



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

January 27, 2020

MEMORANDUM TO: Anthony D. Masters, Chief  
Reactor Assessment Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

FROM: Alexander D. Garmoe, Senior Reactor Operations Engineer /RA/  
Reactor Assessment Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE CROSS-CUTTING ISSUES  
EFFECTIVENESS REVIEW PUBLIC MEETING HELD ON  
JANUARY 10, 2020

On January 10, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force and other industry representatives. The purpose of the meeting was to hold a follow-up discussion of the staff's ongoing effectiveness review of the ROP cross-cutting issues (CCI) program and provide an opportunity for questions and comments from external stakeholders. The initial discussion occurred as part of the ROP public meeting held on November 20, 2019 (Agencywide Documents Access and Management System (ADAMS) ML19312B550). A summary of the discussion topics is provided below.

The Director for the Division of Reactor Oversight and the Branch Chief of the Reactor Assessment Branch provided opening remarks and summarized the thorough review conducted by the team. The draft conclusions and recommendations were well-reasoned and the purpose of this meeting was to provide an opportunity for questions and feedback on the team's work, which was initially presented at the November 20 ROP public meeting (ADAMS ML19322A014).

Before providing an opportunity for questions and feedback the staff provided a recap of the information presented at the November 20 public meeting. Throughout the staff's presentation industry raised questions and provided comments about the team's work, conclusions, and recommendations. Industry comments largely consisted of the following themes: staff is lowering the bar in response to improved industry performance, this appears to be aggregating Green findings, and the staff did not properly consider available data.

As in the November 20 meeting, the staff's presentation explained much of the information and data that was reviewed by the team and how that led to proposed conclusions and recommendations. The staff reiterated that the team's review and proposed conclusions and

CONTACT: Alexander D. Garmoe, NRR/DRO  
301-415-3814

recommendations were also informed through extensive consideration of external and internal stakeholder feedback. The program objective is essentially to identify low level performance trends in pre-defined cross-cutting areas that could lead to more significant performance issues, and to encourage actions before such significant performance issues occur. To accomplish this objective, the program must be responsive to low level trends without being so sensitive that it is vulnerable to false positives. The number of inspection findings issued has trended downward significantly and was the subject of a separate staff study, available in ADAMS as ML19225D281. The impact on the CCI program is that the same magnitude of outlier that would have tripped a program threshold in 2015 would not trip a program threshold today. This challenges the ability of the program to identify low level trends and encourage actions ahead of significant performance issues.

The staff also discussed that the proposed CCI program changes, in particular the proposed reduction of the existing 23 cross-cutting aspects that can be assigned to a finding, do not represent an aggregation of Green findings. The program has always, from its onset, been about aggregating behavioral factors that contribute to certain inspection findings to identify trends that increase the vulnerability to the occurrence of more significant performance issues. The complexity of the existing program, especially when combined with the reduction in data available to the program, further challenges the ability to identify developing trends ahead of significant performance issues.

One member of the public suggested the staff consider a relative threshold that would auto-adjust as the nation-wide inspection findings environment shifts. The staff noted that this was discussed as part of the effectiveness review, and from a data analysis perspective there is merit to the concept, but the team had concerns with maintaining a reliable, predictable, and consistent program and felt that this is best served with a stable threshold.

Consistent with the intent of this meeting, the effectiveness review team will consider the feedback provided as it develops conclusions and recommendations on the cross-cutting issues program. The team will transmit its conclusions and any recommendations to NRR management, as is typically done for ROP self-assessment effectiveness reviews. Management will review the team's report and determine whether to support moving forward with any or all of the team's proposals. At this point the team anticipates completion of the report in February, though this is dependent on the time needed to adequately consider external feedback. Staff has no current estimate on if and when any future engagement at the Commission level would occur. Follow-up discussions on the CCI effectiveness review will be included on the agendas for upcoming ROP taskforce public meetings and it is possible that additional public meetings focused specifically on the CCI process may be held.

Enclosure:  
Attendance List

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PUBLIC MEETING HELD ON JANUARY 10, 2020

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**CROSS-CUTTING ISSUES EFFECTIVENESS REVIEW PUBLIC MEETING  
ATTENDANCE LIST  
January 10, 2020**

Edwin Lyman	Union of Concerned Scientists	Mirela Gavrilas	NRC
Larry Parker	STARS Alliance	Chris Miller	NRC
Marty Murphy	Xcel	Alex Garmoe	NRC
George Gellrich	Exelon	Mark Franke	NRC
Shannon Rafferty-Czincila	Exelon	Eric Bowman	NRC
Mandy Halter	Entergy	Rob Krsek	NRC
James Polickoski	TVA	David Aird	NRC
Chris Nolan	Duke Energy	Russ Felts	NRC
David Mannai	PSEG	Dan Merzke	NRC
Justin Wearne	PSEG/NEI	Anthony Masters	NRC
James Slider	NEI	William Schaup	NRC
Tony Zimmerman	Duke Energy	Stephanie Morrow	NRC
Steve Catron	NextEra	Rebecca Sigmon	NRC
Robin Ritzman	Curtiss-Wright	Nick Hobbs	NRC
Deann Raleigh	Curtiss Wright	Don Helton	NRC
Roger Wink	Ameren	Joylynn Quinones	NRC
Rob Burg	EPM		
Larry Nicholson	Certrec		

Enclosure