

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

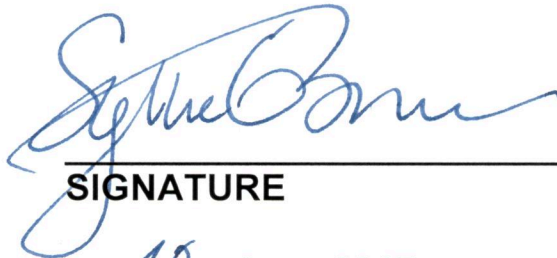
FROM: Chairman Burns

SUBJECT: COMSECY-15-0014: PROPOSED ELIMINATION OF
ANNUAL REPORTING REQUIREMENTS FOR
SPECIFIC EVALUATIONS WITHIN THE REACTOR
OVERSIGHT PROCESS SELF-ASSESSMENT
PROCESS

Approved XX Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached _____ None XX



SIGNATURE

10 June 2015

DATE

Entered in "STARS" Yes x No _____

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER SVINICKI

SUBJECT: COMSECY-15-0014: PROPOSED ELIMINATION OF
ANNUAL REPORTING REQUIREMENTS FOR
SPECIFIC EVALUATIONS WITHIN THE REACTOR
OVERSIGHT PROCESS SELF-ASSESSMENT
PROCESS

Approved XX In Part Disapproved XX In Part Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached XX None _____



SIGNATURE

06/ 11 /15

DATE


Entered in "STARS" Yes ✓ No _____

**Commissioner Svinicki's Comments on COMSECY-15-0014
Proposed Elimination of Annual Reporting Requirements for Specific Evaluations Within
the Reactor Oversight Process Self-Assessment Process**

I approve in part and disapprove in part. I agree with the staff's assessment that the regulatory impact summary report has been overtaken by the agency's broader efforts on cumulative regulatory impact. I approve the elimination of this item as a standalone report. It is essential, however, that use of NRC Form 649, "Site Visit Observation" be continued, as the staff pledges to do. This process is the singular means of soliciting feedback on inspector objectivity and ensuring appropriate actions are taken to address negative feedback, therefore serving an internal corrective action function. Similarly, the ROP resource expenditure analysis has likely outlived its usefulness as a standalone item, separate and distinct from the agency's overarching budgeting and resourcing process. I approve its elimination.

I disapprove, however, the elimination of annual reporting on issues associated with resident inspector staffing and demographics. To a person, every single Regional Administrator accounts to me, in our routine meetings, the ongoing challenges associated with this area of staffing and, by my observation, filling these positions does not seem to be getting any easier. This is the only position for which the agency has a mandatory rotation policy. Furthermore, it is a position that is described in every single NRC press release announcing the selection of resident inspectors as "the agency's eyes and ears" in conducting safety oversight at nuclear power plants. Consequently, it is essential to keep the Commission's attention on this matter through routine reporting. If the report on demographics is eliminated, the staff should submit annually a compilation of four high level summaries – one from each Region – containing the number of resident inspector positions turned over that year and the number due to turn over in the coming two years, the number of qualified candidates who applied for each opportunity that arose and their relevant years of experience, and the number of resident inspectors currently serving under extension of time (beyond the agency's rotation metric) and how long these extensions are expected to exist before mandatory rotation can be accomplished.

The staff has made many expressions in this COMSECY regarding the superior nature of the new self-assessment tools it intends to develop and put in place. As a longtime reader of the existing self-assessment documents, I look forward to judging the staff's success against this commitment.



Kristine L. Svinicki 06/11/15

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Ostendorff

SUBJECT: COMSECY-15-0014: PROPOSED ELIMINATION OF ANNUAL REPORTING REQUIREMENTS FOR SPECIFIC EVALUATIONS WITHIN THE REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT PROCESS

Approved XX Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below XX Attached _____ None _____

In today's resource constrained environment, I applaud the staff's efforts to identify activities that have outlived their necessity. Therefore I approve the staff's request to eliminate annual reporting of the regulatory impact summary, the ROP resource expenditures analysis, and the resident inspector demographic analysis. My approval should not be seen as a signal that these topics are not of importance. For example, it is important for the staff to continue to monitor appropriate metrics for resident inspector staffing. However, I agree that this would better be accomplished under the broader umbrella of human capital management. Similarly, reporting reactor oversight resource expenditures would be better accomplished under the broader umbrella of the Agency's planning, budgeting, and performance management process.



SIGNATURE

5/29/15

DATE

Entered in "STARS" Yes _____ No _____

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Baran

SUBJECT: COMSECY-15-0014: PROPOSED ELIMINATION OF ANNUAL REPORTING REQUIREMENTS FOR SPECIFIC EVALUATIONS WITHIN THE REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT PROCESS

Approved ✓ Disapproved Abstain

Not Participating

COMMENTS: Below ✓ Attached None

I approve the staff's recommendation to eliminate the requirement that the staff provide the following enclosures to the annual Reactor Oversight Process self-assessment: the regulatory impact summary, resident inspector demographic analysis, and ROP resource expenditure analysis. As part of the ongoing evaluation of ROP improvements, the staff has found that "[t]hese detailed evaluations ... offer limited insights, are redundant to other processes, and do not appear to return the level of value as they did when they were initiated." I appreciate that the staff will remain focused on these substantive issues, continue to collect the underlying data, and explore alternative metrics that could provide more valuable insights.


SIGNATURE

6/16/15
DATE

Entered in "STARS" Yes ✓ No