evaluate the need to issue a letter to individual licensees or categories of licensees on a case-by-case basis. For Agreement State licensees, the agency will consult with the Agreement State Radiation Control Program Director when evaluating the need to issue a letter to individual licensees or categories of licensees on a case-by-case basis. (1)

At the discretion of the EDO, meeting minutes may be issued that summarize the key discussions and conclusions from the AARM. In most cases, these minutes may not be necessary unless agency actions change as a result of the AARM discussions. At a minimum, the staff will provide feedback to the Commission that there were no additional agency actions recommended as a result of individual plant discussions. If issued, the AARM meeting minutes will be provided to the Commission 2 weeks after the AARM. The staff will coordinate the minutes or other communications with OGC to ensure conformance to separation of functions requirements. (2)

## Commission Briefing (G)

The staff will brief the Commission on the AARM results at a public meeting, typically within 4 weeks following completion of the AARM. The staff will coordinate briefing materials with OGC. There are typically two sessions for the Commission briefing: one for the ROP and one for materials facilities. The staff delivering the briefing will typically include the EDO and the appropriate office directors or regional administrators, as directed by the EDO. (1)

## Commission Briefing (G) (continued)

The public briefing will include discussions of those plants that have significant performance problems and that were discussed during the AARM, if applicable. The staff's briefing will also include discussions of the results of the staff's self-assessment of the ROP, including lessons learned and recommended policy adjustments, changes to the ROP as a result of evaluating action matrix deviations, and an analysis of industry performance trends. (2)

The briefing may also include discussions of licensee performance for fuel cycle and other materials licensees (including Agreement State licensees), as deemed appropriate by the EDO. (3)

Representatives of those licensees being discussed may also be given the opportunity to prepare and deliver briefings if deemed appropriate by the EDO or the Commission. (4)

Information regarding licensee performance within the security cornerstone will be withheld from public disclosure and thus will not be discussed at the public meeting. The Commissioners will be briefed on security discussion topics from the AARM in a separate non-public meeting. (5)