

ROP Enhancement Changes to Assessment Program

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Recommendations for Commission Approval

- SECY-22-0086 recommendations:
 - Eliminate 4-quarter requirement for inspection findings; findings are closed upon satisfactory completion of the appropriate supplemental inspection and no longer considered Action Matrix inputs
 - Revise treatment of greater-than-Green (GTG) performance indicators (PIs) so that they remain Action Matrix inputs until satisfactory completion of the appropriate supplemental inspection, even if the PI returns to Green

SRM-SECY-22-0086

The Commission has approved the staff's recommended Option 3, which will: 1) eliminate the minimum four-quarter requirement for greater-than-green inspection findings to remain as Action Matrix inputs, allowing them to be closed upon completion of the appropriate supplemental inspection; and 2) revise the treatment of greater-than-green performance indicators so that they remain Action Matrix inputs until completion of the appropriate supplemental inspection.

Implementation

- Revising IMC 0305 – Inspection Findings
 - **Start Date** for inspection findings remains the same, beginning of the quarter in which the issue was identified as an AV, NOV, FIN, or NCV. (Last day of quarter for quarterly integrated reports; date of exit or re-exit for all other inspections)
 - **Closure Date** – close on the date of the exit meeting, or re-exit, for a satisfactory supplemental inspection. Wait until issuance of the inspection report and assessment follow-up letter.
 - **Held open finding** – safety significant finding that remains open when a licensee does not meet the objectives of the supplemental inspection.
 - **Closure Date for held open finding** – date of supplemental inspection report and assessment follow-up letter (no change)

Implementation

- Revising IMC 0305 – Performance Indicators
 - **Treatment** – issue parallel PI finding with same color as the PI to act as the Action Matrix input (PI continues to be reported as normally calculated and reported). Parallel PI finding treated the same as inspection findings.
 - **Start Date** for parallel PI finding remains the same, beginning of the quarter in which the data were collected pushing the unit over the Green/White threshold.
 - **Closure Date, Held open finding, Closure Date for held open finding** – same treatment as inspection findings.

Implementation

- Question – how do we treat a licensee that continues to accrue hits to the PI when they satisfy objectives of the 95001 inspection?
 - If PI trips the White/Yellow threshold, licensee moves to Column 3, even if they moved back to Column 1 because of a satisfactory 95001 inspection.
 - If parallel PI finding closed to planned corrective actions, the NRC may do nothing until corrective actions implemented.
 - If corrective actions implemented, PI&R sample (semi-annual trend or annual) to determine if corrective actions ineffective (potential Criterion XVI violation, depends on causes of additional hits)
 - Deviation option always exists.

Implementation

- Question – How do we treat a White parallel PI finding if the PI turns Yellow before the supplemental inspection?
 - If PI trips the White/Yellow threshold, licensee moves to Column 3 with a Yellow parallel PI finding.
 - The White parallel PI finding would fall under the “double counting” rule since the hits that tripped the White threshold would also be counted towards the Yellow threshold. The White would no longer count as an Action Matrix input. It could be administratively closed under the double counting rule, or explained within the Action Matrix block as to why it does not count.

Questions?