IMC 0307 APPENDIX A

REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT METRICS

1. PERFORMANCE INDICATOR (PI) PROGRAM METRICS

PI-1 Reliability of PI Data

Definition:Independently verify PIs using Inspection Procedure (IP) 71151, PI Verification. Annually, count the number of PIs that either (a) result in a crossed threshold based on a data correction by the licensee (as noted in the resultant inspection report), or (b) have been determined to be discrepant by the staff in accordance with IP 71150, Discrepant or Unreported Performance Indicator Data.

Criteria: Expect few occurrences (less than 3).

Lead: Regions, NRR/DIRS

Goals Supported: Objective, Predictable, Open

PI-2 Consistent Interpretation of PI Guidance

Definition: Annually, count the number of new frequently asked questions (FAQs).

Criteria: Expect low numbers (less than 18).

Lead: NRR/DIRS

Goals Supported: Understandable, Objective, Predictable, Open

PI-3Timely Indication of Declining Plant Performance

Definition:Annually, track PIs that cross multiple thresholds (e.g., green to yellow or white to red). Evaluate and characterize these results to allow timely indication of declining performance.

Criteria: Expect few occurrences (less than 3).

Lead: NRR/DIRS

Goals Supported: Risk-Informed, Effective

PI-4PI Program Provides Insights to Help Ensure Plant Safety and/or Security

Definition: Survey external and internal stakeholders asking whether the PI Program provides useful insights, particularly when combined with the inspection program, to help ensure plant safety and/or security.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Risk-Informed, Open

PI-5Timely PI Data Reporting and Dissemination

Definition:Within 5 weeks of the end of each calendar quarter, track (count) late PI postings on the NRCs external Web site. Also note the number of late submittals from licensees that did not meet the 21-day timeliness goal.

Criteria: Expect few occurrences (less than 3 late Web postings and less than 5 late PI submittals).

Lead: NRR/DIRS

Goals Supported: Effective, Open, Predictable

PI-6Stakeholders Perceive Appropriate Overlap Between the PI Program and Inspection Program

Definition:Survey external and internal stakeholders asking if appropriate overlap exists between the PI program and the inspection program.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Open

PI-7 Clarity of Performance Indicator Guidance

Definition: Survey external and internal stakeholders asking if IMC 0608, “Performance Indicator Program,” and NEI 99-02, Regulatory Assessment Performance Indicator Guideline, provide clear guidance regarding performance indicators.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Understandable, Open, Objective, Predictable

II. INSPECTION PROGRAM METRICS

IP-1Inspection Results Documented In Accordance With Requirements

Definition: Audit selected inspection reports to verify compliance with program requirements (IMC 0612, “Power Reactor Inspection Reports”). Report identified weaknesses and corrective actions taken or planned.

Criteria: None; trend only.  Report on audit results, including any recommended improvements in guidance and/or training to address identified concerns.

Lead: NRR/DIRS

Goals Supported: Objective, Risk-Informed, Predictable, Understandable, Open, Effective

IP-2Completion of Baseline Inspection Program

Definition: Annual completion of baseline inspection program.

Criteria: Expect satisfactory completion of the baseline inspection program as defined in IMC 2515, Light‑Water Reactor Inspection Program - Operations Phase, in all regions.

Lead: NRR/DIRS, Regions

Goals Supported: Predictable, Effective

IP-3Inspection Reports Are Timely

Definition: Obtain data from the Reactor Program System (RPS) on the total number of reports issued and the number issued within timeliness goals as stipulated in IMC 0612, Power Reactor Inspection Reports.

Criteria: Expect 90 percent of inspection reports to be issued within program's timeliness goals.

NOTE: For inspections not conducted by a resident inspector, inspection completion is normally defined as the day of the exit meeting. For resident inspector and integrated inspection reports, inspection completion is normally defined as the last day covered by the inspection report.

Lead: NRR/DIRS, NSIR, Regions

Goals Supported: Effective, Open, Predictable

IP-4Temporary Instructions (TIs) Are Completed Timely

Definition: Audit the time to complete TIs by region or Office. Compare the completion status in RPS to TI requirements. Report by region or Office the number of TIs closed within goals.

Criteria: Expect all TIs to be completed within TI timeliness requirements.

Lead: NRR/DIRS, NSIR, Regions

Goals Supported: Effective, Predictable

IP-5Inspection Reports Are Relevant, Useful, and Written in Plain Language

Definition: Survey external and internal stakeholders asking whether the information contained in inspection reports is relevant, useful, and written in plain English.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Understandable, Open

IP-6Inspection Program Effectiveness and Adequacy in Covering Areas Important to Plant Safety and/or Security

Definition: Survey external and internal stakeholders asking whether the inspection program adequately covers areas that are important to plant safety and/or security and is effective in identifying and ensuring the prompt correction of performance deficiencies.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Risk-Informed, Open

IP-7Analysis of Baseline Inspection Procedures

Definition: Annually, review each baseline inspection procedure to determine its effectiveness and contribution to the overall effectiveness of the baseline inspection program. The objectives of the review are: (1) to determine if changes in scope, frequency, or level of effort are needed based on recent experience, (2) to determine if a change to the estimated hours for completion is needed, (3) to define or change what constitutes minimum completion of each inspectable area, if needed, and (4) to critically evaluate all of the inspectable areas together along with the PI program to ensure that the inspectable areas are adequately monitored for safety performance. In addition, a more detailed review and realignment of inspection resources will be performed at least biennially in accordance with Appendix B to this Chapter. The focus of this effort is to adjust existing inspection resources to improve the effectiveness of the inspection program in identifying significant licensee performance deficiencies.

Criteria: Analysis of inspection procedure effectiveness should be performed for each of the baseline inspection procedures annually.  Inspection procedure review criteria discussed in IMC 0307 Appendix B, “Reactor Oversight Process Realignment,” can be used as one method for performing an inspection procedure effectiveness review.  Other self-assessment initiatives to determine inspection procedure effectiveness are also acceptable. Summarize and evaluate the individual inspection procedure reviews and propose program adjustments as necessary to address identified areas for improvement. Provide basis for any meaningful increase or decrease in procedure scope, frequency, or level of effort as a result of the review.

Lead: NRR/DIRS

Goals Supported: Effective, Risk-Informed

III. SIGNIFICANCE DETERMINATION PROCESS (SDP) METRICS

SDP-1The SDP Results Are Predictable and Repeatable and Focus Stakeholder Attention on Significant Safety Issues

Definition: Annually, audit a representative sample (up to four per region) of inspection findings against the standard criteria set forth in IMC 0609, Significance Determination Process, and its appendices. To the extent available, samples should include potentially greater-than-green findings that were presented to the Significance Determination Process/Enforcement Review Panel (SERP). Findings should contain adequate detail to enable an independent auditor to trace through the available documentation and reach the same significance color characterization.

Criteria: Expect at least 90 percent of SDP outcomes determined to be predictable and repeatable. Any SDP outcomes determined to be non-conservative will be evaluated and appropriate programmatic changes will be implemented.

Lead: NRR/DRA

Goals Supported: Risk-Informed, Predictable

SDP-2 SDP Outcomes Are Risk-Informed and Accepted by Stakeholders

Definition:Track the total number of appeals of final SDP results for white, yellow, or red inspection findings.

Criteria: Expect few successful appeals (less than 3) of SDP significance that result in a final determination being overturned across all regions for any white, yellow, or red inspection findings. All successful appeals will be assessed to determine causal factors and to recommend process improvements.

Lead: Regions, NRR/DIRS

Goals Supported: Risk-Informed, Objective, Predictable

SDP-3 Inspection Staff Is Proficient and Find Value in Using the SDP

Definition: Survey internal stakeholders using specific quantitative survey questions that focus on training, effectiveness, and efficiency.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Understandable, Risk-Informed

SDP-4The SDP Results in an Appropriate Regulatory Response and Focus Attention on Significant Performance Issues

Definition: Survey external and internal stakeholders asking if the SDP results in an appropriate regulatory response and focus attention on significant performance issues.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported**:** Understandable, Objective, Risk-Informed, Predictable, Open

SDP-5 The Resources (Direct Charges and Support Activities) Expended Are Appropriate

Definition: Track the percentage of total resource expenditures attributed to SDP activities to determine the effort expended by the regions in completing SDP evaluations as a percentage of the total regional direct inspection effort.

Criteria: Total SDP expenditures should not exceed 10 percent of the total regional direct inspection effort (DIE) with a stable or declining trend.

Lead: NRR/DIRS

Goals Supported: Effective, Predictable

SDP-6Final Significance Determinations Are Timely

Definition: Conduct a quarterly audit to identify the total number of inspection items finalized as greater than green that were under review for more than 90 days since:

1. the date of initial licensee notification of the preliminary significance in an inspection report, or
2. the item was otherwise documented in an inspection report as an apparent violation or finding pending completion of a significance determination and not counted in the above category.

Criteria: Expect at least 90 percent of all SDP results that are counted per the criteria above should be finalized within 90 days. All issues greater than 90 days will be assessed to determine causal factors and to recommend process improvements.

Lead: NRR/DIRS

Goals Supported: Effective, Open, Predictable

IV. ASSESSMENT PROGRAM METRICS

AS-1 Actions Are Determined by Quantifiable Assessment Inputs (i.e., PIs and SDP Results) and are Commensurate With the Risk of the Issue and Overall Plant Risk

Definition: Annually, track the number of deviations from the Action Matrix. Evaluate the causes for these deviations and identify changes to the ROP, if any, to improve the guidance documents.

Criteria: Expect few new deviations (less than 3).

Lead: NRR/DIRS

Goals Supported: Objective, Risk-Informed, Predictable, Open

AS-2 The Number and Scope of Additional Actions Recommended as a Result of the Agency Action Review Meeting (AARM) Beyond Those Actions Already Taken Are Limited

Definition: Review the results of the Agency Action Review Meeting (AARM).

Criteria: Expect few additional actions (less than 2).

Lead: NRR/DIRS

Goals Supported: Understandable, Predictable, Objective

AS-3 Assessment Program Results (Assessment Reviews, Assessment Letters and Public Meetings) Are Completed in a Timely Manner

Definition: Track the number of instances in which the timeliness goals stipulated in IMC 0305, Operating Reactor Assessment Program, were not met for: (1) the conduct of quarterly, mid-cycle, and end-of-cycle reviews; (2) the issuance of assessment letters; and (3) the conduct of public meetings.

Criteria: Expect 95 percent of timeliness goals be met for each of the 3 assessment activities noted in the definition.

Lead: Regions, NRR/DIRS

Goals Supported: Effective, Open, Predictable

AS-4 ROP Response to Performance Issues Is Timely

Definition: Count the number of days between issuance of an assessment letter discussing an issue of more than very low safety significance and completion of the supplemental inspection (by exit meeting date, not issuance of the inspection report). Note that this metric is intended to evaluate the effectiveness of the program, which relies on timely implementation by both the NRC and the industry.

Criteria: Expect a stable or declining trend.

Lead: Regions, NRR/DIRS

Goals Supported: Effective, Predictable

AS-5 NRC Takes Appropriate Actions To Address Performance Issues

Definition: Survey external and internal stakeholders asking whether the NRC takes appropriate actions to address performance issues for those plants outside the Licensee Response Column of the Action Matrix.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Understandable, Open

AS-6 Assessment Letters Are Relevant, Useful, and Written in Plain Language

Definition: Survey external and internal stakeholders asking whether the information contained in assessment letters is relevant, useful, and written in plain English.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Understandable, Effective, Open

AS-7 Significant Degradations in Plant Performance Allow for Adequate Agency Engagement of the Licensees Prior to Unacceptable Performance

Definition: Annually, track the number of instances in which plants enter either the IMC 0350 process or the Unacceptable Performance Column of the ROP Action Matrix from the Licensee Response or Regulatory Response Column. Consistent with the ROP basis as described in SECY-99-007, this metric is designed to ensure that the ROP provides adequate margin in the assessment of licensee performance so that appropriate licensee and NRC actions are taken before unacceptable performance occurs.

Criteria: Expect no instances in which significant degradations in plant performance cause a prompt change in Agency response as described above. Evaluate and provide a qualitative explanation of each instance in which this occurs.

Lead: NRR/DIRS

Goals Supported: Risk-Informed, Effective, Predictable

V. OVERALL REACTOR OVERSIGHT PROCESS (ROP) METRICS

O-1 Stakeholders Perceive the ROP To Be Predictable and Objective

Definition: Survey external and internal stakeholders asking if ROP oversight activities are predictable (i.e., controlled by the process) and reasonably objective (i.e., based on supported facts, rather than relying on subjective judgment).

Criteria: Expect stable or increasing positive perception over time.

Lead: NRR/DIRS

Goals Supported: Objective, Predictable, Effective, Open

O-2Stakeholders Perceive the ROP To Be Risk-informed

Definition: Survey external and internal stakeholders asking if the ROP is risk-informed, in that actions and outcomes are appropriately graduated on the basis of increased significance.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Risk-Informed, Effective, Open

O-3Stakeholders Perceive the ROP To Be Understandable

Definition: Survey external and internal stakeholders asking if the ROP is understandable and if the processes, procedures, and products are clear and written in plain English.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Understandable, Effective, Open

O-4Stakeholders Perceive That the ROP Provides Adequate Regulatory Assurance That Plants Are Operated and Maintained Safely and Securely

Definition: Survey external and internal stakeholders asking if the ROP provides adequate regulatory assurance, when combined with other NRC regulatory processes, that plants are being operated and maintained safely and securely.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Open

O-5Stakeholders Perceive the ROP To Be Effective (e.g., High Quality, Efficient, Realistic, and Timely)

Definition: Survey external and internal stakeholders asking whether NRC actions related to the ROP are high quality, efficient, realistic, and timely.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Open

O-6Stakeholders Perceive That the ROP Ensures Openness and That There are Sufficient Opportunities for Public Participation in the Process

Definition: Survey external and internal stakeholders asking if the ROP ensures openness and provides sufficient opportunities for the public to participate in the regulatory process.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Open, Effective

O-7Stakeholders Perceive the NRC To Be Responsive to its Inputs and Comments

Definition: Survey external and internal stakeholders asking if the NRC is responsive to stakeholder inputs and comments on the ROP.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Open, Effective

O-8Stakeholders Perceive That the ROP Is Implemented as Defined

Definition: Survey external and internal stakeholders asking if the ROP has been implemented as defined by program documents.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Predictable, Understandable, Open

O-9Stakeholders Perceive That the ROP Does Not Result in Unintended Consequences

Definition: Survey external and internal stakeholders asking if the ROP results in unintended consequences (i.e., undesirable results that were not planned or anticipated and may adversely affect reactor safety or the overall effectiveness of the ROP).

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DIRS

Goals Supported: Effective, Open

O-10Stakeholders Perceive That the ROP Adequately Addresses Safety Culture and Focuses Attention Appropriately

Definition: Survey external and internal stakeholders asking whether safety culture is adequately incorporated into the ROP to help in identifying licensee safety culture weaknesses and focusing licensee and NRC attention appropriately.

Criteria: Expect stable or increasingly positive perception over time.

Lead: NRR/DRA, NRR/DIRS

Goals Supported: Effective, Open

O-11Analysis of NRCs Responses to Significant Events

Definition:Review reports from incident investigation teams (IITs) and augmented inspection teams (AITs) to collect lessons learned regarding ROP programmatic deficiencies (i.e., did the baseline inspection program inspect this area? did the SDP accurately characterize resultant findings?). IITs already have the provision to determine NRC program deficiencies. AITs will be reviewed by NRR/DIRS to identify any weaknesses.

Criteria: Expect no major programmatic deficiencies.

Lead: NRR/DIRS

Goals Supported: Effective, Predictable

O-12 Analysis of Inspection Hours and Resource Expenditures

Definition: Annually, collect and analyze resource data (e.g., direct inspection effort, preparation/documentation, and plant status hours) for Baseline, Supplemental/Plant-Specific, and Safety Issues Inspections, and other ROP activities.

Criteria: (1) Significant deviations are not expected on an annual basis. Explore reasons for any deviations that may be evident.

(2) Track and trend resource usage for the baseline inspection program and supplemental/plant-specific inspections. Analyze causes for any significant departure from established trend.

(3) Track and trend resource usage for preparation, documentation, and other ROP activities, and assess the effects on budgeted resources.

NOTE: This metric is intended primarily for tracking and trending resource usage for the ROP. The results are used to improve the efficiency and effectiveness of the ROP and to make management and budget decisions. A detailed ROP resource analysis is included in the annual ROP self-assessment Commission paper.

Lead: NRR/DIRS

Goals Supported: Effective, Predictable

O-13Analysis of Resident Inspector Demographics and Experience

Definition: Annually, collect and analyze data in order to determine the relevant inspection experience of the resident inspector (RI) and senior resident inspector (SRI) population. The following four parameters will be measured and analyzed for both RIs and SRIs to ensure that the NRC maintains a highly qualified resident inspection staff:

1. NRC time - the total time the individual has accumulated as an NRC employee.
2. Total resident time - the total time the individual has accumulated as an RI or SRI.
3. Current site time - the total time the individual has spent as an RI or SRI at the current site.
4. Relevant non-NRC experience - the total time the individual has gained relevant nuclear power experience outside of the NRC. Examples of relevant non-NRC experience are operation,

engineering, maintenance, or construction experience with commercial nuclear power plants, naval shipyards, Department of Energy facilities, and/or the U.S. Navy nuclear power program.

Criteria: None; trend only. Provide reasons for any meaningful increase or decrease in any of these resident demographic metrics.

NOTE: This metric is intended primarily for tracking and trending resident inspection experience. The results are used to make any necessary modifications to the RI and/or SRI programs in order to attract and retain highly qualified inspectors to the respective programs. A detailed resident demographic and staffing analysis is included in the annual ROP self-assessment Commission paper.

Lead: NRR/DIRS with assistance from HQ and regional HR staff

Goals Supported: Effective, Predictable

O-14Analysis of Site Staffing

Definition: Annually, collect and analyze data in order to measure the permanent inspector staffing levels at each of the reactor sites for both RIs and SRIs in order to evaluate the agencys ability to provide continuity of regulatory oversight.

Criteria: Expect the staffing levels to be at least 90 percent program-wide. Any single site that falls below 90 percent will be individually evaluated. Provide reasons for any meaningful increase or decrease in the inspector staffing level at reactors sites.

NOTE: Inspectors assigned to the site permanently or through a rotation with a minimum duration of 6 weeks shall be counted. Inspectors on 6 week or longer rotational assignments will be identified as such. Inspectors assigned to the site for less than six weeks will not be counted, but should be indicated as such. Additionally, the regions shall indicate sites where permanently assigned resident or senior resident inspectors are away from the site for an extended period of time (one continuous time period which is greater than 6 weeks). Only inspectors who have attained at least a basic inspector certification status, as defined by Appendix A to Inspection Manual Chapter 1245, shall be counted.

Data will indicate number of days a qualified resident and senior resident inspector are permanently assigned to the site during the year divided by the number of days in the year. Number of days spent on training; meetings away from the site; participation in team inspections; leave; or other temporary duties (e.g. acting for branch chiefs in his/her absence) will not be counted against the metric unless the absence exceed 6 continuous weeks.

Lead: Regions, NRR/DIRS

Goals Supported: Effective, Predictable

O-15Analysis of ROP Training and Qualifications

Definition: Annually, evaluate the implementation of IMC 1245, Qualification Program for the Office of Nuclear Reactor Regulation Programs, particularly as it pertains to ROP implementation.

Criteria: None; trend only. Summarize and evaluate the training accomplished over the previous year and propose program improvements as necessary to address noted concerns.

NOTE: This metric is intended primarily for tracking and trending the effectiveness of the ROP training and qualifications programs. An evaluation of training effectiveness is included in the annual ROP self-assessment Commission paper.

Lead: NRR/DIRS with assistance from regional staff

Goals Supported: Effective, Predictable, Understandable

O-16Analysis of Regulatory Impact

Definition: Annually, collect and analyze licensee feedback and develop a summary of regulatory impact forms that are critical of the ROP.

Criteria: None; trend only. Summarize and evaluate the feedback received and propose program improvements as necessary to address common concerns.

NOTE: This metric is intended primarily for tracking and trending regulatory impact. A detailed regulatory impact summary is included in the annual ROP self-assessment Commission paper.

Lead: NRR/DIRS with assistance from regional staff

Goals Supported: Effective, Open, Understandable

ATTACHMENT 1

Revision History for IMC 0307, Appendix A

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| --- | --- | --- | --- | --- |
| Commitment Tracking Number | Accession Number  Issue Date  Change Notice | Description of Change | Description of Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
| N/A | ML023650446  12/12/02 | Revised significantly to include a more detailed discussion of the role of inspectable and program area leads, the annual review of the baseline inspection program, and other aspects of the self-assessment program. The specific metrics for these roles were added to Appendix A. | None | N/A |
| N/A | ML033640661  12/12/03 | Revised to provide greater detail for documenting the results of the annual inspection procedures reviews, and some metrics in Appendix A were modified to better align with the operating plan metrics and other program commitments. | None | N/A |
| N/A | ML040150392  01/14/04 | Based on a decision at the DRP/DRS counterpart meeting held on December 17-18, 2003, metric IP-5 was revised to change the inspection report timeliness to 45 calendar days for all inspection reports, with exception of reactive inspection reports, which will stay at 30 days. | None | N/A |
| N/A | ML060110214  02/20/06 | Revised to support the new safety performance measures of the NRCs Strategic Plan, to better define the ROP goals and intended outcomes, and to consolidate and clarify several of the performance metrics. Completed 4 year historical CN search. | None | ML060110235 |

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| Commitment Tracking Number | Accession Number  Issue Date  Change Notice | Description of Change | Description of Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
| N/A | ML063050572  11/28/06 | Revised to measure the effectiveness of the safety culture enhancements to the ROP, to clarify expectations regarding the resident demographics and staffing metrics, and to include a discussion of the consolidated response to external survey questions. | None |  |
| N/A | 01/10/08  CN 08-002 | Revised to eliminate and consolidate several metrics, to separate Appendix A from the base IMC to serve as a stand-alone document, and to summarize and link to Appendix B on the ROP realignment process. | None | ML073510410 |
| W200800299 | ML090300596 03/23/09  CN 09-010 | Revised to address the Commission SRM dated June 30, 2008, to reflect the recently issued Strategic Plan for FY 2008 – 2013, to reincorporate the security cornerstone in the ROP self-assessment process, and some metrics were revised for clarification purposes while others were removed to eliminate redundancy or unnecessary burden. | None | ML090300620 |
|  | ML12355A458  03/27/13  CN 13-010 | Revised some of the metrics and/or their criteria to improve their usefulness in evaluating the effectiveness of the ROP, and to make the metrics more objective and measurable, as feasible. | None | ML12355A454;  Closed FBF 0307A-1670 (AS-7 change), 0307A-1760 (generic), and 0307-1703. |