



Proposed Enhancements to the Assessment Process

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Introduction

- Purpose

Reach a common understanding on proposed changes to the Reactor Oversight Process

- Approach

- Start with a discussion of what we do currently to ensure common understanding
- Follow with a discussion of the proposed change



Option G - Assessment

- Framework of MC 0305, “Operating Reactor Assessment Program,” remains largely unchanged
- Adjust the cross-cutting aspects to more closely align with what is important to safety culture
- Include outputs from the allegation and traditional enforcement processes as inputs into the assessment process



Current Criteria for Substantive Cross-Cutting Issues

PROBLEM IDENTIFICATION & RESOLUTION	HUMAN PERFORMANCE	SAFETY CONSCIOUS WORK ENVIRONMENT
<ul style="list-style-type: none"> • Identification • Evaluation • Corrective Action 	<ul style="list-style-type: none"> • Personnel • Resources • Organization 	<p>“An environment in which employees feel free to raise safety concerns ... without fear of retaliation.”</p>
<p>More than 3 findings with this aspect</p> <p>AND</p> <p>The causal factors have a common theme.</p> <p>AND</p> <p>The NRC has a concern with scope of efforts or progress in addressing this area’s performance deficiency.</p>	<p>More than 3 findings with this aspect</p> <p>AND</p> <p>The causal factors have a common theme.</p> <p>AND</p> <p>The NRC has a concern with scope of efforts or progress in addressing this area’s performance deficiency.</p>	<p>The agency has previously engaged the licensee via a meeting or docketed correspondence regarding a potential or actual SCWE concern or issue.</p>



Proposed Aspects for Cross-Cutting Areas

PROBLEM IDENTIFICATION & RESOLUTION	HUMAN PERFORMANCE	SAFETY CONSCIOUS WORK ENVIRONMENT
<ul style="list-style-type: none"> • Corrective Action Program • Operating Experience • Self and Independent Assessment 	<ul style="list-style-type: none"> • Decision Making • Resources • Work Control • Work Practices 	<ul style="list-style-type: none"> • Preventing and Detecting Retaliation • Willingness to Raise Concerns



Proposed Criteria for Substantive Cross-Cutting Issues

PROBLEM IDENTIFICATION & RESOLUTION	HUMAN PERFORMANCE	SAFETY CONSCIOUS WORK ENVIRONMENT
<p>More than 3 findings with this aspect</p> <p>AND</p> <p>The causal factors have a common theme.</p> <p>AND</p> <p>The NRC has a concern with scope of efforts or progress in addressing this area's performance deficiency.</p>	<p>More than 3 findings with this aspect</p> <p>AND</p> <p>The causal factors have a common theme.</p> <p>AND</p> <p>The NRC has a concern with scope of efforts or progress in addressing this area's performance deficiency.</p>	<p>Any item* with this aspect</p> <p>AND</p> <p>The NRC has a concern with scope of efforts or progress in addressing this area's performance deficiency.</p>

In this context, "item" includes any of the following:

- An inspection finding with a cross-cutting aspect in safety conscious work environment;
- A chilling effect letter; or
- An enforcement action involving discrimination.



Components of Safety Culture

- Supplemental Inspections will consider
 - Those components that are associated with the cross-cutting areas
 - Continuous Learning Environment
 - Safety Conscious Work Environment Policies
 - Safety Policies
 - Accountability
 - Organizational Change Management



Option G – Follow-up

- Recurring substantive cross-cutting issue
 - Current process – NRC may request:
 - Licensee provide a response at the next annual public meeting;
 - Licensee provide a written response; or
 - A separate meeting with the licensee to discuss the issue.
 - Proposed revision to MC 0305 - Add an option to allow the NRC to request the licensee have an assessment of safety culture performed



Licensee Response Column

- Licensee Action (No Change) – Licensee corrective action
- NRC Inspection – Baseline inspection program
 - Enhance Inspection Procedure 71152, “Identification and Resolution of Problems”
- Regulatory Action (No change) - None



Regulatory Response Column

- Licensee Action (No change) – Licensee root cause evaluation and corrective action with NRC oversight
- NRC Inspection – Baseline and supplemental IP 95001
 - Enhance Inspection Procedure 95001, “Inspection for One or Two White Inputs in a Strategic Performance Area”
- Regulatory Action (No Change) – Supplemental inspection only



Regulatory Response Column

Supplemental Inspection Procedure 95001

- Inspection Objectives (No Change)
 - To provide assurance that the root causes and contributing causes of risk significant performance issues are understood
 - To provide assurance that the extent of condition and extent of cause of risk significant performance issues are identified
 - To provide assurance that licensee corrective actions to risk significant performance issues are sufficient to address the root and contributing causes, and to prevent recurrence



Regulatory Response Column

Supplemental Inspection Procedure 95001

- Enhance the inspection requirements and inspection guidance to verify that the licensee's root cause, extent of condition, and extent of cause evaluation appropriately considered safety culture components
- Resource Estimate (No Change)
 - Between 16 and 40 man-hours to complete for each White issue



Degraded Cornerstone Column

- Licensee Action (No change) – Licensee cumulative root cause evaluation with NRC oversight
- NRC Inspection – Baseline and supplemental Inspection Procedure 95002
 - Enhance Inspection Procedure 95002, “Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area”



Degraded Cornerstone Column

Supplemental Inspection Procedure 95002

- Inspection Objectives (Current)
 - To provide assurance that the root causes and contributing causes are understood for individual and collective risk significant performance issues
 - To independently assess the extent of condition and the extent of cause for individual and collective risk significant performance issues



Degraded Cornerstone Column

Supplemental Inspection Procedure 95002

- Inspection Objectives (Current)
 - To provide assurance that licensee corrective actions to risk significant performance issues are sufficient to address the root and contributing causes, and to prevent recurrence
- Inspection Objectives (Proposed Addition)
 - To independently determine if the components of safety culture caused or contributed to the risk significant performance issues



Degraded Cornerstone Column

Supplemental Inspection Procedure 95002

- Enhance the inspection requirements and inspection guidance to support NRC inspectors independently determining if the components of safety culture caused or contributed to the risk significant performance issues
- Resource Estimate
 - Currently between 40 and 240 man-hours to complete
 - Some increase in average level of effort expected



Degraded Cornerstone Column

- Regulatory Action (Current)
 - Supplemental inspection only
- Regulatory Action (Proposed Addition)
 - Add an option to allow the NRC to request the licensee have an independent assessment of safety culture performed in the event that the NRC identified, and the licensee did not recognize, that one or more components of safety culture caused or contributed to the risk significant performance issues



Multiple/Repetitive Degraded Cornerstone Column

- Licensee Action (Current) – Licensee performance improvement plan with NRC oversight
- Licensee Action (Proposed Addition) – Licensee has an independent assessment of safety culture performed
- NRC Inspection – Baseline and supplemental IP 95003
 - Enhance Inspection Procedure 95003, “Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input”



Multiple/Repetitive Degraded Cornerstone Column

Supplemental Inspection Procedure 95003

- Inspection Objectives (Current)
 - To provide the NRC additional information to be used in deciding whether continued operation of the facility is acceptable and whether additional regulatory actions are necessary to arrest declining plant performance
 - To provide an independent assessment of the extent of risk significant issues to aid in the determination of whether an unacceptable margin of safety exists



Multiple/Repetitive Degraded Cornerstone Column

Supplemental Inspection Procedure 95003

- Inspection Objectives (Current)
 - To independently assess the adequacy of the programs and processes used by the licensee to identify, evaluate, and correct performance issues
 - To provide insight into the overall root and contributing causes of identified performance deficiencies
 - To determine if the NRC oversight process provided sufficient warning to significant reductions in safety



Multiple/Repetitive Degraded Cornerstone Column

Supplemental Inspection Procedure 95003

- Inspection Objectives (Proposed Revision)
 - To provide the NRC additional information and an independent assessment of the licensee's safety culture to aid in the determination of whether continued operation of the facility is acceptable and whether additional regulatory actions are necessary to arrest declining plant performance



Multiple/Repetitive Degraded Cornerstone Column

Supplemental Inspection Procedure 95003

- Enhance the inspection requirements and inspection guidance to support NRC inspectors independently assessing the licensee's safety culture
- Resource Estimate
 - Currently a three-week onsite inspection effort that is estimated at 1,740 hours of direct inspection effort
 - Anticipated increase in level of effort between 10 and 20 percent



Multiple/Repetitive Degraded Cornerstone Column

- Regulatory Action (No Change)
 - Confirmatory Action Letter (CAL)
 - Order
 - 10 CFR 2.204 Demand for Information (DFI)
 - 10 CRR 50.54(f) Letter



Summary

Proposed Revisions to the ROP Assessment Process

- Treatment of Cross-Cutting Issues
- Follow-up Action