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Attachments: [NEI Feedback on CC Issue Process 20190922.pptx](#)

Tekia/Alex,

Attached is a presentation file summarizing our perspective on the cross-cutting issue process. We would like to use this during the discussion of the cross-cutting issue effectiveness evaluation during Wednesday's ROP public meeting, if your schedule allows time. If there isn't time for this presentation on Wednesday, we can save it for a later date or a focused meeting on this topic.

Best regards,

Jim

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Industry Feedback on Cross-Cutting Issue Process

ROPTF Meeting
September 25, 2019



Cross-Cutting Issue Process



- Purpose: Provide industry feedback on the cross-cutting issue process for consideration in the NRC's effectiveness evaluation
- Key Feedback:
 1. Current CC process is one of several tools for NRC to assess licensee performance
 2. CC results since 2015 reflect improved industry performance and practicality of the new thresholds
 3. Current CC process balances the need to accumulate sufficient data to determine causes and the need to intervene in time to arrest a cross-cutting weakness and verify corrective actions are effective

- Monitor performance of ROP cross-cutting areas
- Communicate concern with licensee performance in CC aspect or area
 - “Encourage” licensee action
 - “Provide” opportunity to address
- “Anticipatory”
 - 2014 SCCI Effectiveness Review - Not Anticipatory

Feedback

- Current process is improved & effective
 - Six findings/theme
 - ◆ Licensee incentivized to take action (typically at 50% of threshold)
 - ◆ Sufficient data to determine common driver
 - ◆ Signifies actual trend rather than data scatter
 - Three successive six-month periods
 - ◆ Permits time to implement corrective actions and gauge effectiveness
 - Backstop identifies broadly distributed issues or persistent trend
 - ◆ Drives understanding of common drivers over a cross-cutting area

Results

- No cross-cutting issues assigned
- Backstop & Themes have been triggered
 - Licensee corrects in accordance with its corrective action program
 - Resolved in 12 months
 - ◆ Time to resolve improved over previous SCCI process
 - ◆ Obviates concern w/subjective closure criteria or aspect assignment
 - Significantly fewer themes established
 - ◆ Valid conclusion using old criteria of four findings
 - ◆ Attributed to the identified trends matching causal analysis results leading to credible corrective actions targeting actual issue
 - Less repeat Aspect themes triggered

Summary



- Current process is consistent w/intent
- Current process is effective
 - Results reported by NRC staff support conclusion
- NRC has an array of tools to assess performance in concert w/cross-cutting issue process providing a diverse and comprehensive approach to performance assessment