

SUNSI Review Complete  
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ATTN: Program Management, Announcements and Editing Staff.

Subject: Reactor Oversight Process Enhancement Initiative  
NRC-2019-0155-0001

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I have major concerns that the public was not adequately consulted during this change.

1. What areas of the ROP are working well?
  - a. Initial qualification of licensed operators is working well.
  - b. Emergency Preparedness exercises are working well.  
Both of these are streamlined process, and rather than a one size fits all inspection these meet the specific needs of these areas.
2. What areas of the ROP are not working well?
  - a. Requalification of licensed operators. The agency appears to rubber stamp the stations requalification program, and do not dive into the detail needed to determine if licensed operators maintain proficiency. When a substantial operator human performance issue occurs, why is the integrity of the training program not re-inspected? For example, when Oconee did an on the spot change last year to change the reactor trip set point during a loss of vacuum event, this is not what would have happened during an operator JPM.
  - b. PRA. Stations have adopted risk informed licensing basis, but the NRC remains behind the times by not inspecting the stations PRA.
  - c. Team inspections. Senior management needs to be aware that during NRC team inspections the inspectors just review paperwork in the 'team room', and are not out in the field observing workers and monitoring field conditions. If the expectation of senior management is to just review paperwork then that should be done remotely. If the expectation is to be in the field then supervision of the NRC inspectors needs to occur.
3. How can the NRC improve the ROP in the following areas:
  - The problem identification and resolution inspection program.  
The NRC does not have a defined standard beyond criterion XVI of what constitutes a corrective action program. The NRC needs to define acceptable standards for what constitutes an acceptable extent of condition review. Also open to interpretation is when a new IR is warranted or the old IR can just be updated. In the absence of guidance the inspectors are making these criteria up.
  - The cross-cutting issues process  
INPO 12-012 and NUREG-2165 are not identical and therefore there is still not a common language.

The cross cutting issue process is arbitrary and should be eliminated. The NRC has no business in regulating human performance and questioning attitude.

Radiation protection inspections,

No comments.

ISFSI inspections

These inspections are over the top for the amount of inspectors the NRC sends. There is minimal nuclear safety risk associated with the casks. These inspections have turned into industrial safety reviews and are outside the scope of NRC inspections.

and the SDP?

No comments.

Final comment:

I request that the NRC conduct regional meetings to solicit public interaction and the commissioners conduct a public briefing on the topic.

Thank you for your time.