

## **Enclosure 2**

Handouts and Presentations Discussed during the  
September 21, 2016 ROP WG Public Meeting

Dated October 13, 2016

# ***Problem Identification & Resolution (PI&R) Enhancement Update***

**Ross Telson, IP 71152 Lead**

**September 21, 2016; 10:30-11:00 AM**

**September 2016 Reactor Oversight Process  
Monthly Public Meeting, NRC HQ**

# ***Preview***

- **Scope Reduced to 3 Enhancements**
- **Delta from Current Process**
- **Enhancement Drivers (Problem Statements)**
- **Licensees Impacts**
- **Inspector Impacts**
- **Some Anticipated Specifics**
- **What's Next**
- **Review And Q&A**

# ***Scope Reduced to 3 Enhancements***

- 1. Track & Inspect Completed Corrective Actions for All Greater-than-Greens**
- 2. Annual Follow-up Inspection of Selected Significant Long Term Issues**
- 3. Return Daily CAP Screening from IP 71152 to IMC 2515 Appendix D**

# ***Delta from Current Process***

- **Tracking, Scheduling, Transparency & Predictability**
  - **Reactor Program System (RPS)**
  - **Inspection Documentation**
- **Requirement & Resource Reallocation**
  - **Biennial -> Annual Follow-up**
  - **IP 71152 -> IMC 2515 App. D**

# ***Principle Enhancement Drivers (Problem Statements)***

- **General**
  - **Commission Staff Requirements**
  - **IMC 0307 App B Baseline IP Reviews**
- **Enhancements 1 & 2**
  - **Browns Ferry IP 95003 Lessons Learned**
  - **Fort Calhoun IMC 0350 Lessons Learned**
- **Enhancement 3**
  - **Plant Status vs. Baseline Inspection**

# ***Licensees Impacts***

- **No change in NRC requirements or expectations**
- **Enhanced NRC tracking, scheduling, and follow-up of significant issues**
- **Improved NRC separation of plant status and baseline inspection**
- **Reduced emphasis on- and impact of biennial team inspection**

# ***Inspector Impacts***

- **Tracking & IP 71152 annual follow-up of all completed greater-than-green (GTG) planned corrective actions (PCAs)**
- **Relocation of PCA inspection requirements & resources from biennial (-40 hours) to annual follow-up (+20 hours; 4-8 becomes 5-9)**
- **Return daily CAP review resources (129 to 225 hours), requirements, and commitment from IP 71152 to IMC 2515 App D Plant Status**
- **Decline in PI&R sample & effort over-use (~ 130%) and high site-to-site variance**



# ***Some Anticipated Specifics***

- **Before closing GTG Issue & IP-9500X,\* IP 71152 follow-up must be scheduled in RPS based on licensee's PCA completion date.**
- **Tracking Information (i.e. CAP Doc. No., RPS PCA Tracking No., and PCA completion date) must be documented in supplemental IR (and, ideally, on the action matrix web page – as public cannot access RPS).**
- **One required IP 71152 follow-up per supplemental inspection**

# ***What's Next***

- **Complete Enhanced Draft IP 71152, and other companion changes (i.e. IMC 2515 App D): End of Sep 2016**
- **Internal Comment Resolution**
- **Publish Revised Docs: Early Dec 2016**
- **Target Effective Date: 1 Jan 2017**

# ***Review***

- **Scope Reduced to 3 Enhancements**
- **Delta from Current Process**
- **Enhancement Drivers (Problem Statements)**
- **Licensees Impacts**
- **Inspector Impacts**
- **Some Anticipated Specifics**
- **What's Next**
- **Review And Q&A**



# ***END OF PRESENTATION***

**Questions?**

# References

- April 2014, ROP Enhancement Project Encl. 6 ([ML14017A391](#)) [P]
- March 2014, ROP Independent Assessment Report (“McDermott Report” [ML14035A571](#)) [P]
- December 2015, Staff Actions on McDermott Report Recommendations and Suggestions ([ML15264A171](#)) [P]
- June 2013, periodic [assessment of IP 71152 “Problem Identification and Resolution”](#) [NP]
- ROP Feedback Forms ([ML16050A099](#)) [NP]
- IP 71152(B) Hours And Samples Per Unit 2012-2015 ([ML16167A362](#)) [NP]

# Monitoring Nuclear Safety Culture

*A fleet approach to monitor and assess equipment, process, and people*

Lori Hayes, Manager - Fleet Employee Concerns Program – Duke Energy




# Old Process - NEI 09-07 Duke Implementation


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- Suggested NEI inputs gathered
- Package assembled
- Package distributed to Nuclear Safety Culture Monitoring Panel (NSCMP)
- Panel meeting held
- Some cognitive discussion on organizations' culture
- Binning of inputs determine trait "grade"
- Corrective actions initiated based on "grade"
- Trait "grades" presented to Senior Leadership Team

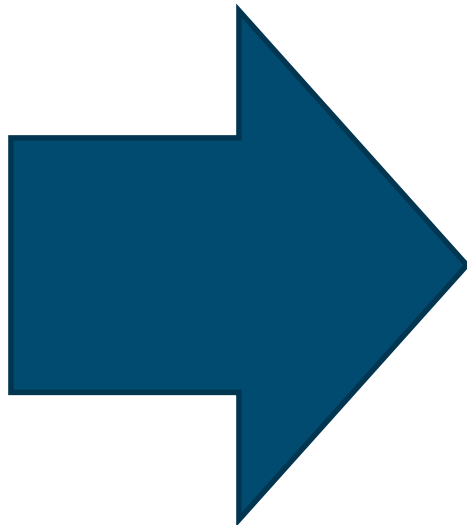
# Performance Trending Process – What's New?

## Old Process


	Information Use
NUCLEAR OPERATING FLEET ADMINISTRATIVE PROCEDURE	
AD-PI-ALL-0201	
CORRECTIVE ACTION PROGRAM (CAP) TRENDING	

	Information Use
NUCLEAR OPERATING FLEET ADMINISTRATIVE PROCEDURE	
AD-PI-ALL-0200	
INTEGRATED PERFORMANCE ASSESSMENT (IPA)	

	Information Use
NUCLEAR OPERATING FLEET ADMINISTRATIVE PROCEDURE	
AD-PI-ALL-0004	
NUCLEAR SAFETY CULTURE PROGRAM	

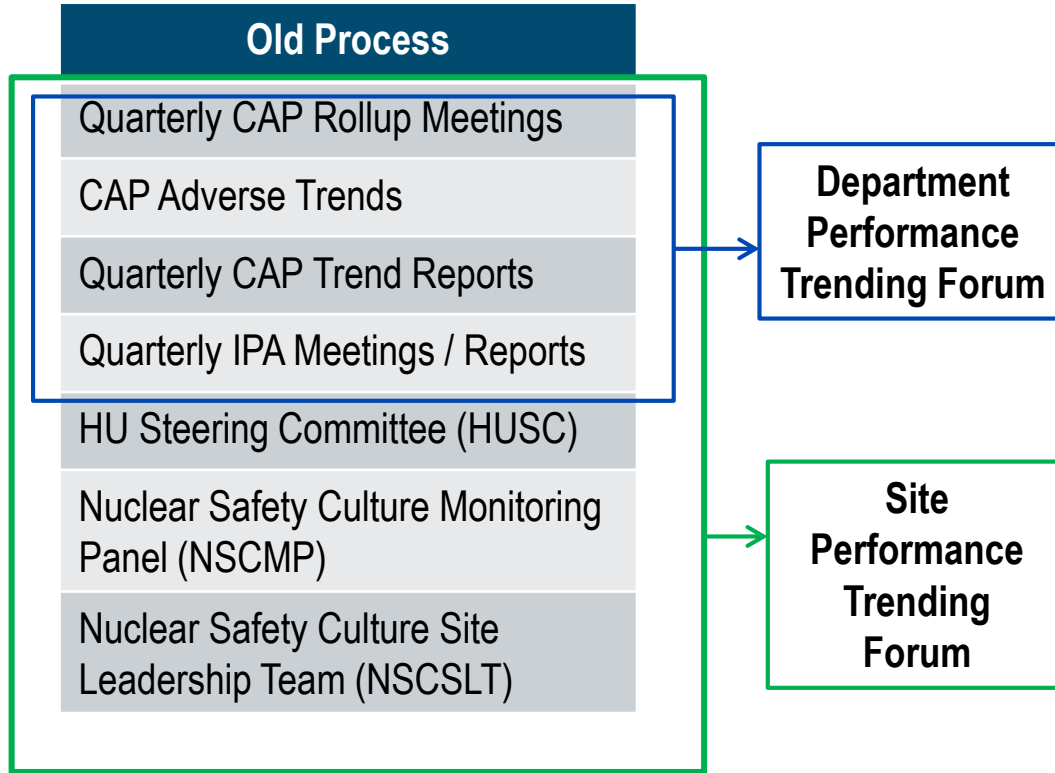


## New Process

	Information Use
NUCLEAR OPERATING FLEET ADMINISTRATIVE PROCEDURE	
AD-PI-ALL-0200	
PERFORMANCE TRENDING	



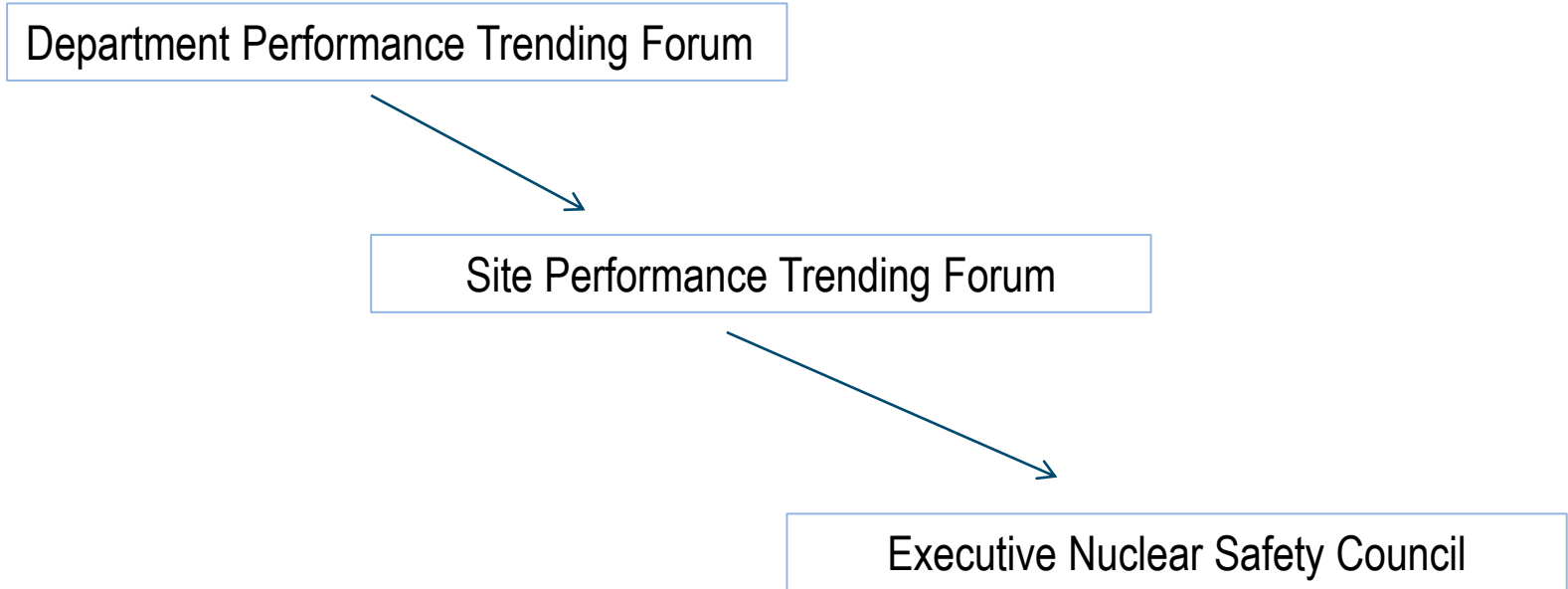
# Combining Process to Get a Full Picture



The Review Period is every four (4) months (Trimesters) January – April, May – August and September – December. Meetings and report approvals are to be completed by dates below

Review Period	Department (Meeting and Report Approval Complete)	Site (Meeting and Report Approval Complete)
1st Trimester	June 15th	July 31st
2nd Trimester	October 15th	November 30th
3rd Trimester	February 15th	March 31st

# Combining Process to Get a Full Picture



# Overall Monitoring of Nuclear Safety Culture

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- Executive Review Board
- ECP – escalation and effectiveness reviews
- Differing Professional Opinion Process
- Enterprise Employee Engagement Survey with SCWE Focus for Nuclear Generation
- Performance Trending, AD-PI-ALL-0200
- Mid-Cycles with Nuclear Safety Culture Assessments
- Executive Nuclear Safety Council



## **Key Points from the Industry Update on Safety Culture Monitoring Topic**

1. **Industry's use of safety culture information has evolved since the culture monitoring initiative was implemented in 2011** – Industry has matured in its understanding and use of safety culture information since NEI 09-07, “Fostering a Healthy Safety Culture,” was implemented in 2011. Today, licensee discussions of cultural implications of plant events are not confined to meetings of the NEI 09-07 Nuclear Safety Culture Monitoring Panel. Tagging of culturally significant Condition Reports, events and trends has fostered recognition and discussion of cultural implications in other management meetings as well.
2. **Industry is taking a variety of approaches to safety culture monitoring** – The industry presentation about the Duke approach illustrates one of the more advanced efforts to integrate safety culture monitoring into the licensee's web of quarterly performance improvement and oversight meetings. On the other end of the spectrum, Exelon's current approach is much closer to the original safety culture monitoring process presented in NEI 09-07, Revision 0, with a dedicated panel meeting periodically. This range of approaches was a key change offered in NEI 09-07, Revision 1, and was intended to allow utilities to find less burdensome and company-tailored ways to achieve the desired results.
3. **NRC is concerned about industry eliminating the NEI 09-07 process** – The staff expressed concern that the monitoring process might be eliminated altogether. Mr. Sanfilippo reiterated that the NRC might want to revisit the changes made in the Cross-Cutting Issue process if industry eliminates culture monitoring. He said part of the staff's rationale for raising the thresholds for declaring a cross-cutting theme and the minimum time that theme must endure to be called a Cross-Cutting Issue was the existence of the industry's safety culture monitoring process. Ms. Keefe-Forsyth expressed general concern that industry appears to be on course to eliminate the 09-07 process in the near future. Industry indicated that any such decision would occur no sooner than 2017, allowing plenty of time and opportunities for further discussion with NRC. Asked how NRC uses information from our monitoring process, Ms. Keefe-Forsyth said that NRC looks at it primarily when performing IP 95003, “Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Input, or One Red Input.” She said the staff wants to see the types of information the monitoring process examines, what the panelists discuss, and what results come from their discussions. Ms. Sieracki added that the monitoring process is important to NRC for confidence that industry is maintaining an ongoing sense of the culture between biennial culture assessments (surveys, interviews, etc.).
4. **NRC asked about the training given to culture monitoring panelists** – Ms. Willis asked what training Duke gives its performance improvement and management oversight meeting participants that would ensure their effectiveness in dealing with cultural issues. Ms. Hayes talked about the review of safety culture traits and other training given to the variety of participants.
5. **Prelude to further discussions** – NEI agreed to return to brief the staff again as industry proceeds with its evaluation of the DNP recommendation to eliminate the NEI 09-07 process. This will allow time to gather more information from industry and to talk further about the staff's questions and concerns. NEI agreed to return later this year or early next year to continue this conversation.

# **IMC 308 Attachment 3, Appendix M Draft Technical Basis Document**

**ROP Working Group  
Public Meeting**

**September 21, 2016**

# Objectives

- Provide a technical basis for a non-quantitative Significance Determination Process (SDP).
- Provide the basis for each entry condition in the appropriate use of IMC 609 Appendix M.
- Provide the set of decision attributes and associated criteria for each decision attribute for SDP decision making.
- Provide guidance for establishing the importance of each decision attribute in making a final integrated risk-informed decision.

# Importance Assessment of Decision Attribute

- Definitions of Importance

- Low importance ~ impact is minor and limited due to existing controls and/or processes
- Medium importance ~ impact is moderate, but not severe enough to prevent SSC from performing its intended function
- High importance ~ impact is significant that SSC fails to perform its intended function



# Assessment of Decision Attribute ~ Number of Affected Criteria

- Low Importance
  - Remains Low Importance when only one criterion is affected
  - Elevated to Medium Importance if two or three criteria are affected
  - Elevated to High Importance if more than three criteria are affected
- Medium Importance
  - Remains Medium Importance when only one criterion is affected
  - Elevated to High Importance if two or more criteria are affected
- High Importance
  - Remains High Importance when only one criterion is affected
  - Significant programmatic weaknesses if two or more criteria are affected

# Guidance for Integration of Applicable Decision Attributes

- If all Decision Attributes are not applicable, the final significance color should be Green
- If one or two decision attributes are of Low importance, the final significance of the finding should remain the same as the preliminary significance color
- If one decision attribute is of Medium importance, the final significance of the finding should remain the same as the preliminary significance color

# Guidance for Integration of Applicable Decision Attributes (Continued)

- If one decision attribute is of Medium importance and another is of Low importance, the final significance of the finding should remain the same as the preliminary significance color
- If two decision attributes are of Medium importance, the final significance of the finding may be changed to a higher significance (i.e., from white to yellow)
- If one or more attributes is of high importance, the final significance of the finding may be changed to a higher significance (i.e., from white to yellow).
- When changing significance, the color of the upper bound of the initial bounding assessment is not to be exceeded

# **IMC 0609 Appendix M Revision ~ Update**

See-Meng Wong, NRR/DRA  
Zack Hollcraft, NRR/DIRS  
Brandon Hartle, NRR/DRA

# Purpose

- Continue interactions with all stakeholders
- Provide update on IMC 609 Appendix M revision
  - An overview of draft IMC 308 Attachment 3, Appendix M, Technical Basis document (ML16251A037)
- Receive external stakeholder comments

# Desired Outcomes

- Feedback from external stakeholders on draft IMC 609 Appendix M (ML16188A010)
  - Entry Conditions
  - Key decision attributes
  - Assessment of each Decision Attribute
  - Integrated assessment of applicable Decision Attributes
- Plans for additional public meetings and “tabletop exercise” workshops