U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Withdrawal of SECY-18-0113 (Engineering Inspection) and SECY-19-0067 (ROP Enhancement)

Background

- On August 5, the Commission issued a staff requirements memorandum (SRM) on SECY-18-0013 and SECY-19-0067 which approved both staff's request to withdraw the papers

- Staff's intent is to evaluate the bases for the previous recommendations and re-engage internal and external stakeholders, including regional inspection staff, members of the public, and the nuclear industry, on the continued validity of these and any other proposed changes to the Reactor Oversight Process, as appropriate.

Staff's current strategy

- As deemed appropriate and following the evaluation of the updated basis for the recommendations which require commission approval, the staff will consider using one or more Commission papers (Notation Vote Papers).

- Staff does not intend to address items below in those papers:
  - Items completed (e.g., revisions to inspection procedures and inspection manual chapters)
  - Items no longer being pursued (e.g., licensee self-assessments)
  - Items not requiring Commission approval per management Directive 8.13, "Reactor Oversight Process

SECY-18-0113

SECY-18-0113 Original Recommendations

- Develop a Combined Engineering Team Inspection (CETI) which combine Design Basis Assurance Inspection (DBAI) – "Teams" Inspection (21.M), 50.59, and heat sink procedures

- Recommend a 4-year engineering inspection cycle (with options of a 3-year or 5-year cycle)
  - Licensees receive one engineering inspection each year during the cycle. The CETI, and a Focused Engineering Inspection (FEI) (previously 21.N DBAI (program) inspection), with Fire Protection being one of the FEIs.

- Staff consider if Licensee Self-Assessments can be used in-lieu of one of the FEIs per cycle.

ROP Engineering SECY 18-0113		
Recommendation	**Factors to Consider** (recent experience, pandemic lessons learned, stakeholder feedback, etc.)	**Proposed MD 8.13 Requirement** (Commission approval, notification, or none)
Recommendations Requiring Commission Approval to Move Forward		
4 Year Engineering Inspection Cycle	Evaluate additional 2 years of engineering inspection experience	Commission Approval
Recommendations Requiring Commission Notification to Move Forward		
Focused Engineering Inspections (FEI)	Evaluate the effects and timing of the next inspection cycle	Commission Notification
CETI (Combined Engineering Team Inspection)	Evaluate the effects and timing of the next inspection cycle	Commission Notification
Recommendation No Longer Being Pursued by Staff		
Licensee Self-Assessment	Staff and industry no longer supporting	None – staff provided Commission notification that staff would no longer pursue

SECY-19-0067

SECY-19-0067 Original Recommendations

- Eliminate the four-quarter requirements for GTG inspection findings to remain open and instead close them upon completion of the supplemental inspection

- Revise the treatment of GTG PIs in the Action Matrix to be consistent with GTG findings by remaining a GTG input until supplemental inspection completion

- Revise sample sizes and resource estimates for baseline inspection procedures

- Revise PI&R inspection frequency from biennial to triennial

- Revise EP SDP to limit potential GTG findings to only planning standard functions that can impact public health and safety

- Revise the Enforcement Policy to support implementation of revised labels/descriptors for White and Yellow assessment inputs

![U.S.NRC United States Nuclear Regulatory Commission — Protecting People and the Environment]

SECY-19-0067 Original Additional Activities Already Completed By Staff

- Commission Notification:
  - Eliminate redundant "Summer Readiness" sample from IP 71111.01, Adverse Weather Protections

- Other items discussed in SECY-19-0067:
  - OPA reinforcement of existing guidance on press releases for White findings
  - Revise IP 95001 to clarify expectations related to inspection of causal evaluations
  - Clarify guidance in IMC 2515 related to modifications to inspection resource estimates
  - Revise SDP for beyond-design-basis events
  - Incorporate lessons learned and program efficiencies into Security baseline inspections
  - Evaluate ISFSI inspection program and make appropriate changes

ROP Enhancement SECY 19-0067		
Recommendation	**Factors to Consider** (recent experience, pandemic lessons learned, stakeholder feedback, etc.)	**Proposed MD 8.13 Requirement** (Commission approval, notification, or none)
Recommendations Requiring Commission Approval to Move Forward		
EP SDP revisions	Evaluate if any changes to the original EP assessment are necessary	Commission Approval
Treat GTG PIs consistent with GTG findings	Evaluate if any changes to our assessment of consistency between PIs and findings occurred	Commission Approval
Remove 4-quarter requirement	Evaluate if there are any changes to the original assessment of early closeout of GTG findings	Commission Approval
Revise biennial PI&R to triennial	Evaluate results of recently completed PI&R review and its effect on frequency, if any	Commission Approval
Revise description of White and Yellow Inputs	Evaluate if any changes to the original pros and cons for the changes to the Enforcement Policy are necessary	Commission Approval

ROP Enhancement SECY 19-0067		
Recommendation	**Factors to Consider** (recent experience, pandemic lessons learned, stakeholder feedback, etc.)	**Proposed MD 8.13 Requirement** (Commission approval, notification, or none)
Recommendations Requiring Commission Notification to Move Forward		
Revisions to sample sizes and resources for several baseline inspection procedures	Evaluate additional 2 years of ROP experience and recent and pandemic experiences	Commission Notification

Other Recommendations		
Recommendation	**Factors to Consider** (recent experience, pandemic lessons learned, stakeholder feedback, etc.)	**Proposed MD 8.13 Requirement** (Commission approval, notification, or none)
Eliminate redundant "Summer Readiness" sample from IP 71111.01, Adverse Weather Protections	Complete	Formal approval/notification not necessary
Press releases for White findings	Complete – OPA reinforced existing guidance with public affairs officers	Formal approval/notification not necessary
IP 95001 minor revisions	Complete – revised IP 95001 issued to clarify expectations related to inspection of causal evaluations	Formal approval/notification not necessary
Clarify guidance in IMC 2515 related to modifications to inspection resource estimates	Complete	Formal approval/notification not necessary
Revise SDP for beyond-design-basis events in IMC 0609, Appendix O	Complete	Formal approval/notification not necessary
Incorporate lessons learned and program efficiencies into Security baseline inspections	Review complete and changes Implemented	Formal approval/notification not necessary
Evaluate ISFSI inspection program and make appropriate changes	Review complete and changes implemented	Formal approval/notification not necessary
Revise requirement to notify Governors of transition to Column 2 using established protocols	Evaluate the appropriate language to address during the next guidance revision	Formal approval/notification not necessary

PI&R and CCI ROP Changes

- Staff completed a Problem Identification and Resolution (PI&R) comprehensive review in **(**ML20274A133)

  – PI&R report recommendations and management disposition:

    - Several options to enhance IP 71152 were proposed.

    - NRC decided to implement Option 1 (Current Inspection Requirements with Small Enhancements) and Option 3 (Qualitative Evaluation of PI&R Areas).

- Staff completed the CCI effectiveness review report recommendations and management disposition (ML20239A806)

  – WG Recommendations Approved to Move Forward:

    - Provide more detailed discussion of CCI insights and decisions in assessment letters.

    - CCI follow-up could be scoped into an existing planned supplemental inspection.

Near-term Path Forward

- Staff is evaluating the bases of the recommendations presented in the withdrawn Commission papers.

- Staff will seek internal and external stakeholder feedback. Will discuss timeline in a future ROP Monthly meeting:
  – New information to be considered, if needed, to update the bases
  – Perspectives on relative importance/impact of the recommendations

Questions?