

COMMISSION REQUEST

- Review the use of Performance Indicators in the Reactor Oversight Process to ensure that the PIs provide meaningful insight into aspects of plant operation that are important to safety.

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- Review the initial implementation of the significance determination processes (SDPs), and assess the technical adequacy of the SDP to contribute to the ROP.

RESPONSE: PIs

- **Current PIs do provide meaningful insight into plant performance.**
- **The numerical values for the white/yellow and yellow/red thresholds for initiating events and mitigation system PIs are not meaningful. They should be revised.**

RESPONSE: PIs (CONT'D)

- **Definitions of terms such as “unavailability” should be consistent among agency activities.**
- **Unreliability should be a PI.**
- **Consider other related work, such as reliability studies, when assessing need to revise and develop new PIs.**

RESPONSE: SDPs

- The most pressing need is to improve the SDP tools.
- The technical adequacy of risk-based SDPs depends on the availability and quality of a relevant probabilistic risk assessment (PRA).

RESPONSE: SDPs

- **Threshold values for risk-based SDPs are appropriate.**
- **Some SDPs are incomplete and some, such as fire protection, are overly subjective.**
- **SDPs for at-power situations are meaningful.**

RESPONSE: SDPs

- **An SDP based on low-power and shutdown PRAs or other shutdown management tools is needed.**
- **Documented review of the SDP worksheets and Simplified Plant Analysis Risk (SPAR) models is necessary for public confidence.**

PIs and SDPs

- PIs and SDPs and the corresponding equivalency of the combination of findings in the action matrix have not been well documented.

PIs and SDPs

- **Formal decision analysis could be helpful in making the selection of thresholds and the action matrix more objective and scrutable.**

CONCLUSIONS

- **The ROP is an evolving process.**
- **The staff has done an excellent job establishing the basic framework.**
- **The ROP is more objective and understandable than the former oversight process.**