

Reactor Oversight Process Enhancement

Questions and Answers

1. Transformation and enhancement appear to be one and the same. What are the distinctions?
 - The NRC's Transformation Initiative and the ROP Enhancement Project are related and have the same goal of enhancing the NRC's effectiveness and efficiency.
 - In 2018, the NRC established a team for the Transformation Initiative. The team received numerous recommendations from staff and stakeholders for ideas for transforming and improvements in various areas across the agency. As part of this effort, the team received recommendations for enhancing the ROP.
 - The ROP Enhancement Project evaluated the recommendations to improve the efficiency and effectiveness of the ROP while taking into account NRC experience since the ROP began and overall industry improvements in safety and security.
2. What type of enhancements are being considered?
 - Self-assessment and continuous improvement have always been key components of the ROP. However, this ROP Enhancement Project began to specifically evaluate the internal and external recommendations that were received as part of the agency's Transformation Initiative that were related to the ROP.
 - The ROP Enhancement Project was tasked with evaluating the 72 staff recommendations and 27 industry recommendations. The recommendations were binned into areas including: assessment, inspection, significance determination process, radiation protection, independent spent fuel storage inspections (ISFSI), security, and emergency preparedness.
 - The near-term enhancements have been referred to as "Phase 1" and included in SECY 19-0067 with recommendations for Commission approval such as changes to improve consistency and NRC response for addressing White inspection findings and performance indicators and changes in inspection sample sizes that will allow inspector flexibility and focus on emergent or safety significant issues.
 - The areas where more time was needed to evaluate have been referred to as "Phase 2" and includes reviews of the Cross-Cutting Issues (CCI) Program, Problem Identification & Resolution (PI&R) inspections, and Radiation Protection and ISFSI inspection programs to evaluate which enhancements could be recommended.
3. Why is ROP Enhancement important?
 - The NRC's strategic plan vision is to demonstrate the Principles of Good Regulation (independence, openness, efficiency, clarity, and reliability) in performing our mission.
 - The ROP is a robust and mature program with built-in, continuous improvement features to make certain the inspection program remains aligned with the Principles of Good Regulation. To maintain its continued effectiveness, the NRC performs annual evaluations and self-assessments of the ROP.
 - As part of the agency's safety strategy, the NRC is constantly pursuing ways to improve the efficiency of its processes to remain a modern and risk-informed regulator and ensure appropriate focus and resources on the most safety significant issues.
 - ROP Enhancement is a part of that strategy toward ensuring the inspection and oversight programs remain effective given the safety improvements and experience

gained over the past several.

4. What are recent examples of how the NRC has already enhanced the ROP?

Recent enhancements include the Engineering Inspection Focused Assessment, the Emergency Preparedness Significance Determination Process Focused Assessment, improvements to the back-fit process, and security inspection updates. This Enhancement initiative continues to build on the current work and to expand to other areas of the ROP to improve efficiency and effectiveness.

5. Why is there so much emphasis on enhancement now?

Self-assessment and continuous improvement have always been key components of the ROP. Over the years of the ROP, there have been several changes to enhance the focus on emergent or safety significant issues, such as increased inspection focus and resources made as a result of 9/11 and the Fukushima accident. However, this ROP Enhancement Project began to specifically evaluate the internal and external recommendations that were received as part of the agency's Transformation Initiative that were related to the ROP.

As NRC strives for excellence in ensuring the safe and secure use of nuclear materials in the 21st century, it must adapt its practices to keep pace with new and emerging advanced technologies and embrace enhancement to improve the ROP in a manner which supports NRC's Principles of Good Regulation.

6. Will this enhancement initiative reduce cost to the agency and ultimately plant owners and operators?

The overall goal of our enhancement initiative is not cost reduction, but rather to better risk-inform and performance-base the ROP while at the same time look for ways to improve the ROP's efficiency and effectiveness.

7. How will ROP Enhancement impact NRC's safety and security mission?

NRC safety and security mission remains unchanged. The overall goal of the enhancement initiative is to continue to align with NRC Principles of Good Regulation while maintaining its safety and security mission.

8. Will NRC staff have an opportunity to provide input to the enhancement initiative, and will the Commission be made aware of staff's input?

Yes. NRC cannot underestimate the importance of staff input. Employees' formal training and breadth of experience are critical to better understand what is necessary to further develop and advance the ROP. Consistent with NRC's Principles of Good Regulation, our mission, and NRC Values, NRC will continue to seek feedback from staff and external stakeholders.

9. Does the NRC Commission need to approve the plan concept as well as the final plan prior to implementation?

Recommendations requiring Commission approval or notification will be accomplished in accordance Commission Policy as described in NRC Management Directive 8.13, "Reactor Oversight Process."

10. Will industry/members of the public have an opportunity to provide input?

Yes. Industry, stakeholder, and public feedback is critical to successful development of enhancement initiatives. NRC will continue to use the tools available to gather and consider the external stakeholder input and feedback. NRC conducted a Regulatory Information Conference session on March 13, 2019, has held over 15 public meetings and issued a Federal Register Notice to further gather stakeholder and public feedback and established an external public web page was developed to provide status on ROP Enhancement.

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

The NRC will continue to conduct public meetings to provide opportunities for external engagement and input.

11. Who are the decision-makers on what changes get implemented?

As described in NRC Commission Policy (MD 8.13), criteria for what changes to the ROP need to be communicated to them for notification or approval are provided. SECY-19-0067 was submitted to the Commission for approval of the first group (Phase 1) of recommendations. Proposed changes such as removing the four-quarter action matrix requirement for greater-than-Green inspection findings require Commission approval. Other changes, such as revising the description of a White finding from "low to moderate" to "low" and Yellow findings from "substantial" to "moderate" safety significance, require Commission notification.

12. Can you give examples of improved licensee performance and nuclear safety over the last 20 years?

Numerous enhancements have been made over the last 20 years such as decreases in occupational radiation dose, improved security systems post 9/11, reduction in the number of reactor scrams/trips, increased reliability of important safety systems, hardware improvements such as FLEX equipment, reductions in plant core damage frequencies for internal events, improved licensee programs for identifying and correcting problems, better plant outage risk management, and improved understanding of plant fire risk through adoption of NFPA 805.

13. Now that the Commission paper (SECY-19-0067) was submitted in June 2019 to the Commission, is the ROP Enhancement project completed?

No. The near-term enhancements, referred to as "Phase 1," were included in SECY 19-0067 and are awaiting Commission decision. The areas where more time is needed to evaluate have been referred to as "Phase 2" and includes reviews of the Cross-Cutting Issues (CCI) Program, Problem Identification & Resolution (PI&R) Inspections, and the Radiation Protection and ISFSI inspection programs to evaluate what enhancements could be recommended.

14. Taking into account that the NRC staff has recommended a modest reduction in the Baseline Inspection Program, what will the inspectors do with their extra time?

The changes being proposed are relatively small considering that over 2,500 hours of inspection hours will continue to be performed every year at each reactor site in the U.S. NRC inspections at nuclear power plants are performed by both resident and region-based inspectors who inspect a broad range of areas that have been determined to be the most important from a safety and security perspective. All the inspectable areas will continue to be inspected with several adjustments proposed to the number of inspection samples performed for selected inspections. These adjustments were deemed appropriate after a close examination by experienced inspectors based on nearly 20 years of oversight experience and improved industry performance. The number of resident inspectors at each site is not changing. Any time not spent on the required inspection samples, the resident inspectors will use to respond to emerging or complex issues and support for other inspection program areas. These small adjustments will provide more flexibility to the inspectors for pursuing more significant issues and will not affect the NRC's ability to provide oversight to protect public health and safety and the environment.