

November 27, 2006

The Honorable Tom Davis  
Chairman, Committee on Government Reform  
United States House of Representatives  
Washington, D.C. 20515

Dear Mr. Chairman:

On behalf of the U.S. Nuclear Regulatory Commission (NRC) and in accordance with 31 U.S.C. 720, enclosed is the NRC's response to the recommendations made by the U.S. Government Accountability Office (GAO) in its report entitled "Nuclear Regulatory Commission: Oversight of Nuclear Power Plant Safety Has Improved, but Refinements Are Needed" (GAO-06-1029). If you have any questions or comments, please contact me.

Sincerely,

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Dale E. Klein

Enclosure:  
NRC Response to GAO Recommendations

cc: Representative Henry Waxman

Identical letter sent to:

The Honorable Tom Davis  
Chairman, Committee on Government Reform  
United States House of Representatives  
Washington, D.C. 20515  
cc: Representative Henry Waxman

The Honorable Susan Collins  
Chair, Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
Washington, D.C. 20510  
cc: Senator Joseph I. Lieberman

The Honorable George V. Voinovich  
Chairman, Subcommittee on Clean Air,  
Climate Change, and Nuclear Safety  
Committee on Environment and Public Works  
United States Senate  
Washington, D.C. 20510  
cc: Senator Thomas Carper

The Honorable Ralph M. Hall  
Chairman, Subcommittee on Energy  
and Air Quality  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, D.C. 20515  
cc: Representative Rick Boucher

The Honorable Joe Barton  
Chairman, Committee on Energy and Commerce  
United States House of Representatives  
Washington, D.C. 20515  
cc: Representative John D. Dingell

The Honorable James M. Inhofe  
Chairman, Committee on Environment  
and Public Works  
United States Senate  
Washington, D.C. 20510  
cc: Senator James M. Jeffords

The Honorable David M. Walker  
Comptroller General of the United States  
U.S. Government Accountability Office  
Washington, D.C. 20548  
cc: James E. Wells, GAO

The Honorable Rob Portman  
Director, Office of Management and Budget  
Washington, D.C. 20503

## NRC RESPONSE TO GAO RECOMMENDATIONS

In its report, "Nuclear Regulatory Commission: Oversight of Nuclear Power Plant Safety Has Improved, but Refinements Are Needed" (GAO-06-1029), the U.S. Government Accountability Office (GAO) made recommendations for improving the U.S. Nuclear Regulatory Commission's (NRC's) ability to identify declining safety performance at nuclear power plants before significant safety problems develop. Specifically, GAO recommended that the NRC:

1. Aggressively monitor; evaluate; and, if needed, implement additional methods or processes to increase the effectiveness of its efforts under the reactor oversight process (ROP) to assess safety culture at plants.
2. In addition to periodically evaluating the effectiveness of its safety culture efforts, NRC may also be able, through its performance indicator program, to develop specific indicators to measure important aspects of plants' safety culture. Trends in these performance indicators could be useful feedback to NRC on its safety culture activities. The indicators could also provide useful information to the public and other NRC stakeholders on the safety culture at plants.
3. In the absence of performance indicators or other performance metrics for plants' safety culture, make publicly available, through the ROP Web site, consolidated and comprehensive data on the plants that have substantive, open cross-cutting issues to provide a more comprehensive picture of plant performance and provide insights into aspects of the plants' safety culture that otherwise are not readily available on the Web site.

### NRC Response:

As noted in the GAO's report, the staff has taken significant actions to incorporate safety culture into the ROP. These efforts included: (1) implementing a multi-office ROP safety culture focus team to resolve implementation issues, to interface with internal and external stakeholders, and to evaluate and act on lessons learned; (2) revising guidance documents and inspection procedures to further define key safety culture aspects and prescribe when an independent assessment of a licensee's safety culture is warranted based on licensee performance; (3) conducting training for inspectors on the safety culture ROP changes; and (4) interacting with external stakeholders during the development phase, including the opportunity to provide comments on the draft ROP documents that incorporated the safety culture changes.

The staff is monitoring the implementation of the safety culture enhancements through the NRC safety culture focus team. An 18-month initial implementation period is under way, during which time the NRC staff will monitor and evaluate the effectiveness of the enhancements using performance metrics through its self-assessment process. We will determine the need to implement additional methods or processes to increase the effectiveness of the ROP based on the lessons learned during this initial implementation phase.

The NRC is revising Inspection Manual Chapter (IMC) 0307, "Reactor Oversight Process Self-Assessment Program," to add specific measures to determine the effectiveness of this important initiative. In support of this effort, we have added specific questions to the internal and external ROP surveys, which are currently being administered, in order to solicit feedback on the safety culture effort. The survey responses will be consolidated and analyzed, and the results will be presented in the annual performance metric report and discussed in the annual ROP self-assessment provided to the Commission for review.

NRC believes the annual ROP self-assessment process and performance metric report, versus the ROP performance indicator program, are better tools to gather and assess feedback on the safety culture enhancements. We will use these feedback processes to provide useful information to internal and external stakeholders, and make the ROP more efficient and effective at identifying declining licensee performance.

As a first step in the process, and as recommended by the GAO, we have added a Web page that presents consolidated and comprehensive data on the plants that have substantive, open cross-cutting issues. We plan further refinements to the ROP Web pages to more prominently highlight plants that have substantive cross-cutting issues to provide a more comprehensive picture of plant performance.