

# Protecting People and the Environment

Action Plan
Risk-Informed Decision-Making
Operating Reactor Business Line

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- August 11, 2017 (ML17219A346). Initial issuance.
- August 31, 2017 (ML17219A346). Incorporates feedback and editorial changes.
- October 17, 2017 (ML17290A155). New title to reflect scope expansion to the operating reactor business line; adds new tasks – NRR Tasks 7, 8, and 9 – derived from the NRR Office Director's memorandum dated June 29, 2017 (ML17180A061) and subsequent ET/LT meeting discussions.
- January 23, 2018 (ML18005A911). Reformatted action plan to include strategic framework (process) for completing the NRR RIDM project; finalized the eight NRR RIDM tasks.
- May 4, 2018 (ML18116A023). Incorporates details on the risk-informed initiatives and impact of preliminary NRC Transformation Team activities; provides details on Phase 2 and the pilot program; provides update on the action plan schedule, including milestones and metric to complete Phase 1; provides preliminary results of the Task 2 cafés with staff and managers and online questionnaire.
- August 14, 2018 (ML18211A439). Updated to reflect the end of Phase 1 and the start of Phase 2. Added recommendations from Phase 1, new organizational structure, and Phase 2 Implementation Plan.

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## 1.0 BACKGROUND

On May 11, 2017, the U.S. Nuclear Regulatory Commission (NRC, the Commission) was briefed on risk-informed regulatory activities by nuclear industry representatives and the NRC staff. The briefing included a status of the NRC's and industry's risk-informed initiatives and an overview of successes and areas of focus for advancing risk-informed regulation.

On June 12, 2017, the Office of Nuclear Reactor Regulation (NRR) senior leadership met to discuss how NRR should enhance how it integrates risk into its decision-making procedures and processes and increase the staff's understanding of risk and risk tools. NRR senior leadership developed a mission statement, supporting objectives, and tasks that the staff should complete to enhance the integration of risk into our decision making procedures and processes.

On June 26, 2017, the Commission issued staff requirements memorandum (SRM)-M170511 (Reference 1) in response to the May 11, 2017 meeting and directed the staff to provide the Commission with an information paper discussing its plans for increasing staff capabilities to use risk information in decision-making activities.

On June 29, 2017, the Director of NRR issued a memorandum to NRR management (Reference 2) to summarize the June 12, 2017 meeting and task them to continue the development and inclusion of risk considerations in licensing reviews. In addition, this memorandum tasked NRR management with actions to disposition related recommendations from a differing professional opinion (DPO) panel review (References 3, 4, and 5) regarding two emergency license amendments issued on December 23, 2016 (Reference 6), and January 4, 2017 (Reference 7), for Palo Verde Nuclear Generating Station (Palo Verde), Unit 3, involving diesel generator allowed outage times (AOTs).

The staff responded to SRM-M170511 by SECY-17-0112 on November 13, 2017 (Reference 8), which provided the staff's proposal for increasing its capability to use risk information in decision making and described challenges towards further progress in risk informed decision-making (RIDM) and measures that the staff is taking to overcome these challenges.

Separately, by memorandum dated January 25, 2018 (Reference 9), the NRC's Executive Director for Operations (EDO) tasked the staff (i.e., the Transformation Team) to identify potential transformation(s) to the NRC's regulatory framework, culture, and infrastructure. This Transformation Team received internal and external stakeholder feedback on the need for consistent and expanded use of RIDM. Specifically, the Transformation Team received feedback from stakeholders on the need for a systematic, consistent approach to utilizing RIDM in licensing to scale the breadth and depth of review and more fully leverage existing internal and external information.

This NRR RIDM action plan implements the staff's proposal contained in SECY-17-0112 and the tasks outlined in the June 29, 2017, NRR director memorandum. Additionally, the RIDM action plan has been revised to reference the feedback received by the Transformation Team. This action plan is a living document and will be updated quarterly or as needed. The NRC staff used LIC-502, Revision 3, "Procedure for Development, Implementation, and Management of Action Plans," dated March 23, 2017 (Reference 10), with variations to create this action plan. The NRR RIDM team is additionally available to support other NRC office activities to enhance RIDM in their programs.

#### 2.0 NRR RIDM TEAM

SECY-17-0112 states that it focuses on RIDM for the reactor program (i.e., operating and new reactors); however, it also discusses next generation advanced non-light water reactor developers, which are increasingly using probabilistic risk assessment throughout the design process. Recognizing that successful execution of these RIDM strategies should benefit both current and future licensees, the Risk-Informed Steering Committee (RISC), which includes senior leader representatives from across the agency, may be engaged to disseminate NRR findings and practices to other offices/regions. Thus, though the current focus of this action plan is specific to NRR, ideas and strategies from the NRR RIDM project may feed into agency-wide programs via the RISC.

The NRR RIDM team includes staff from the Office of New Reactors (NRO) for awareness and to provide NRO insights on their experiences using RIDM, as well as looking forward to the NRR/NRO merger. The NRR RIDM team is also available to support other NRC office/regional activities. This action plan has been shared with other offices/regions with the intent to support their efforts to enhance RIDM within their programs, which may include using this action plan as a model to develop a plan that addresses their specific office needs. During Phase 2, staff will brief regional management on the NRR RIDM effort to further raise the visibility of the initiative. In keeping with the NRC Transformation effort, an agency-wide RIDM effort may be pursued, independent of but informed by the NRR RIDM Action Plan.

Figure 1 provides an overview of the RIDM team. The team's Executive Sponsor is the NRR Deputy Director for Engineering. There are four Senior Executive Service (SES) Champions from the Division of Operating Reactor Licensing (DORL), Division of Risk Assessment (DRA), Division of Safety Systems (DSS) and Division of Engineering (DE). Each SES Champion provides oversight on the direction of their assigned team(s).

## 2.1 <u>Project Management Structure</u>

Below is a description of the roles and responsibilities of each of the positions of the NRR RIDM team.

- Executive Sponsor: Provides policy direction on the NRR RIDM project.
- **SES Champions:** Provide oversight of their task(s) and ensures that the working groups implement the policy direction received from the Executive Sponsor. DORL is the NRR RIDM project management lead, and DRA is the NRR RIDM technical lead.
- Lead RIDM Project Manager: The lead DORL RIDM project manager is responsible for generating and implementing the process as defined in this action plan. The project manager will attend the working group meetings to ensure the continuity of the project and address any process-related questions or questions interrelated to another working group's task. In addition, the project manager will update the action plan, as needed, provide updates to the SES Champions (or any issues requiring their attention) during their biweekly meetings, and assist with communicating policy direction received from the Executive Sponsor to the working groups.
- Working Group Team Leads: Each working group is assigned a team lead, who
  serves as the main point of contact for the working group. The team lead is responsible
  for facilitating the working group meetings, updating their SES Champion, and
  coordinating the action items assigned by the lead RIDM project manager.

- Working Group Branch Chief Advisors: Each working group is assigned a Branch Chief Advisor, who provides guidance to the Team Leads as needed to assist in the accomplishment of action items.
- **Working Groups:** The working groups are responsible for the management and review of their assigned task.

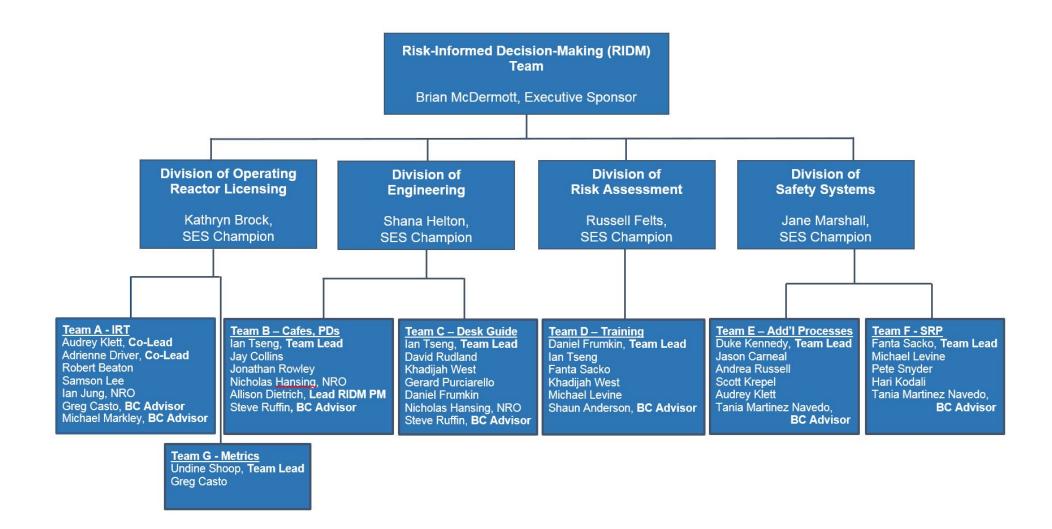


Figure 1: RIDM Team

## 3.0 NRR RIDM PROJECT PROCESS

SECY-17-0112 identified challenges that inhibit further progress in RIDM. For example, it stated that some NRC staff are not as familiar or experienced with the use of RIDM and the benefits it can bring to the overall regulatory approach. Overcoming this overarching change-management challenge and culture change is essential to making progress in RIDM. To mitigate this overarching challenge, this action plan utilizes a systematic or phased approach which involves engaging with staff to generate and implement recommendations to enhance the use of risk insights in our decision-making activities. The staff believes that utilizing this approach will ensure the successful achievement of the NRR RIDM project mission statement and support the cultural transition from the current processes in place. As with any cultural change, there are questions that arise on why a change is being made and the proper documentation is necessary to justify the proposed changes. Therefore, the action plan's phased approach also includes actions to document and communicate the team's progress, to ensure a more complete understanding by the staff of the benefits achieved by these changes.

This action plan implements two phases. Phase 1 was the evaluation and analysis of the tasks to generate findings and recommendations reports; Phase 2 is implementation of the recommendations.

#### 3.1 Phase 1: Evaluation and Analysis to Generate Recommendations

Phase 1 was the evaluation and analysis phase to support the working groups' findings and recommendations reports. At the completion of Phase 1 in June 2018, the NRR RIDM team published a findings and recommendations report (Reference 11). This report summarized the findings from the information collected and analyzed to justify the proposed revisions to guidance documents and training programs (i.e., recommendations). The recommendations were briefed to the ET/LT at the completion of Phase 1. The Phase 1 recommendations are presented in Table 1.

TABLE 1: SUMMARY OF NRR RIDM PHASE 1 RECOMMENDATIONS

NRR RIDM Tasks 1 and 3 Recommendations						
Recommendation 1	For the purposes of implementing an integrated review team (IRT) approach, Type 1, 2, and 3 applications should be defined based on the level of probabilistic risk assessment information in licensees' submittals.					
Recommendation 2	Implement the IRT roles and responsibilities on a trial basis from July through October 2018.					
Recommendation 3	Implement the IRT processes on a trial basis from July through October 2018.					
Recommendation 4	After a trial implementation period from July through October 2018, staff will assess feedback and adjust the roles, responsibilities, and processes prior to updating office instructions (OIs), guidance, and training, which will be accomplished via the NRR ticketing process. The ticketing to update guidance, OIs, and training will be created by December 31, 2018.					
Recommendation 5	After a trial implementation period of the IRT process, implement permanent RRPS changes, as modified based on feedback during the trial implementation period, via ticketing. The ticketing to update RRPS will be created by December 31, 2018.					
Recommendation 6	By November 30, 2018, NRR divisions should determine whether their processes that were not covered within the IRT trial basis could be enhanced using the IRT approach or a similar process and develop separate plans for updating those processes, if applicable. If NRR divisions determine that their processes should be enhanced, NRR will create tickets by December 31, 2018, to update those processes.					
	NRR RIDM Task 2 Recommendations					
Recommendation 1	Establish NUREG-2122, "Glossary of Risk-Related Terms in Support of Risk-Informed Decision-making," as the main glossary for risk-related terms so that there is one authoritative source.					
Recommendation 2	Recognizing that the five principles in Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis" (Reference 12), are well known, develop guidance for use of other principles that are important to RIDM.					
Recommendation 3	Develop a desktop glossary of terms and make available as a quick reference guide for more commonly used RIDM terms.					
Recommendation 4	Enhance the current review guidance and office procedures to place greater emphasis on using risk insights.					
Recommendation 5	Develop guidance (e.g., office instruction) that identifies the hierarchy of RIDM documents, provides a roadmap on which RIDM documents to use, and complements current regulatory approaches, as appropriate.					
Recommendation 6	Develop training for staff to facilitate using risk insights for reviews that do not require probabilistic risk assessment.					

Recommendation 7	Augment position descriptions and performance appraisal elements and standards to include the use of risk information and risk insights to enhance decision-making.					
NRR RIDM Task 4 Recommendations						
Recommendation 1	Provide training to staff on the expectations memorandum, "Current Expectations for Using Existing Guidance for Reviewing License Amendment Requests for Diesel Generator Technical Specification Completion Time Extensions."					
Recommendation 2	Implement the revisions to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (SRP) Branch Technical Position (BTP) 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources AOT Extensions" (Reference 13).					
Recommendation 3	Revise SRP Section 16.1, "Risk-Informed Decision-making: Technical Specifications," to include key points of the expectation memorandum, and to reference the current version of RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications" (Reference 14).					
Recommendation 4	Revise RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," to address (1) long-duration completion times for one-time extensions and (2) backstop completion times.					
Recommendation 5	All NRR staff should have risk-informed application training, training on RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" (Reference 15), RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," and associated refresher training on integrated reviews every 24 months.					
Recommendation 6	All NRR staff should have training on how to review/disposition license amendment requests with risk insights.					

## 3.2 Phase 2: Implementation of the Recommendations

Phase 2 is defined as the implementation phase of the NRR RIDM project. This phase will implement the working groups' recommendations from Phase 1. The Phase 2 Implementation Plan is illustrated in Figure 2.

The Phase 2 Implementation Plan was generated by combining the 19 recommendations from Phase 1 into 13 Implementation Items. For example, Task 2 and Task 4 both produced recommendations to conduct training. For Phase 2, these recommendations were divided into Implementation Item Number 6, for high-level training, and Implementation Item Number 7, for branch-specific training. Each Implementation Item was then assigned to a team. Teams are identified by letters A through G. Section 4.0 of this Action Plan details the scope of work and the responsibilities of each team.

## **RIDM Phase II**

					ACTIONS		TRAINING		GUIDANCE		
Phase I Task	Phase I Recommendation	Description	New Item#	Team	July	August	September	October	November	December	BEYOND PHASE II
Task 1/3	1	Define Type 1, 2 & 3 applications	1	А	DEFINE TYPES I, II, III						
Task 1/3	2/3/4	IRT roles & responsibilities trial basis, obtain feedback and assess	2	А		IRT TRIAL BASIS			►→ 5, 7, 9, 10, 11 EVALUATE FEEDBACK		
Task 2	7	Augment position descriptions and performance appraisal elements and standards	3	В	DRAFT LANGUAGE - POSITI	ON DESCRIPTIONS AND PER	RFORMANCE ELEMENTS			TICKET FOR 2020	
Task 2		Regional Cafes	4	В			REGIONAL CAFÉS		ANALYZE CAFÉ RESULTS	ASSESS REGIONAL CAFÉ RESULTS' IMPACT ON F GUIDANCE/TRAINING	→ 5, 7, 9, 10, 11
Task 1/3	4	Training on IRT	5	Α						TICKET IRT TRAINING	CONDUCT IRT TRAINING
Task 2/2/4/4/4	1/6/1/5/6	Training on RG 1.174, RG, 1.200, RG 1.177, NUREG 2122, risk insights, expectation memo	6	D		DEVELOP HIGH LEVEL TRAINING (ALL STAFF)			TICKET HIGH LEVEL TRAINING	CONDUCT HIGH LEVEL TRAINING (ALL STAFF)	
Task 2/2/4/4/4	1/6/1/5/6	Training on RG 1.174, RG, 1.200, RG 1.177, NUREG 2122, risk insights, expectation memo	7	D		DEVELOP BRANCH SPECIFIC TRAINING (TECHNICAL REVIEWERS)  UPDATE BRANCH TRAINING BASED ON IRT  14 TRIAL FEEDBACK		TICKET BRANCH SPECIFIC TRAINING	CONDUCT BRANCH SPECIFIC TRAINING		
Task 2	2/3/5	Guidance for use of risk principles, desktop glossary, hierarchy of documents	8	C			DEVELOP DESKTOP GLOSS	ARY & GUIDANCE		FINALIZE GLOSSARY & GUIDANCE	
Task (1/3)/(1/3)/2	1/4/4	Update Ols to reflect Type 1, 2, 3 applications and IRT roles/responsibilities/process	9	Α					IDENTIFY OIS TO UPDATE	TICKET OI UPDATES	UPDATE OIs FOR IRT
Task 1/3	5	Update RRPS to reflect IRT	10	Α					IDENTIFY RRPS CHANGES 2,4 FOR IRT	SUBMIT REQUESTS FOR RRPS CHANGES TO CCB	UPDATE RRPS FOR IRT
Task 1/3	6	Identify other processes that could use IRTs. Update Ols, guidance, training for other processes	11	Е	IDENTIFY OTHER PROCESSES FOR IRT  IDENTIFY OIS TO UPDATE 2.4 (OTHER PROCESSES)		TICKET OI UPDATES (OTHER PROCESSES)	UPDATE OIS FOR IRT (OTHER PROCESSES)			
Task 4	2/3/4	Revise BTP 8-8, SRP 16.1, RG 1.177	12	F	IDENTIFY RESOURCES & ASSIGN RESPONSIBILITIES  TICKET DOCUMENT UPDATES			UPDATE DOCUMENTS			
	WI	Update Metrics	13	G	50.69 METRICS	SAFETY STRATEGY 2 METRICS			FINALIZE RIDM METRICS		

Figure 2: RIDM Phase 2 Implementation Plan

#### 4.0 NRR RIDM SCOPE OF WORK

This project is currently in Phase 2. Sections 4.1 through 4.7 of this action plan provide the responsibilities of each Phase 2 team, and the scope of NRR RIDM Phase 2 Implementation Items.

#### 4.1 NRR RIDM Team A

The NRR RIDM Team A will be responsible for Implementation Items 1, 2, 5, 9, and 10, which are related to the IRT approach to processing licensing actions. These Implementation Items were generated from Tasks 1 and 3, Recommendations 1 through 5, and Task 2, Recommendation 4.

Team A will identify candidate licensing actions and will implement the IRT process during the trial period which will last through October 2018. Team A will solicit feedback on the process via survey throughout the trial period. In November 2018, Team A will evaluate the survey results and develop procedural changes to the IRT process based on feedback. Team A will then identify NRR OIs that need to be revised to reflect the new process. Team A will identify any RRPS functional needs, and will request changes through the Configuration Control Board. Team A will also identify training needs, such as ADM 504 changes, formal training classes, and iLearn presentations. By December 31, 2018, Team A will ticket the updates to training, updates to OIs, and updates to RRPS related to the IRT process.

## 4.2 NRR RIDM Team B

The NRR RIDM Team B will be responsible for Implementation Items 3 and 4. Item 3 was generated from Task 2, Recommendation 7, which recommended augmenting position descriptions and performance appraisal elements and standards to include the use of risk information and risk insights to enhance decision-making. Item 4 is a follow-up to the risk cafes that were held at NRC headquarters during Phase 1. The purpose of Item 4 is to conduct similar risk cafes in the NRC Regional offices, and to assess the café results and evaluate their impact on guidance and training updates.

Team B will draft position descriptions and updates to performance appraisal elements by September 2018. By December 31, 2018, Team B will issue a ticket to update NRR position descriptions and performance appraisal elements for FY 2020. Regional risk cafes will be held between August and October 2018. In November 2018, Team B will evaluate the results of the cafes and assess their impact on the guidance and training updates coming out of the NRR RIDM project. Team B will share this information with the NRR RIDM teams that are responsible for training and guidance revisions.

#### 4.3 NRR RIDM Team C

The NRR RIDM Team C will be responsible for Implementation Item 8. Item 8 was generated from Task 2, Recommendations 2, 3, and 5, which recommended the production of guidance for the use of risk principles in licensing reviews, the development of a desktop glossary of risk-related terms, and guidance regarding the hierarchy of RIDM documents. Team C will develop this guidance between August and November 2018. By December 31, 2018, Team C will finalize and publish the new guidance.

#### 4.4 NRR RIDM Team D

The NRR RIDM Team D will be responsible for Implementation Items 6 and 7. Items 6 and 7 were generated from Task 2, Recommendations 1 and 6, and Task 4, Recommendations 1, 5, and 6, which recommended creating and providing training to the NRC staff. This training will cover risk-related regulatory guides and NUREGs, and will facilitate using risk insights for reviews that do not require probabilistic risk assessment. The training developed by Team D will be broken into two categories: high-level training that will be common to all NRR staff, and branch-specific training for technical staff that will address their specific roles in dispositioning licensing actions that contain risk insights. By December 31, 2018, Team D will have developed the training, and will ticket the delivery of the training to NRR staff.

## 4.5 NRR RIDM Team E

The NRR RIDM Team E will be responsible for Implementation Item 11. Item 11 was generated from Tasks 1 and 3, Recommendation 6. Team E will determine whether processes other than licensing actions could be enhanced using the IRT approach or a similar approach using risk insights. This may include processes such as license renewals, power uprates, and the generic Technical Specification Task Force process. Team E will develop plans for updating those processes, if applicable. By December 31, 2018, Team E will ticket the updates to the affected Ols, training, and/or guidance.

#### 4.6 NRR RIDM Team F

The NRR RIDM Team F will be responsible for Implementation Item 12. Item 12 was generated from Task 4, Recommendations 2, 3, and 4. Team F will revise the Standard Review Plan (SRP) Branch Technical Position (BTP) 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources AOT Extensions," SRP Section 16.1, "Risk-Informed Decision-making: Technical Specification," and RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specification." By December 31, 2018, Team F will ticket the revisions to the applicable documents.

#### 4.7 NRR RIDM Team G

The NRR RIDM Team G will be responsible for Implementation Item 13. Item 13 was generated from a meeting with the Office of the Executive Director for Operations. In this meeting, the staff was encouraged to develop metrics in order to measure the implementation of the recommendations, as well as be transparent in holding the staff and organization accountable for supporting the culture change related to risk informed decision making. Team G will develop and finalize RIDM metrics by December 31, 2018.

#### 5.0 COMMUNICATION PLAN

## 5.1 Key Messages

- The action plan includes a strategic framework (i.e., process) for completing the NRR RIDM project.
- The action plan is considered a living document and will be updated, as needed, to reflect changes to the process or changes to the NRR RIDM tasks.

- The RIDM framework incorporates the five strategies from SECY-17-0112 in response to the June 26, 2017, SRM (Reference 1). The five strategies are (1) evaluate and update guidance, (2) develop a graded approach, (3) enhance mandatory training, (4) advance risk-informed initiatives, and (5) enhance communication.
- The RIDM project uses a phased approach to complete the tasks. Phase 1 included collecting data, and evaluation and analysis of the data for each working group to generate a recommendations report. Phase 2 is the implementation of the recommendations from the working group reports.
- Phase 1 of the project resulted in 19 recommendations. For Phase 2, those 19 recommendations were condensed into 13 Implementation Items that have been assigned to 7 different Teams.
- The working groups are currently completing Phase 2. Phase 2 includes a trial basis for an IRT process for licensing actions, as well as the revision of guidance and the development of training.
- By December 31<sup>st</sup>, all actions for Phase 2 will be completed. Controlled Correspondence will be used to track any long-term follow-up actions that will take place beyond Phase 2.

## 5.2 Audience and Stakeholders

#### 5.2.1 Internal Stakeholders

Internal stakeholders include the Commission, Office of the Executive Director for Operations (OEDO), Office of the General Counsel (OGC), NRR, RES, NRO, Office of Nuclear Material Safety and Safeguards (NMSS), Office of Nuclear Security and Incident Response (NSIR), Office of Public Affairs (OPA), Office of Congressional Affairs (OCA), Region I, Region II, Region IV, and Office of Inspector General (OIG).

#### 5.2.2 External Stakeholders

External stakeholders include the public, licensees, Nuclear Energy Institute (NEI)/industry, public interest groups, the media, and Congress.

#### 5.3 Communication Tools

Below are the communication tools that the staff may utilize to keep internal and external stakeholders informed on the progress of this project. In addition, the internal tools will be used to (1) collect data to identify gaps in the staff's understanding of the agency's use of risk and (2) train the staff on the proposed revisions to guidance documents and training programs.

#### 5.3.1 Internal Communication Tools

Action Plan: Provides the strategic framework or process for completing the

> NRR RIDM project. Since the action plan is a publicly available document, it will also be used as an external communication tool.

Internal

Briefings, emails, etc. will be provided to headquarters and regional Communications: management and/or staff (as well as the Commission), as required,

to provide updates on the progress of the NRR RIDM project and help prepare internal stakeholders to communicate to external stakeholders. At the completion of Phase 1, the Findings and Recommendations report was briefed to the NRR Executive Team and the Deputy Executive Director for Reactor and Preparedness Programs. A Commissioner's Assistant Briefing is planned for the

fall of 2018.

Focused Interviews/ Questionnaires:

Interview staff with experience in processing risk-informed licensing actions to gain a broad understanding on how the staff uses risk in their decision-making activities. In addition, questionnaires are used to identify the staff's understanding of the agency's use of risk and to enhance or clarify guidance documents and/or training programs.

Workshops/Cafés:

This action plan will leverage the paradigm from the Risk Informed Thinking workshops to communicate to the staff proposed changes made under this project. Also, the cafés will be used to gain a broad spectrum of the staff's (technical reviewers and risk analysts) understanding on how risk is used in the agency's decision-making activities. During Phase 1, cafes were held at NRC headquarters. During Phase 2, cafes will be held in the Regional Offices.

NRR Announcements:

Used to announce the questionnaires and cafés.

**Division Meetings:** 

Provide updates on the progress of this project and training during NRR division meetings.

**Regional Counterpart** 

Meetings:

Provide updates on the progress of this project and training during the regional counterpart meetings. During Phase 2, the RIDM team will brief the Regional Administrators on the results of Phase 1 and the plan for Phase 2.

Findings and Recommendations Reports:

At the conclusion of Phase 1 of the project, the RIDM team produced a findings and recommendations report to identify proposed changes to the agency's current processes to enhance risk in our decision-making activities, including revisions to guidance documents and training programs. This report is publicly available, and can also be used as an external communication tool.

NRR Controlled **Correspondence:** 

Controlled correspondence (i.e., yellow tickets) will be used to track the implementation of the approved recommendations in the

findings and recommendations reports.

#### 5.3.2 External Communication Tools

**Action Plan**: Provides the strategic framework or process for completing the NRR

RIDM project.

**Public Meetings**: A Category II Public Meeting will be held during Phase 2. At the

public meeting, RIDM Team will provide an update to the industry on the RIDM Action Plan Phase I Recommendations. The team will also notify industry of the new IRT licensing process, currently effective in trial basis. The team will explain Type I, II, III

applications, and obtain industry feedback.

The NRR RIDM project may utilize the quarterly Risk-Informed Steering Committee (RISC) public meetings to update licensees, NEI, and members of the public on the status of the project. Since the RISC public meetings are typically attended by NRC and licensee executives, independent staff level public meetings will be

scheduled, as needed, to discuss working level items.

Findings and Recommendations Reports:

At the conclusion of Phase 1 of the project, the RIDM team produced a findings and recommendations report to identify proposed changes to the agency's current processes to enhance risk in our decision-making activities, including revisions to guidance

documents and training programs.

## 6.0 PROJECT'S SUCCESS CRITERIA

As noted in SECY-17-0112, significant progress has been made in RIDM, but cultural, process, and technical challenges remain. For example, current reviews that attempted to adopt concepts from the NRR RIDM tasks in this action plan involved significant resources due to process challenges because, in part, review methodology guidelines for integrating risk and traditional engineering insights were not available, and activities under this project to foster a common understanding of the concepts of risk, defense-in-depth, safety margins, etc., are still ongoing. Therefore, the successful completion of this project is intended to address the challenges identified in SECY-17-0112.

Upon implementing the RIDM project recommendations, NRR will complete a review to measure the success of the process changes. This review will include a comparison of the average hours and duration spent on past reviews. This information will be used to determine if the hours spent and duration to complete a review is increasing, decreasing, or remaining the same. Licensing actions will continue to follow the current metric to complete 95 percent of licensing actions within 1 year and complete 100 percent of licensing actions within 2 years. However, consideration will be given to NRR RIDM-specific metrics.

## 7.0 CONTROL PROCESS

The NRR RIDM team recognizes that as this project progresses, there may be instances where tasks need to be revised or additional tasks added to this action plan. If a working group identifies a need to revise or add a task to this action plan, the working group team lead will communicate the revision to their assigned SES Champion and the lead RIDM project manager. The SES Champion and the lead RIDM project manager will communicate the proposed change to the SES Champions to discuss during their biweekly meeting. Once a decision is made by the SES Champions, the lead RIDM project manager will provide a summary on the outcome of the biweekly meeting to the working group team leads and update the action plan, as needed.

## 8.0 CONTACT

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