



CONSTRUCTION REACTOR OVERSIGHT PROCESS

TASK FORCE MEETING

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Meeting Purpose

- **Inform interested stakeholders on planned cROP changes**
- **Provide a forum for cROP program feedback**

cROP Pilot

- **Issued 8 Vogtle and 4 Summer inspection reports**
- **All findings issued to-date were of very low safety significance**
 - 7 findings at Vogtle
 - 6 findings at Summer
- **Preliminary white finding at V.C. Summer regarding auxiliary and shield building wall design; applies to Vogtle as well**

cROP Pilot

- **Conducted quarterly, mid-cycle, and end-of-cycle assessments for each unit**
- **All units in licensee-response column of construction action matrix**
- **Corrective action programs at Vogtle and Summer determined to be adequately developed and implemented**
- **EOC assessment letters issued March 4**
- **Public assessment meetings conducted in mid-April near both sites**

Key cROP Revisions to Support Full Implementation

- **Described in SECY 013-0042, “Construction Reactor Oversight Process Self-Assessment for Calendar Year 2012”**
- **Plan to align substantive cross-cutting issue criteria with ROP**
 - **Cross-cutting aspects in the cross-cutting area of Baseline Program to be considered in performance assessments for one year**
 - **SCWE-related issues from an 18-month period (i.e., the current mid- or end-of-cycle assessment period and the two quarters preceding that period) to be considered**
- **Plan to eliminate most different types of inspection findings**
 - **Findings will now be designated as construction findings or ITAAC findings**
- **Plan to provide additional guidance to better define roles and responsibilities of vendors/suppliers and contractors**

Changes Planned

- **Plan to develop a construction chapter in the enforcement manual and revise the Enforcement Policy to reflect guidance in EGM 11-06 (will develop in parallel to implementation).**
- **Plan to clarify when a performance deficiency can be considered to affect a system/structure design function as used in the SDP – under development**

Pilot Exit Strategy

- **Latest revision of pilot guidance documents will remain in effect into 2013**
- **Incorporate planned revisions and issue final guidance documents to support full implementation by 7/1/2013**

NEI Topics

- **Clarify guidance in the NRC IMCs and IPs to define what is “construction.” (i.e, use the definition in 10 CFR 50.10)**
- **Clarify guidance in the NRC IMC and IPs to state that findings related to SSCs that have not been constructed (as defined in Item 1 above) are not subject to escalated enforcement (i.e., would be Green or minor violations). This would meet the intent of the cROP as developed and allow for findings to be appropriately documented by the NRC and corrected via the licensee/Consortium corrective action programs. To do otherwise diminishes credit given to an effective corrective action program and associated extent of condition reviews conducted.**

NEI Topics

- **IMC 0613P states the following:**

“Note that if the finding is determined to be greater than green, identification credit is irrelevant.” (Page AppB-5)

This can create a situation where the licensee or their contractor or agent identify the need for a significant change in design that the NRC later determines has a greater-than-green significance, NRC could issue a white or greater finding even though the licensee identified the issue. Based on NRC determination of a licensee’s CAP adequacy and the treatment of operating plants in similar situations, it is recommended that NRC guidance be changed to reflect that if the licensee or their contractor or agent identify an issue, then this issue should be considered licensee identified and not subject to escalated enforcement.