



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
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January 28, 2019

MEMORANDUM TO: Timothy J. McGinty, Director
Division of Construction Inspection
and Operational Programs
Office of New Reactors

FROM: Victor Hall, Branch Chief **/RA/**
Construction Inspection Program Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

SUBJECT: CONSTRUCTION REACTOR OVERSIGHT PROCESS
PERFORMANCE METRIC REPORT FOR CALENDAR
YEAR 2018

The Construction Reactor Oversight Process (cROP) self-assessment program evaluates the effectiveness of the cROP through its success in meeting pre-established goals and intended outcomes. The staff evaluates performance metrics to determine the success of the cROP in meeting these goals and outcomes. The staff performed the Calendar Year (CY) 2018 performance metric analysis in accordance with Inspection Manual Chapter (IMC) 2522, "Construction Reactor Oversight Process Self-Assessment Program," dated July 28, 2014, and IMC 2522 Appendix A, "Reactor Oversight Process Self-Assessment Metrics," dated October 4, 2017.

IMC 2522 and its associated appendix describe performance metrics associated with each of four cROP program areas: the inspection program (IP), significance determination process (SDP), assessment (AS) program, and inspection, test, analysis, and acceptance criteria program (ITA). The staff designates the program-specific metrics as the IP, SDP, AS, and ITA metrics, respectively. The staff also monitors and analyzes a metric of a more general nature, which is designated as the O metric, to assess the overall performance of the cROP. The staff uses the metric analyses as an input to the annual Commission paper on cROP self-assessment.

The results of the staff's CY 2018 analysis are enclosed. The staff found that the cROP successfully met 7 out of 8 applicable performance metrics by meeting the acceptance criteria defined in IMC 2522 Appendix A. The results of the staff's CY 2018 analyses are enclosed. Enclosure 1 provides a summary of the metric results and enclosure 2 provides the detailed report. Two metrics were deemed not applicable for the CY 2018 self-assessment. These

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metrics were related to significant events and timeliness of supplemental inspections. There were no significant events in CY 2018, and there were no supplemental inspections.

Enclosures:

1. Self-Assessment Metric Overview
2. Self-Assessment Metric Report

SUBJECT: CONSTRUCTION REACTOR OVERSIGHT PROCESS PERFORMANCE
METRIC REPORT FOR CALENDAR YEAR 2018 Dated: January 28, 2019

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Calendar Year 2018

cROP Self-Assessment Metric Report

(Enclosures 1 and 2)

SELF-ASSESSMENT METRIC OVERVIEW

INSPECTION PROGRAM METRICS

IP1: Inspection Reports are issued within Timeliness Requirements	IP2: NRC's Response to Technical Assistance Requests (TAR) Is Timely
Met	Not Met

SIGNIFICANCE DETERMINATION PROCESS METRICS

SDP1: SDP Results Are Predictable and Repeatable	SDP2: Appeals of SDP Results
Met	Met

ASSESSMENT PROGRAM METRICS

AS1: Deviations from the Construction Action Matrix	AS2: Assessment Program Results Are Completed in a Timely Manner	AS3: Timeliness of Supplemental Inspections	AS4: Degradations in Quality of Construction are Gradual and Allow Adequate Agency Engagement of the Licensee
Met	Met	N/A	Met

ITAAC METRIC

ITA1: Analysis of ITAAC Reopened After Closure Verification
Met

OVERALL cROP METRIC

O: Analysis of NRC's Responses to Significant Events
N/A

SELF-ASSESSMENT METRIC REPORT

INSPECTION MANUAL CHAPTER 2522 APPENDIX A CONSTRUCTION REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT METRICS

2522A-01 INSPECTION PROGRAM METRICS

IP-1 Inspection Reports are issued within Timeliness Requirements

Met: Yes

Definition: Audit 100% of reactor construction inspection reports issued during the calendar year in relation to the inspection report timeliness requirements in IMC 0613, "Power Reactor Construction Inspection Reports."

Acceptance Criteria: At least 90% of reactor construction inspection reports issued during the calendar year meet the inspection report timeliness requirements in IMC 0613.

Lead: NRO/DCIP (CIPB)

Goals Supported: Objective, Risk-Informed, Predictable, Effective, Open

NOTE: For inspections not conducted by a resident inspector, inspection completion is normally defined as the day of the final exit meeting. For resident inspector and integrated inspection reports, inspection completion is normally defined as the last day covered by the inspection report.

Analysis: All reactor construction inspection reports issued during CY 2018 met the timeliness requirements in IMC 0613.

IP-2	<u>NRC's Response to Technical Assistance Requests (TAR) Is Timely</u>
<u>Met:</u>	No
<u>Definition:</u>	Audit 100% of TARs completed in the calendar year in relation to the TAR timeliness requirements in NRO Office Instruction NRO-COM-108, "NRO Construction Inspection Interfaces with Region II."
<u>Acceptance Criteria:</u>	At least 90% of TARs are closed during the calendar year by the due date agreed upon by the requester within TAR timeliness goals outlined in NRO-COM-108.
<u>Lead:</u>	NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Objective, Risk-Informed, Understandable, Open, Effective
<u>Analysis:</u>	Five of the six TARs closed in 2018 were closed in accordance with the timeliness requirements specified in NRO-COM-108. The TAR that was not closed by the requested due date in 2018 was initiated in 2016 and addressed programmatic issues that required a complex resolution. The staff concluded that, although the metric was missed, there was no adverse impact on ongoing or planned construction inspection activities.

2522A-02	SIGNIFICANCE DETERMINATION PROCESS METRICS
SDP-1	<u>SDP Results Are Predictable and Repeatable</u>
<u>Met:</u>	Yes
<u>Definition:</u>	Audit 100% of construction inspection program inspection findings issued during the calendar year against the significance determination process in IMC 2519, "Construction Significance Determination Process," and its appendices.
<u>Acceptance Criteria:</u>	<p>If greater than 10 findings were issued during the calendar year, then at least 90% of them contain adequate detail to enable an independent auditor to trace through the significance determination process in IMC 2519 and its appendices and reach the same significance color characterization.</p> <p>If 10 or fewer findings were issued during the calendar year, then no more than 1 of them did not contain adequate detail to enable an independent auditor to trace through the significance determination process in IMC 2519 and its appendices and reach the same significance color characterization.</p>
<u>Lead:</u>	NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Risk-Informed, Predictable
<u>Analysis:</u>	All findings issued in 2018 were reviewed by two independent audits, and all of the findings contained adequate detail to enable the independent auditor to trace through the significance determination process in IMC 2519 and its appendices and reach the same significance color characterization.

SDP-2	<u>Appeals of SDP Results</u>
<u>Met:</u>	Yes
<u>Definition:</u>	Track the total number of appeals of final SDP results during the calendar year.
<u>Acceptance Criteria:</u>	Zero appeals of SDP significance that result in a final determination being overturned during the calendar year.
<u>Lead:</u>	Regions, NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Risk-Informed, Objective, Predictable, Understandable, Open
<u>Assessment:</u>	There were no appeals of final SDP results during CY 2018.

2522A-03	ASSESSMENT PROGRAM METRICS
AS-1	<u>Deviations from the Construction Action Matrix</u>
<u>Met:</u>	Yes
<u>Definition:</u>	Audit all assessment-related letters during the calendar year and count the number of deviations from the Construction Action Matrix.
<u>Acceptance Criteria:</u>	Zero deviations from the Construction Action Matrix during the calendar year.
<u>Lead:</u>	NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Objective, Risk-Informed, Open
<u>Assessment:</u>	There were no deviations from the Construction Action Matrix during CY 2018.

AS-2	<u>Assessment Program Results (Assessment Reviews, Assessment Letters and Public Meetings) Are Completed in a Timely Manner</u>
<u>Met</u>	Yes
<u>Definition:</u>	Audit 100% of Assessment Reviews, Assessment Letters and Public Meetings issued/conducted during the calendar year in relation to the timeliness requirements in IMC 2505, "Periodic Assessment of Construction Inspection Program Results."
<u>Acceptance Criteria:</u>	At least 90% of the timeliness goals for the assessment process are met during the calendar year.
<u>Lead:</u>	Region, NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Effective, Open, Predictable
Assessment:	All Assessment Reviews, Assessment Letters and Public Meetings issued/conducted during CY 2018 met the timeliness requirements in IMC 2505, "Periodic Assessment of Construction Inspection Program Results."

AS-3	<u>Timeliness of Supplemental Inspections</u>
<u>Met:</u>	N/A
<u>Definition:</u>	Count the number of instances during the calendar year where a finding was held open for more than six months due to the need to complete the supplemental inspection.
<u>Acceptance Criteria:</u>	No instances during the calendar year when a supplemental inspection has not been completed within six months for which the licensee had indicated they were prepared for the inspection.
<u>Lead:</u>	Region, NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Effective, Predictable
<u>Assessment:</u>	There were no supplemental inspections required during CY 2018.

AS-4	<u>Degradations in Quality of Construction are Gradual and Allow Adequate Agency Engagement of the Licensee</u>
<u>Met:</u>	Yes
<u>Definition:</u>	Track the number of instances during the calendar year in which a construction site moves more than one column to the right in the Construction Action Matrix.
<u>Acceptance Criteria:</u>	No instances during the calendar year in which performance issues cause a construction site to move more than one column to the right in the Construction Action Matrix.
<u>Lead:</u>	NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Risk-Informed, Predictable
<u>Assessment:</u>	There were no instances during FY 2018 in which a construction site moved more than one column to the right in the Construction Action Matrix.

2522A-04	ITAAC METRICS
ITA-1	<u>Analysis of ITAAC Reopened After Closure Verification</u>
<u>Met:</u>	Yes
<u>Definition:</u>	Audit 100% of ITAAC that are reopened after closure verification during the calendar year.
<u>Acceptance Criteria:</u>	No ITAAC have been verified as having been met that are reopened during the calendar year because of a deficiency in the process that was within the NRC's ability to identify before closure verification.
<u>Lead:</u>	NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Effective, Risk-Informed
<u>Assessment:</u>	There were no ITAAC that were reopened as a result of a deficiency during CY 2018.

2522A-05	OVERALL cROP METRICS
O-1	<u>Analysis of NRC's Responses to Significant Events</u>
<u>Met:</u>	N/A
<u>Definition:</u>	Review 100% of incident investigation teams (IITs) and augmented inspection teams (AITs) inspection reports that are issued during the calendar year to determine if major programmatic voids were identified during the cROP review portion of IITs and AITs.
<u>Acceptance Criteria:</u>	No major programmatic voids are identified during the cROP review portion of IITs and AITs.
<u>Lead:</u>	NRO/DCIP (CIPB)
<u>Goals Supported:</u>	Effective, Predictable
<u>Assessment:</u>	There were no IITs or AITs performed or issued during CY 2018.