



ROP Bi-Monthly Update to Discuss Centralized Corporate Inspections

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Public Workshop

- NRC facilitated public workshop to gather industry input/ideas in December 2023. (ML24004A161 – meeting summary)
- Focused on listening to industry input/ideas and established a timeline for NRC conclusions.

Discussion Areas

- What NRC inspections could be considered for corporate inspection?
- How issues/violations would be adjudicated?
- How would those inspections fit into the ROP?
- How would corporate inspections increase effectiveness and efficiencies?
- Unintended consequences?

Industry Initial Thoughts

- Industry has centralized many of its engineering and other support from each individual site into corporate entities to reduce costs and attain efficiencies. Industry has ideas on how the NRC could conduct inspections to accommodate the centralization of industry resources.
- Industry would like to have NRC inspectors conduct the most amount of inspection efforts at their corporate facility and then visit the site if warranted, with varying levels of effort between corporate and onsite discussed.
- Industry's view on how much of NRC time is spent on corporate programs, processes and procedures vary

NRC Initial Evaluation

- NRC's time spent on corporate processes, procedures and programs vary but are generally in the 5 to 10% range of total inspection time and is part of the inspection prep(not onsite).
- NRC considered centralized functions when developing and implementing current inspections(i.e, CGD, Cyber, 50.69, FFD, Site Access Authorization)
- NRC and licensees can continue to leverage technology to decrease burden on the industry resources from centralized locations during inspections (i.e. calls or video conference NRC team onsite with corporate resources supporting inspections).

NRC Initial Evaluation continued

- Each licensee has different corporate structure and there would be a lack of consistent inspections for those larger corporations vs. smaller corporations.
- NRC inspections at corporate facilities would not be performance based and would be programmatic and would not be conducted at each licensee, therefore might not follow the ROP. (commission approval may be required)

Proposed Recommendations

- NRC maintains the baseline inspection program as is, focused on licensee performance through risk informed sampling at each site under the ROP.
- NRC staff will continue to look for and consider the option of conducting (or partially conducting) inspections at corporate facilities whenever developing new inspections in the future.
- NRC staff will continue to look for ways to be efficient in the preparation of and conduct of inspections where they can.
- NRC staff will consider language to consider corporate consolidation of programs and ways to minimize unnecessary industry burden in IPs and IMCs that provide guidance on inspection development and implementation.

Steps completed and Next steps

- NRC staff evaluated options gathered during December 2023 workshop – input received from NSIR and the Regions – complete
- NRC management briefed on assessment and align on recommendations – January – March 2024- complete
- Inform Public and Industry of NRC's results in public meeting, allow industry to provide input – March 2024
- NRC staff finalize recommendations after assessing further industry input, if provided - TBD

Any
Questions

