

Advance Act ROP Changes ROP Bi-Monthly Meeting

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Purpose

- To give a summary of the Agency's response to Section 507 of the ADVANCE Act to date
- Train on the ROP revisions that will go into effect nominally on 1 July
 - Some revisions require Commission notification, and a 14 day wait period after that notification (ROP Revision SECY was delivered to the Commission on June 3, 2025 (SECY-25-0045)

Where is the ROP Going?

Answer: REBASELINE

1. Starting point is a review and revision of all Performances Indicators (PIs)
 - Working Group has been established and first meeting was on May 5, 2025
 - First Industry Public Workshop is on June 5
2. Rebaseline effort will begin in about August
 - All Baseline Inspections effort will be reviewed and revised (e.g. PI&R, Engineering, Security, Radiation Safety, etc.)

Expected Outcome

1. Additional PIs to replace direct inspection effort
2. Reduction in direct inspection effort as each baseline procedure is assessed
3. Fundamental changes to the ROP (e.g. how PIs are treated in the Action Matrix)
4. Commission Approval will be required for the recommended changes
5. Goal is to have revised ROP in place on January 1, 2027

Implementation – Inspection Samples

- No longer expected to inspect to nominal samples
- Reasonable instances to increase inspection samples above minimum:
 - Risk worth of the SSC or evolution
 - Current performance of the licensee
 - The work the sample will be replacing
- SRI or Team Inspection lead makes the decision, Branch Chief (BC) if single person inspection
- BC still approves going above max samples (and informs DD)
- For all licensees, regardless of Action Matrix Column
- Reference: IMC 2515 Appendix A
- Begins on 1 July

Implementation – Entrance and Exit Meetings

- Entrance meetings optional (coordinate with licensee) and minimal in time*
- Exit meetings – Can (and will most likely be) remote meetings. Exit can be Team lead with Licensing Manager, especially if no findings. * Minimize time and resources during exits
- Begins now

*Coordination with Licensees needed

Inspections – Revised format for Team Inspections

- Shifting to a one week onsite, one week remote for Team Inspections (with exception of CETI)
- Optimize time onsite the first week to complete all walkdowns, observations, and meet licensee staff contacts
- Second week of inspection is remote
- There may be good reasons to have an inspector(s) on site the second week (on site work not completed, minimum cost for travel, licensee requests it, etc.), but should be kept to minimum to complete the inspection
- Remote exit meeting
- IMC 2515 revision will be issued by July 1st and this will be phased in to be completed by December 2025

Comprehensive Engineering Team Inspection Staff Reduction

- CETI is being reduced from 7 to 6 personnel
- IP 71111.21M is being revised to adjust the scope and sample requirements as appropriate
- IP has a current inspection sample range of 19-38 samples with a resource estimate of 490 +/- 74 inspection hours. Change will reduce the sample range to 15-34 and resource estimate to 420 +/- 63
- IP revision is ready to be issued. Awaiting Commission notification in ROP Revision SECY
- One CETI already completed with 6 people
- No Engineering contract in FY2026
- Working group established to assist in Engineering Inspection scheduling nationwide

Dual Path Processing Revision

- Dual path guidance (for TE violations) has been revised in IMC 0612 Appendix B
- Dual path was not initially a part of the ROP but was put in place as a result of a couple of high visibility situations (Davis-Besse head degradation and Peach Bottom inattentive officers) in which agency action was held up while awaiting OI activity
- In both cases the decision was made to proceed with the ROP aspect of the issue given the public appearance that the agency was not responding to the issues while waiting on OI. This led to the development of dual path guidance for all issues, whether Green or GTG
- No longer done for findings that would screen to Green
- For GTG findings decision will be made leading up to the Enforcement Panel / SERP whether to pursue processing through ROP
- Status: IMC 0612 Appendix B issued on 5/27/2025

Review and Closure of LERs

- LERs do not have to be re-inspected in IP 71153 to close the LER in an Inspection Report
- Proposed Note in IP 71153: “If an event has already been inspected under a different IP, an event should not be re-inspected using IP 71153. The LER should be reviewed for accuracy and then closed in the quarterly integrated inspection report. It can be closed under IP 71153 and only the time used to review the LER should be charged”
- Proposed language: “Once the event has concluded and/or the cause of the issue has been determined, transition to the applicable IP (i.e., 71152 for root cause and corrective actions, 7111.04, “Equipment Alignment,” or 7111.15, “Operability Determinations and Functionality Assessments,” etc.) for follow-up, resolution and disposition”
- ADVANCE Act Section 507(d)(2)(A) states: “elimination of areas of duplicative or otherwise unnecessary activities”
- Status: IP 71153 proposed revision will be sent out for 30 day coming period in about 2 weeks

Inspection Preparation and Documentation Requests

- Documentation Requests:
 - Boiler plate documentation requests shall not be used.
 - **IMC 0620 States:**
 - “Requests for documents or information needed either to prepare for an inspection or during an inspection are to be reasonable and should not unnecessarily burden the licensee, vendor, or applicant”
 - “Inspectors should not normally request documents that already exist as NRC official records in ADAMS”
 - “For team inspections, the lead inspector or team leader should prepare a list of documents that are needed for the inspection ...”
 - “One accepted practice would be for the lead inspector or team leader to email the notification of inspection and request for information to the licensee, vendor, or applicant far enough in advance to allow for adequate preparations”
 - “However, if desired, a letter on the docket can be drafted. The purpose of this is to provide advance notification and avoid placing unnecessary burden on the licensee, vendor, or applicant”
 - **Revision to IMC 0620:** The Branch Chief responsible for the inspection shall review the initial documentation request to ensure it meets the IMC 0620 guidance

Inspection Preparation and Documentation Requests

- “The Library”
 - Located on ROP Digital City: [The LIBRARY: UFSAR and Plant Technical Specification Database](#)
 - The Site AA is responsible for updating these documents on The LIBRARY SharePoint site every after every refueling outage and in accordance with 10 CFR 50.71e
 - There will be an DRO/IRIB lead to oversee
 - Use the library for Tech Specs (and TS Bases) and FSARs
- Bottom line on documentation requests is that Team Lead will need to place more effort into preparation
- Time charged to HCM for Prep/Doc should only be for actual time spent on these areas
 - If you are working on other items during your prep week charge to those items or your overhead CAC. Don't charge to Prep/Doc

VLSSIR changes

Expansion of VLSSIR considerations

- **Applicability** has been revised
 - – Now applicable to open questions or issues involving the licensing basis, design basis, or regulatory requirements in which there is ambiguity
 - – More guidance and consideration of resource expenditure and when to use
- Process is Agency-wide and guidance is in respective oversight program IMCs

VLSSIR changes

- Revised definition and new VLSSIR background discussion in IMC 0612 and updated templates in IMC 0611
- Updated screening instructions in IMC 0612 Appendix B
 - Consider VLSSIR as an option throughout inspection and dispositioning process
 - IMC 2515 sets expectation that VLSSIR is considered with division director once HQ support of an issue reaches 16 hours
 - Revisit open issues each week following inspection to consider VLSSIR
- IMC 0611, 0612, 0612 App B issued on 5/27/2025

High Level VLSSIR Overview

Goal: Don't get stuck on very low safety/security significance issues - disposition and move on

Planned Direct Inspection Activities (on-site or virtual)	Time to Exit	Document Results and Issue Report
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Inspection Q&A

Most/all issues dispositioned or path to dispositioning is clear

Inspector and BC awareness of issues involving ambiguity and whether to continue, stop, or VLSSIR

For issues not yet dispositioned:

- Weekly review to determine whether resources to resolve are in Agency's interests: continue, stop, or VLSSIR

Consider VLSSIR When:

- Issue involves ambiguity and may not be quickly resolved
- Additional resources to resolve may not be in the Agency's interests

Inspection Manual Chapter Changes

- The changes covered in this training are reflected in recent updates to IMCs:
- 2515 – exit/entrance meetings, inspect to min samples, and consider travel savings for second onsite week
- 2515 App A – inspect to min samples
- 2515 App D- RCS leakage tracking
- 0308 Attachment 2- inspect to min samples
- 0611- VLSSIR guidance, new critically reviewed definition
- 0612 and 0612 App B- VLSSIR guidance

What's next?

- Complete the work on revising the ROP Performance Indicators
 - Conduct workshops with industry
 - Leverage INPO Indicators
 - Inspector ideas: <https://forms.office.com/g/vAh8irbWxE>
- Re-baselining of ROP baseline inspection procedures
 - Consider inspection sample changes based on potential new PIs and inspector feedback
 - Will begin at about August 2025
 - All baseline programs will be reviewed
- Efficiencies in 4-part write ups (Implement 1/1/2026)
 - Reduction in green and SL-IV violation write ups
 - Will be accomplished by limiting fields where text can be placed in RPS

ROP Revision SECY

- Informs the Commission of actions we are taking
- Has the following Recommendations that the Commission must approve:
 - Assessment Program:
 - The staff recommends revising the treatment of licensee-identified White inspection findings such that they are not considered as Action Matrix inputs, yet they will still require inspection for closure. This change would further encourage licensees to identify and correct risk-significant issues
 - The staff also recommends revising the Action Matrix criteria so that multiple White Action Matrix inputs in Column 2 of the Action Matrix do not aggregate to result in assessment in Column 3
 - The staff also recommends suspending the Agency Action Review Meeting (AARM) unless a licensee meets the MD 8.14 criteria
 - Cross-Cutting Issues Program: The staff recommends simplifying the Cross Cutting Issues program to characterize inspection findings by cross-cutting theme rather than by cross cutting aspect, thereby reducing the characterization options from 23 to 3. This change would reduce subjectivity and decrease the use of NRC inspector and licensee resources to determine the most appropriate causal factor for the finding
 - NRC-Developed Power Reactor Initial Operator Licensing Examinations: The staff recommends removing the requirement from NUREG-1021 for each NRC region to write at least one power reactor initial operator licensing examination per year

Questions?