

September 18, 1992

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-92-284 - PERFORMANCE MEASURES

This is to advise you that, with limited exceptions, the Commission has not objected to the staff's proposed performance measures. The staff should incorporate the following comments and exceptions and submit the performance measures to the NRC's Congressional oversight committees and OMB:

1. If a specific measure on criminal investigations is needed, then the "Number of criminal referrals compared to the number of full-scale investigations opened by the Office of Investigations" should be modified to reflect the goal of protecting public health and safety rather than meeting a quota for criminal referrals. The following would be an appropriate substitution:

"Number of investigations affecting public health and safety completed and closed compared to the number of investigations affecting public health and safety that were pending at the beginning of the year plus the number of such investigations opened during the year."
2. The "Percent of review completed for each standard plant design application and major industry generic requirements document" should be modified to consider only those applications and submittals that are reasonably complete. This precludes holding the NRC accountable for reviews in which a submittal is incomplete.
3. The "Number of operator license examinations passed compared to number of operator license examinations administered" in its present form should not be used as a performance measure, since it reveals little or nothing about NRC's performance.

SECY NOTE: THIS SRM AND SECY-92-284 WILL BE MADE PUBLICLY AVAILABLE 10 WORKING DAYS FROM THE DATE OF THIS

SRM

4. The "Number of contaminated nonreactor sites and facilities remediated compared to the total number of contaminated sites and facilities planned for remediation" includes uranium mills, all license terminations, partial cleanups, and the Site Decommissioning Management Plan. If this measure is not intended to cover this broad an area, it should be written more specifically to reflect the particular sites intended. Sites and facilities should only be included if the NRC has sufficient data upon which to rely to measure NRC performance accurately.
5. The "Number of transportation incidents where releases have occurred compared to the total number of incidents reported" should be modified to include only transportation incidents involving NRC approved containers.

(EDO) (SECY Suspense: 10/9/92)

The following performance measures may be included in the current submittal, but the Commission requests further information, as described below:

1. The "Performance Indicators (Annual Industry Averages)" are listed as an "outcome" measure. The staff should determine whether these measures of power plant performance say anything about NRC performance. If not, they should be deleted. If so, then the link between power plant performance and NRC performance should be clearly articulated.
2. If the "Accident Incident Precursors" measure refers to the accident sequence precursor program, the same terminology should be used. If not, further explanation of this measure is needed. The same questions from item 6. above should be addressed concerning this measure.

(EDO) (SECY Suspense: 11/20/92)

At the earliest opportunity, the staff should develop performance measures which would reflect the contributions of the High Level Waste program and the Office of State Programs to the accomplishment of the NRC's mission for inclusion in the FY 1993 financial statement.

(EDO) (SECY Suspense: 9/1/93)

The proposed measures are of limited value without performance standards and criteria for determining when the standards are not

met. The staff should therefore, develop standards and implementation methods for each performance measure.

(EDO)

(SECY Suspense: 9/1/93)

Your "Revised Guidance on the Use of Performance Indicators" of November 28, 1989 stated:

NRC staff must be sensitive to inappropriate pressure from any source which causes licensee personnel at individual nuclear power plants to "manage the indicators" or to take any actions that are contrary to plant safety because of performance indicators, individually or as a set (such as inhibiting reactor trips).

A similar statement should be made with respect to these performance measures. Everyone at the NRC must resist any pressure to "manage the measures" or to take any action because of performance measures which is contrary to good regulation.

cc: The Chairman
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
Commissioner de Planque
OGC
OIG