



Cross-Cutting Issues Program Effectiveness Review

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Background

- Annual effectiveness reviews are a part of the IMC 0307 ROP self-assessment process
- Several of the 99 ROP Enhancement recommendations suggested reviewing, revising, or eliminating the CCI program
- CCI program was due for an effectiveness review of significant program changes implemented in 2015
- An effectiveness review could address both the ROP self-assessment and the ROP Enhancement recommendations

Review Objectives

- Information and data considered:
 - CCI program objective, history, and guidance
 - CCI program and plant assessment data, including all aspects assigned since 2006
 - Principles of Good Regulation
- Main components of data review:
 - Did the program identify plants that actually had concerns in cross-cutting areas?
 - Were plants that exhibited performance concerns identified by the program and should they have been?
 - Is there a relationship between program insights and performance?

Independence

Openness

Efficiency

Clarity

Reliability

Review Conclusions

Changes made in 2015 resulted in a program that while still providing some encouragement to monitor cross cutting aspects, may be less responsive to cross-cutting behavior indicators, may provide only limited communication about cross-cutting themes, and introduced concerns about whether the program would proactively identify cross-cutting concerns consistent with the program objective.

- Changes made in 2015 resulted in a program that appears to be less responsive to cross-cutting behavior indicators
- Introduced concerns about whether the program would proactively identify cross-cutting concerns consistent with the program objective
- Review of seven Column 4 and recent outlier plants found the current program would not have opened a CCI in any case prior to performance decline
- There is a predictive relationship between increasing numbers of cross-cutting aspects and future movement in the Action Matrix or future occurrence of precursor events

Review Recommendations

- Final report available in ADAMS Package ML20239A806

Monitoring for CCIs	Identification of a CCI	Follow-up of a CCI
<p>Simplify the assignment and trending of cross-cutting aspects via one of two options:</p> <ul style="list-style-type: none">• Use nine safety culture traits (preferred)• Use three cross-cutting areas	<p>Eliminate the three assessment period waiting time</p> <p>More detailed discussion in assessment letters</p>	<p>Pre-establish follow-up guidance and objectives in baseline IP</p> <p>Timing of follow-up based on licensee readiness</p> <p>Leverage planned 9500x if available</p> <p>Cannot close CCI based solely on reduction in findings</p>

Questions

