

Discussion of Reactor Oversight Process Enhancement Initiative Public Comments

January 22, 2020
ROP Meeting

Agenda

Background of Federal Register Notice (FRN)

Overview of Comments

NRC Initial Response to Comments

Comments Regarding ROP Enhancement

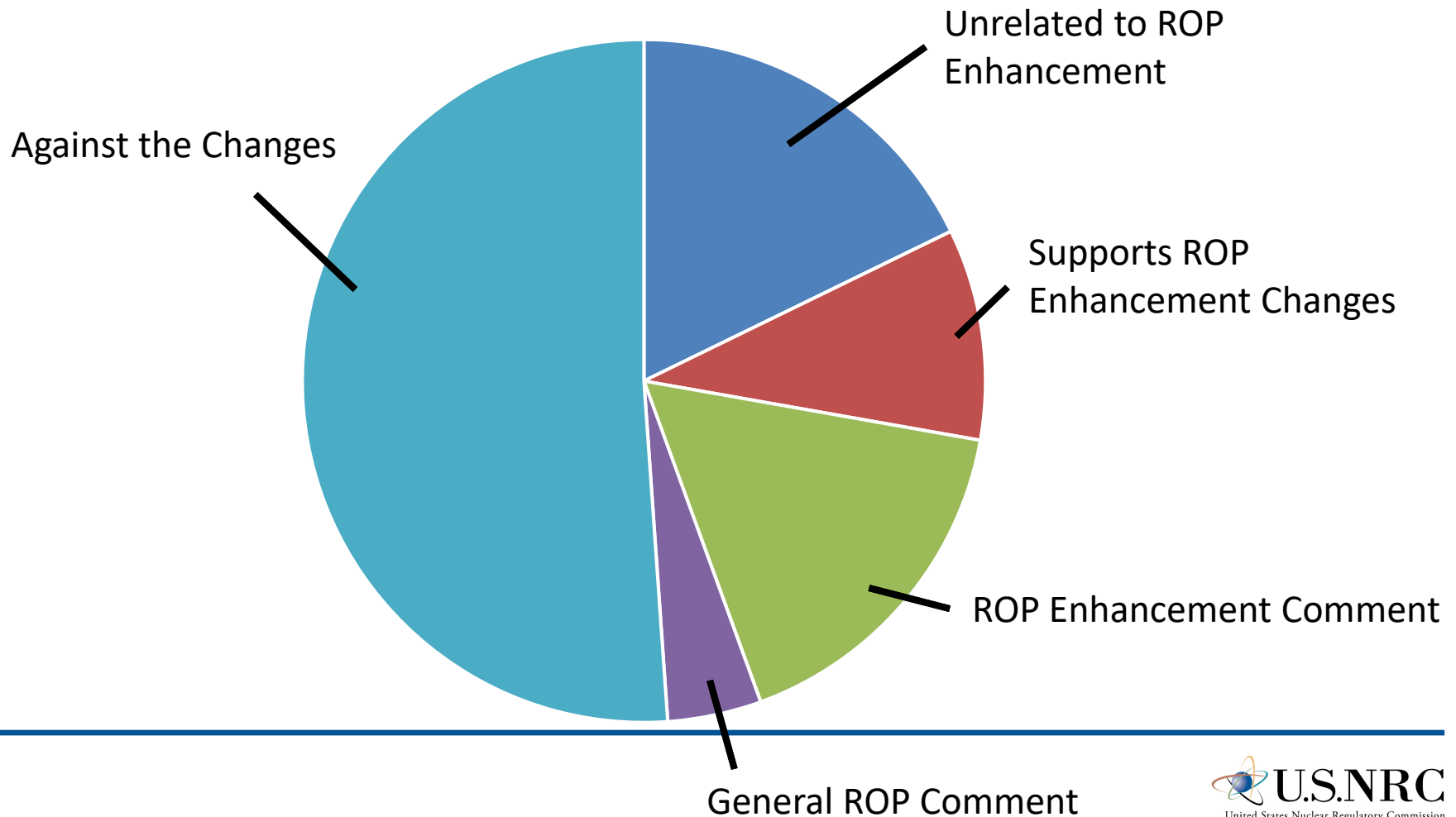
Comments Regarding the General ROP

Background of the FRN

- NRC issued SECY 19-0067, “Recommendations for Enhancing the Reactor Oversight Process,” to the Commission on June 28, 2019
- Congressional House Committees on Energy and Commerce and Appropriations requested a public comment period prior to a Commission vote
- NRC issued FRN (2019-0155) for a 60 day comment period that ended on October 7, 2019

Overview of Comments

- NRC received 90 comments on the FRN



NRC Response to Comments

- All 90 comments forwarded to Commission for consideration in their vote on SECY 19-0067
- Comments with details and suggestions related to ROP Enhancement were forwarded to the thematic leads for consideration in their working groups.

Comments Regarding ROP Enhancement (General Public)

NRC should:

- strengthen oversight and frequency of inspection of Corrective Action Programs
- begin inspecting licensee's Probabilistic Risk Assessments (PRAs)
- eliminate the Cross Cutting Issues program
- reduce Independent Spent Fuel Storage Installation inspections
- align baseline inspections with risk profiles of individual plants

Comments Regarding ROP Enhancement (Government)

State Government Organizations felt NRC should:

- Maintain current baseline sample requirements
- Gain additional input from State & Federal stakeholders for Emergency Preparedness changes
- Wait for Problem Identification and Resolution Comprehensive review to be completed and evaluate industries' self-assessment changes

Comments Regarding ROP Enhancement (Industry)

Industry endorsed the recommendations submitted through the Nuclear Energy Institute:

- Leverage third party inspection of Corrective Action Programs and clarify the term “root cause”
- Disagrees with how Greater than Green Performance Indicators should be treated
- Cross Cutting Issues program should be eliminated

Comments Regarding ROP Enhancement (Non-Government Organization)

NRC should:

- Maintain the ALARA inspection procedure
 - Greater than Green inputs should remain for 4 quarters to identify systemic issues
 - Evaluate reductions in inspections only after comprehensive program reviews
 - Rethink the credit given to FLEX equipment
 - Ensure aging plants are receiving more inspection
-

Comments Regarding General ROP

NRC should:

- focus on PRAs, commitment management of licensee, qualifications of the non-operation staff, and revamping the Performance Indicators Program
- stop inspecting vendors
- improve the detail within Inspection Reports

ROP Enhancement Continues