

# PUBLIC SUBMISSION

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Russell Gibbs, Manuel  
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**Docket:** NRC-2019-0155  
Reactor Oversight Process Enhancement Initiative

**Comment On:** NRC-2019-0155-0001  
Reactor Oversight Process Enhancement Initiative

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## Submitter Information

**Name:** Larry Parker  
**Address:**  
6751 N Sunset Blvd  
Suite E-460  
Glendale, AZ, 85305  
**Email:** larry.parker@starsalliance.com

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## General Comment

See attached file(s)

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## Attachments

STARS ROP comment letter



[www.starsalliance.com](http://www.starsalliance.com)

6751 N Sunset Blvd  
Suite E460  
Glendale, AZ 85305  
T: 623-209-7549

**Alliance Stations:**

Callaway Energy Center  
Diablo Canyon Power Plant  
Palo Verde Generating Station  
Wolf Creek Generating Station

STARS-19002

October 7, 2019

Office of Administration  
Mail Stop: TWFN-7-A60M  
U.S. Nuclear Regulatory Commission  
Washington DC 20555-0001

ATTN: Program Management, Announcements and Editing Staff

Subject: Comments on Reactor Oversight Process Enhancement Initiative  
[Docket ID NRC-2019-0155]

Dear Commissioners and Staff,

STARS Alliance LLC appreciates the opportunity to comment on the Reactor Oversight Process (ROP) Enhancement Initiative contained in the Federal Register Notice (FRN) dated August 7, 2019.

Since the inception of the ROP nearly twenty years ago, the number of hours that the NRC spends each year conducting baseline inspections has edged up, at times exceeding 10,000 hours for a typical two-unit station. Meanwhile, by nearly every measure, the industry has significantly improved safety, security, and performance. For example,

- In 2018, US nuclear plants generated the most electricity ever, despite the reduced number of operating plants.
- In recent years NRC Performance Indicators are generally all Green, while there were dozens of White indicators during the early years of the ROP.
- The Action Matrix shows the percentage of plants in Licensee Response (Column 1) is consistently very high. Currently, 96% of the industry is in Column 1 and no station is worse than Column 2.
- The number and significance of inspection findings continues to decrease.
- Industry and the NRC have developed many inspection efficiency tools over the years. For example, twenty years ago, most inspections primarily involved boxes of paper records, while today, electronic word-searchable databases of records enable inspectors to be much more efficient and effective.

As a result, the STARS Alliance encourages the NRC to continue with the ROP Enhancement Initiative to modernize the ROP making it more efficient and focused on the more safety-significant issues. The 12 monthly public meetings culminating in SECY-19-0067 demonstrated the NRC's deliberate process to improve the ROP. We encourage the NRC Commissioners to approve the recommendations in the SECY. We also encourage NRC staff to continue these efforts to develop longer-term recommendations, including making the deterministic significance determination processes (SDP) more risk-informed.

Furthermore, the STARS Alliance is aligned with the industry initiatives and endorses the recommendations contained in Nuclear Energy Institute (NEI) letters. Specifically, NEI submitted 27 recommendations in a letter from Bill Pitesa (NEI) to Ho K. Nieh (NRC), "ROP Enhancement," September 19, 2018, ADAMS ML18262A322, a letter from Jennifer Uhle (NEI) to Ho Nieh, "Proposed SECY on ROP Enhancements," May 20, 2019, and the NEI letter submitted today in response to this FRN.

In conclusion, the STARS Alliance supports the NRC's mission of protecting public health and safety, and encourages the NRC to continue its efforts to pursue the principles of good regulation by making the ROP more efficient.

If you have any questions, please contact Larry Parker, STARS Alliance, at [larry.parker@starsalliance.com](mailto:larry.parker@starsalliance.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Meyer", with a long, sweeping horizontal line extending to the right.

Steve Meyer  
Regulatory Affairs Functional Area Manager