



Reactor Oversight Process

ROP Enhancement Project Update

ROP Public Meeting
March 27, 2019

Introductions and Opening Remarks

Agenda

<u>Time</u>	<u>Topic</u>	<u>Speaker</u>
1:00 pm	Introductions/Opening Remarks	NRC Management and Industry
1:15 pm	ROP Enhancement	NRC Staff
2:00 pm	Stakeholder Feedback	External Stakeholders
2:30 pm	Open Discussion	All
3:15 pm	Next Steps	NRC Staff
3:30 pm	Questions and Comments	Members of the Public
3:45 pm	Closing Remarks	NRC Management and Industry
4:00 pm	Meeting Adjourned	

Meeting Purpose

- To update industry and public on the status of the ROP enhancement project
- To hear industry and public views and feedback on three major ROP enhancement themes presented

Background

- Received 72 recommendations for enhancing the ROP from NRC Transformation initiative – August 13, 2018
- Received 27 recommendations provided to NRR by NEI – September 19, 2018
- Discussions at Operating Reactor Business Line and NRC Transformation Team Commission meetings – fall 2018
- ROP enhancement project initiated – October 2018
- Goal is to provide a SECY paper to the Commission – June 2019

ROP Enhancement Goals

- Make the ROP more risk-informed and performance-based
- Further improve consistency with the NRC's Principles of Good Regulation
- Improve the ROP's efficiency and effectiveness

Objectives

- Focus NRC oversight on issues of higher safety significance
- Enhance the Significance Determination Process (SDP) through improved procedures, risk assessment tools and communications
- Improve efficiency and effectiveness of inspection program
- Improve communications between NRC and nuclear industry

Project Infrastructure

- NRR office director is executive sponsor, NRR/DIRS is management team
- Recommendations binned into eight areas (themes)
 - Each theme assigned a manager and SME(s)
- Developed extensive project management tools
- Held numerous internal and external stakeholder meetings
- Developed internal SharePoint site and external website

<https://www.nrc.gov/reactors/operating/oversight/rop-enhancement.html>

Guiding Principles

- Leveraging ROP self-assessment process
- Maintaining/improving upon ROP strengths
 - objective, predictable, transparent
- Developing a strong basis for important changes
- Obtaining stakeholder feedback
- Taking into account alternative views
- Not a “one and done” effort

Strong Regional Involvement

- Collaboration through pre-existing initiatives (EP, security, RP, engineering inspection work)
- Inspector seminar/inspector newsletters
- Extensive regional engagement
- Regional Advisory Panel (RAP) established
 - Jimi Yerokun, Joel Munday, Mohammed Shuaibi, Tony Vogel

Commission Paper Content

- Main paper to include those proposals that require Commission approval and notification
- Enclosures for each thematic area to include supporting information, completed actions, and longer-term actions
- Analyses to support changes such as historical industry performance, nuclear safety trends, and supporting program data

Reference SRM/COMSECY-16-022

Three Major Themes in Paper

- NRC response to White inspection findings
- Baseline Inspection Program taking into account nuclear safety trends since ROP began
- Significance Determination Process (SDP) improvements

Major Theme 1 - NRC Response to White Findings

- Press release guidance for White findings
- White and Yellow finding labels to low and moderate significance, respectively, and conforming changes to Action Matrix such as:
 - communications to State and local governments
 - Column 2 language to align with finding labels
- Supplemental inspection for White findings
- Four quarter requirement for GTG findings
 - option to revise treatment of GTG PIs

Major Theme 2 – Baseline Inspection Program

- As part of the review staff considered:
 - Risk Insights (DRA and regional SRA inputs)
 - Plant Performance
 - Results from IMC 0307B biennial Self Assessment
 - Feedback from all levels of regional staff and management
 - Recommendations evaluated by experienced SRIs, RIs, regional inspectors and HQ IP Leads
 - Adjustments based on comments by the Regional Advisory Panel (RAP)

Major Theme 2 – Baseline Inspection Program

- Inspectable areas unaffected
- Optimize Baseline Inspection Program
 - Adjust inspection samples/hours for numerous IPs
 - Combine certain IPs for efficiency (surveillance test and PMT)
 - Modify ALARA inspection based on continuous decline in occupational exposure
 - Change frequency of PI&R team inspections from biennial to triennial

Major Theme 3 – SDP Improvements

- Risk-inform the EP SDP using defense-in-depth philosophy and distinguishing significance of certain planning standards
- Revise approach to updating IMC 0609, Appendix M
- Incorporate IMC 0609, Appendix O (Mitigating Strategies SDP) into to IMC 0609, Appendix A (At Power SDP)
- Review current SDP and IFRM process to identify additional opportunities to enhance interactions with licensees

Commission Approval Needed

- Eliminate the 4 quarter requirement for GTG findings
 - option to revise treatment of GTG performance indicators
- Optimize the Inspection Program
- Risk-inform the emergency preparedness SDP

Reference SRM/COMSECY-16-022

Longer-Term Activities

- Evaluate revisions to performance indicators
- Perform holistic review of PI&R inspections
- Re-evaluate the Cross-Cutting Issues Program
- Optimize Independent Spent Fuel Storage Installation inspections
- Optimize radiation protection inspections
- Evaluate SDP infrastructure improvements
- Assess additional actions identified in emergency preparedness focused self-assessment

Out-of-Scope Recommendations

- Recommendations associated with regional structure and organization
- Resolution of low risk compliance issues
 - Evaluate as part of separate working group
- Backfit and licensing basis recommendations
 - Resolve through broader agency backfit initiative
- Proposals to streamline inspection reports
 - Address through ongoing ISTAR initiative
- Other miscellaneous recommendations evaluated through ROP self-assessment



Stakeholder Feedback



Open Discussion

Next Steps

- Commission paper concurrence (April – June 2019)
- Implement Commission approved recommendations
- Assess actions for next ROP enhancement phase
- Perform a lessons learned on the ROP enhancement project
- Meet with industry, as needed, during routine ROP monthly meetings



Closing Remarks