

RUG III Update

Delivering the Nuclear Promise
Corrective Action Program
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NEI Efficiency Bulletin 16-10 - CAP-001

- Reducing Cumulative Impact from Corrective Action Program
- Issued in March, 2016
- Blue Bulletin – up to CNOs to determine implementation
- Key Message – Implement INPO 14-004, Conduct of Performance Improvement
- Value Proposition: Station leaders and workers spend less time processing issue evaluations and corrective actions, including time spent in committee meetings, and have greater focus on conditions adverse to quality and other items of significance.

Specific Actions

- Minimize use of the CAP to address low-level conditions that are not adverse to quality
- Maximize the use of other management processes
- Reduce number investigations, complexity, people involved, length of reports
- Reduce the management oversight of CAP – reduce the number of products, length of reports, etc.

Delivering the Nuclear Promise – CAP-002

- Corrective Action Program Enhancements for Improving Safety and Efficiency
- Efficiencies can be gained by reducing the CAP footprint
- NEI 16-07 document in DRAFT has been presented to industry for review and comment. This document establishes industry standards and definitions for CAP.
- NEI 16-07 document and NEI Efficiency Bulletin will be issued in January, 2017 as a RED Bulletin
- Seeking NRC Endorsement

What Will Be Different

- Population of items in CAP clearly defined
- Significant Conditions Adverse to Quality (Serious effect on Safety)
- Conditions Adverse to Quality (Appendix B)
- Conditions Adverse to the ROP (Other Regulatory Compliance)
- Most CAQ and Adverse to ROP addressed at “Find and Fix” level
- Industry standard templates for limited investigations for equipment, Human Performance, Organizational

What Will Not Be Different

- Support and encouragement for low threshold reporting
- Equipment and regulatory significant issues still included in CAP
- Conditions Adverse to Quality must still be identified and corrected
- Significant Conditions Adverse to Quality must still be identified, have the cause determined, and have actions to preclude repetition

Condition Affecting Regulatory Compliance

- Reactor Oversight Process Related issues – an undesired condition affecting one or more of the strategic performance areas and associated cornerstones defined in the NRC's Reactor Oversight Process. Also included in this category is any violation subject to NRC traditional enforcement and non-compliance with docketed commitment made to the NRC.
- For MOST of these conditions: cause determination is not required. Action is assigned to correct the issue.
- For issues that screen as a White, Yellow, or Red Finding: assessment performed to identify root and contributing causes, extent of condition, extent of cause (IP 9500X series)

Path Forward

- Begin public engagement on proposed CAP process and changes in July/August of 2016
- Discuss potential for requesting changes to NRC inspection procedures
- Seeking NRC endorsement of industry guidance document in Q1-2017
- Provide licensees with regulatory certainty
- Industry-wide implementation in 2017

Examples

- Condition affecting performance in initiating events, mitigating systems, or barrier integrity such as
 - Fire Protection
 - Flood Protection
 - In-service inspection activities
 - Licensed operator requalification program
 - Beyond design basis event response capability (FLEX, B.5.b, SAMG)
- Condition affecting performance in the Emergency Preparedness program
- Condition affecting performance in the Radiation Protection program
- Controls on radiation areas or radioactive material
- Radiation Monitoring instrumentation
- Condition affecting the performance of the Security program
 - Loggable / reportable safeguards event
 - Loggable / reportable Fitness for Duty event
 - Weapons or ammunition storage issue

Questions?