

Project Plan for Revision of Inspection Manual Chapter 0609 Appendix M

Purpose

The objective of this project is to revise IMC 609 Appendix M, “Significance Determination Process (SDP) Using Qualitative Criteria,” in order to add clarity and specificity to the conditions under which the Appendix M should be used, and to establish a more systematic approach to assessing significance of licensee performance deficiencies using an Integrated Risk-Informed Decision Making (IRIDM) framework. This objective will be accomplished by performing these activities:

- 1) Conduct tabletop exercises of previous SDP cases that utilized Appendix M to provide proof of concept, in a series of public meetings and workshops with internal and external stakeholders
- 2) Provide a draft document to internal NRC stakeholders for comment and feedback to seek alignment
- 3) Conduct additional workshops and public meetings (through the ROP Working Group) to engage external stakeholders for comment and feedback

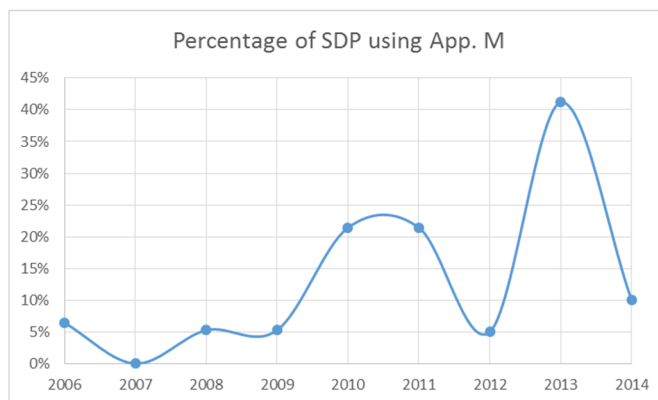
Goals for the Draft Document of New IMC 609 Appendix M

- Provide clear and concise entry conditions for the use of Appendix M
- Identify the set of key decision attributes that is relevant for each specific entry condition
- Develop guidance to establish the relative importance of each decision attribute
- Provide a formal IRIDM tool for use in the SDP that adheres to the principles of the ROP

Background

Appendix M was developed in 2006 when it was realized that the existing SDP tools could not cover every possible type of performance deficiency discovered through baseline inspections. It was designed to be utilized infrequently; however, Appendix M has been used for final determination of 13% of Greater-than-Green findings over the past 8 years.

The current version of Appendix M provides guidance for making regulatory decisions using a deterministic framework of a small set of qualitative factors. This approach may have resulted in less than optimal decision making with respect to risk-informed and reliable regulatory outcomes. This concern has been noted by industry, the Commission and the NRC staff. The SDP Business Process Improvement initiative completed in 2014 provided a recommendation to update Appendix M to clarify entry criteria and provide a more specific integrated risk-informed decision making process. In addition, in the Staff Requirements Memorandum (SRM) on SECY 2013-0137, the Commission tasked the staff to “evaluate the need to provide additional clarity on the use of qualitative factors for operating reactors to provide more transparency and predictability to the process.” In the SRM for the Strategic



Programmatic Overview of the Operating Reactors Business Line (SRM-M150806B, Agencywide Documents Access and Management System ML15231A108), the Commission tasked the staff to “pilot the revisions and hold public meetings or workshops to clarify their approach to risk-informing the [significance determination] process.”

NRR/DRA has prepared a draft revision for Appendix M. This revised document will likely receive significant stakeholder interest, both internally and externally, and will be necessitating significant discussion and comment prior to issuance. The proposed project plan has a relatively aggressive timeline with the acknowledgement that as the project progresses, stakeholder concerns and comments may cause deadlines to be adjusted accordingly.

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SharePoint: <http://fusion.nrc.gov/nrr/team/dirs/ipab/appendixm/default.aspx>

Project Milestones and Schedule

Date	Staff Actions	Status
5/12/16	Develop Project Plan and Goals	Complete
5/12/16	Provide initial briefing to DRA/DIRS management	Complete
5/24/16	Provide presentation to SRAs at Counterpart Meeting	Complete
5/27/16	Provide briefing to the Regions at DIRS Bi-weekly Division Directors Call	Complete
6/15/16	Inform ROP WG on the expectations of 1 st workshop scheduled on July 14, 2016	
6/16/16	Provide periodic briefing to DRA/DIRS management	
7/5/16	Seek informal comment from internal NRC stakeholders	
7/13/16	Provide briefing on Project Plan and Status to DEDO Direct Reports	
7/14/16	Conduct 1 st industry workshop with discussions on: (a) Entry Conditions, (b) Industry Views on Relevant Decision Attributes, (c) Rating of Decision Attributes, and (d) Framework for Making Integrated Decision	
7/15/16	Provide periodic briefing to DRA/DIRS management	
8/15/16	Provide draft document publicly in ADAMS	
8/18/16	Provide periodic briefing to DRA/DIRS management	
9/14/16	Conduct 2 nd industry workshop with incorporated internal and external input	
9/15/16	Provide periodic briefing to DRA/DIRS management	
10/20/16	Provide periodic briefing to DRA/DIRS management	
10/27/16	Provide briefing to Commission Technical Assistants	
11/16/16	Conduct Public Meeting to discuss status and resolve comments	
11/17/16	Provide periodic briefing to DRA/DIRS management	
12/15/16	Provide periodic briefing to DRA/DIRS management	

1/18/17	Conduct Public Meeting for Table Top exercises, if necessary	
1/19/17	Provide periodic briefing to DRA/DIRS management	
2/16/17	Provide periodic briefing to DRA/DIRS management	
3/15/17	Conduct Public Meeting to discuss final product and pilot phase	
3/16/17	Provide periodic briefing to DRA/DIRS management	
4/1/17	Provide draft document to internal NRC stakeholders for 30-day comment period	
4/20/17	Provide periodic briefing to DRA/DIRS management	
5/15/17	Issue commented document for pilot application	
5/18/17	Provide periodic briefing to DRA/DIRS management	
6/1/17	Conduct pilot implementation	
6/22/17	Provide periodic briefing to DRA/DIRS management	
1/1/18	Final Implementation	
TBD	Provide briefing to Division Directors Counterpart Meeting	