

IP 95001 “Supplemental Inspection Response to Action Matrix Column 2 Inputs”

ROP Public Meeting
NRC Headquarters January 22, 2020
Ross Telson, IP 95001 Lead

IP 95001 Need for Change

- **ROP Self Assessment and Internal Review**
[ML19070A036](#), [ML19043A925](#)
- **Differing Professional Opinions**
[ML19037A169](#)
- **OIG Audit**
[ML19256A776](#)
- **Stakeholder feedback**
[ML19070A050](#), [ML18262A322](#), [ML18127A080](#),

Review of Proposed Changes

- **Improved Definitions & Descriptions**
- **Improved Clarity & Communications to Manage Inspection “Challenges”**
- **Ensuring Sufficient Supplemental Inspection & Documentation Rigor**
 - **Prior to Closing White [GTG] Issues**
 - **Prior to Holding White [GTG] Issues Open**

IP 95001 Basis (IMC 0308 Att 2 Fig. 48) 1 of 3

- To provide for adequate protection of public health and safety, once a [white] performance issue is identified, the NRC needs to ensure that licensees ... identify the causes of the performance issue and preclude repetition.
- The most effective and efficient way for the NRC to accomplish this objective is to allow the licensee the opportunity to perform their own evaluation of the performance issue, and then to perform a review of the licensee's evaluation.

IP 95001 Basis (IMC 0308 Att 2 Fig. 48) 2 of 3

- The inspection requirements contained in this procedure represent a comprehensive set of attributes related to problem identification, root cause analysis, and establishment of corrective actions.
- To ensure that the causes of the performance issue are identified and that effective corrective actions are taken to prevent recurrence, it is expected that the licensee's evaluation will generally need to address each of the inspection requirements;
- However, the depth of the licensee's analysis may vary depending on the significance and complexity of the issue(s).

IP 95001 Basis (IMC 0308 Att 2 Fig. 48) 3 of 3

- **While:**
 - **Inspection requirements do not necessarily represent NRC requirements for the licensee,**
 - **Significant weaknesses in the licensee's evaluation may require that the NRC conduct additional inspections to acquire the information independently.**
- **The inspection requirements should be independent of the specific root cause methodology chosen by the licensee.**

Proposed Changes (1 of 3)

- **Improved Definitions & Descriptions:**
 - **General Weaknesses**
 - **Significant Weaknesses**
 - **Causal Analysis**
 - **Root Cause Analysis (RCA)**
 - **Apparent Cause Evaluation (ACE)**

Proposed Changes (2 of 3)

- **Improved Clarity & Communications to manage inspection “challenges”**
 - **Focusing on what licensee analysis accomplishes – not what it is called**
 - **Considerations for Delaying, Suspending, or Expanding Inspection**
 - **Prompt Engagement of Licensee, and NRC Management**

Proposed Changes (3 of 3)

- **Ensure Necessary Supplemental Inspection & Documentation Rigor Prior to Closure of White Issue(s)**
 - Satisfactorily completion of IP 95001 is notably different than completing a baseline inspection “no finding” sample.
 - IP 95001 closure must be supported by NRC documentation sufficient to enable an independent reader to attain the level of confidence necessary to conclude that the NRC fully and independently addressed the licensee’s actions.
 - The documentation must affirm that the IP 95001 objectives were met and support the decision to close the White Issue(s).

Not Expected to Change Significantly

- Licensee Regulatory Obligations [Requirements]
- IP 95001 Bases [IMC 0308 Att. 2]
- Inspection [Inspector] Requirements & Guidance [though general requirements and guidance common to multiple supplemental IP's will likely migrate from IP 9500X to IMC 2515B]
- ROP [PI&R] Expectations that Licensees Identify Causes [i.e. Root & Contributing] , Extent of Cause, Extent of Condition, and Implement Prompt Corrective Actions Necessary to Preclude Repetition of White [GTG] Issues