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## **EXECUTIVE SUMMARY**

The Reactor Oversight Process (ROP) self-assessment program evaluates the overall success of the ROP being objective, risk-informed, understandable, and predictable as well as its success in meeting the agency's performance goals of maintaining safety; protection of the environment and the common defense and security; increasing public confidence; making NRC activities and decisions more effective, efficient, and realistic; and reducing unnecessary regulatory burden on stakeholders. On a periodic basis, the self-assessment program collects information from various sources, including the Reactor Program System (RPS), the inspection program, the ROP performance indicator (PI) program, additional industry level PIs, periodic independent audits, stakeholder surveys, and public comment. Based on this information, an assessment of ROP success in the programmatic areas of PIs, inspection program, significance determination process, and assessment is performed. In addition, an assessment of overall ROP efficacy will be made and recommendations for improvement will be developed.

This report focuses on those self-assessment questions associated with the significance determination process (SDP). Due to the lack of historical data, in depth analysis is not possible at this time. However, where appropriate, some conclusions were reached.

Based on audits of inspection reports from the first full year of ROP implementation, it appears that the SDP findings reported met the established standards which supports the conclusion that the SDP is objective. However, auditors could not verify the SDP logic for several GREEN SDP findings because inspection report details were not adequately developed.

Stakeholder response indicates that the SDP focuses NRC and licensee attention on safety-significant issues. SDP outcomes were conservative and generally accepted by the licensees. And evaluation of docketed correspondence for WHITE, YELLOW, and RED findings contained the appropriate information, including the basis for any deviations, necessary to support SDP outcomes. These support the conclusion that the SDP is risk-informed as designed.

With regard to being understandable, stakeholder feedback indicates that internal and external stakeholders perceive the SDP as a verifiable and consistent ROP tool. The stakeholders believe that the reactor SDP is an improvement over past inspection finding significance determination efforts. However, certain non-reactor SDP methodologies are still considered to be too complex.

In general, internal and external respondents had a positive perception of the stability and predictability of the SDP. Final significance ratings were understandable and believed to accurately reflect the significance of the findings.

It is too early to draw accurate conclusions regarding the SDP's capabilities of maintaining safety. The review of SDP findings confirmed that the majority of SDP outcomes were reached in accordance with the established guidance and the significance ratings were relatively conservative.

Overall stakeholder feedback and survey results indicate a positive perception of the SDP as an effective ROP tool that focuses NRC and licensee attention on significant issues. In general, SDP outcomes were considered to be accurate and conservative. A concern was expressed regarding the staff's proficiency with the SDP and the timeliness of final SDP results.

Increased emphasis on accurate characterization and timely resolution of issues is necessary to ensure that the NRC and licensee resources are focused and that risk significant findings are promptly corrected. Accurate characterization and prompt resolution of issues increases public confidence.

While it may be too early to draw absolute inferences, the slightly positive internal response and the positive external stakeholder perception from the previous year indicate that the staff and industry believe that the SDP has permitted NRC and licensees to allocate appropriate resources based on safety significance. A continued positive perception indicates a successful outcome.

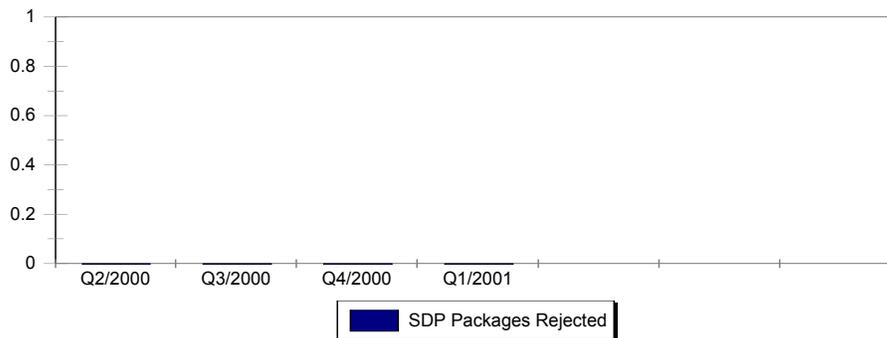
**OS1 SDP outcomes are tied to clear standards as measured by:**

**OS1.a** Number of SDP packages that are returned to the region by SDP panel due to not meeting established standards

**How:** Can be accomplished by adding a block to SDP panel form indicating rejection due to not meeting established standards (which may include lack of technical basis of fact in documentation provided).

**Success:** Low percentage overall w/ steady or declining trend. First year of data used to benchmark for future comparison. Will define “low” after first data set collected.

**Lead:** IIPB



**Comment:** No Significance Determination and Enforcement Review Panel (SERP) packages have been returned to the regions for not meeting established Significance Determination Process standards.

**Analysis:** The SERP packages have been prepared in accordance with established guidelines. The SERP packages contained the necessary operational information to reach a risk-informed significance rating.

**Other Areas:** Understandable, Effective & Efficient

**OBJECTIVE**

**OS1.b** Independent audit of GREEN findings agrees that the selected findings meet established standards.

**How:** Design a single audit process to include elements noted in all subsequent metrics (i.e., see US1a, PS1a, MS1a, ES2a). Independent reviewer given inspection reports containing a representative (cross-regional) selection of GREEN findings. Sample size selected for 95% confidence (for all audit samples).

**Success:** 95% confidence factor - Yes in all cases. Must explain why if not.

**Lead:** DSSA/SPSB (reactor); DIPM/IOLB(non-reactor)

**Results:** The majority of GREEN SDP findings met the established SDP standards. However, several instances were identified where the inspection report documentation did not contain key safety-related activities or risk contributors which complicated the ability of the auditor to trace the SDP logic and verify the significance rating. Also, licensee identified violations of very low safety significance (GREEN) were in some cases incorrectly characterized as NO COLOR findings in accordance with IMC 0610\*, Power Reactor Inspection Reports.

**Other Areas:** Understandable, Effective & Efficient

**Conclusion:** Based on audits of inspection reports from the first full year of ROP implementation, it appears that the SDP findings reported generally met the established standards which supports the conclusion that the SDP is objective. However, auditors could not verify the SDP logic for several GREEN SDP findings because inspection report details were not adequately developed.

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**RISK-INFORMED**

The SDP will be considered to be risk-informed by design, however, the following metrics may provide insights.

**RS1 All Information Needed to Reach a Conclusion, Including the Basis for Any Deviations, Is Available. (Same as US1) Measured By:**

- a. The degree to which an auditor can trace through the available documentation and reach the same result (Same as US1a)

**How:** Independent reviewer given inspection reports & transmittal documents (for GREEN findings) [SeeOS1b re 95% confidence factor for sample size] and SDP panel packages (for >GREEN) [100% sample size] (Same as PS1a)

**Success:** Yes in all cases - must explain why if not.

**Lead:** RES for >GREEN  
DSSA/SPSB(reactor); DIPM/IOLB(non-reactor) for GREEN

**Results:** Independent review of the five greater than GREEN findings issued during the April 02, 2000 through December 31, 2000 period in the Initiating Event, Mitigating Systems, and Barrier cornerstones, identified one instance (Millstone-2) where insufficient information was provided in the docketed correspondence to validate the significance rating (WHITE) of the SDP finding. The quantitative results of the Significance Determination and Enforcement Review Process (SERP) were not included in the inspection report findings nor the Notice of Violation.

The audit of GREEN SDP findings, revealed instances where the inspection report documentation did not contain key safety-related activities or risk contributors. The lack of information complicated the ability of the auditor to trace the SDP logic and verify the significance rating. Licensee identified violations were in some cases incorrectly identified as NO COLOR findings instead of GREEN findings as specified in IMC 0610\*, Power Reactor Inspection Reports.

**Other Areas:** Understandable

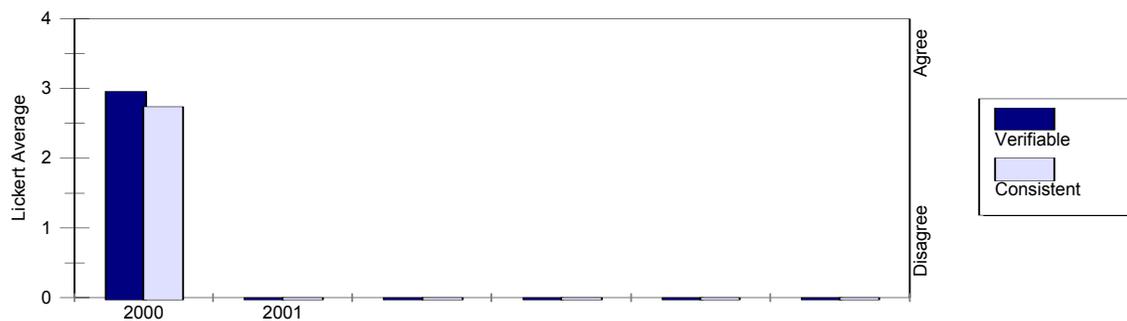
**RISK-INFORMED**

**RS1.b** Stakeholder feedback indicating ability/inability to reconstruct SDP outcomes (Same as US1b)

**How:** Federal Register Notice, NRC sponsored survey (OMB clearance required), NEI blind survey of industry. Develop specific quantitative survey question.

**Success:** Trend of stable or increasing perception of issue over time

**Lead:** IIPB



**Results:** The Federal Register Notice survey indicates that the majority of respondents believe that the SDP process produces consistent and accurate results. However, during the external stakeholder workshops, the Union of Concerned Scientists asserted that the SDP was fundamentally flawed in that it permits inadequate justification for designating findings as GREEN and presented two case histories from Beaver Valley 1 to support their position.

**Analysis:** During the ROP Pilot Program, similar internal survey questions were asked. While it may be too early to draw absolute inferences, a qualitative review of the stakeholder survey results and feedback indicates a continued positive perception of the SDP.

**Other Areas:** Understandable

**RS2 The SDP Focuses NRC and Licensee Attention on Safety-significant Issues.  
(Same as MS1) Measured by:**

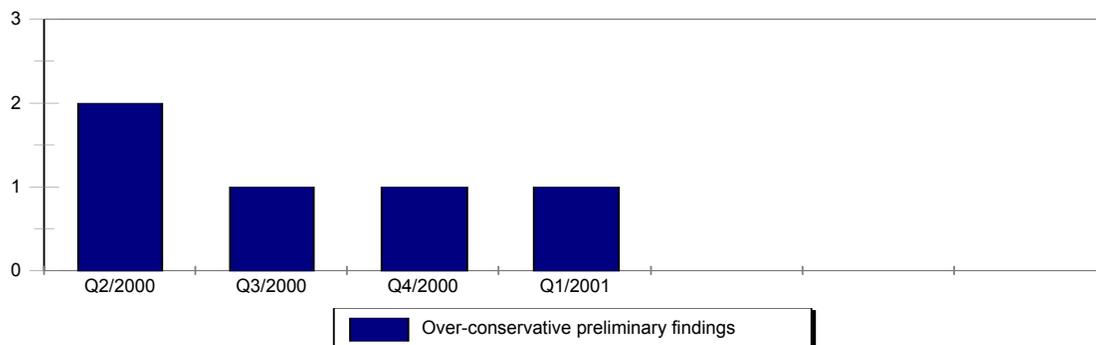
- a. Tracking the numbers of over-conservative and non-conservative SDP results.  
(Same as MS1a)

**How:** Over-conservative: See question OS1a - panel form should indicate over-conservative result.

Non-conservative: Audit by DSSA/DIPM of a representative sample of GREEN findings (See OS1b). Quarterly report.

**Success:** Over-conservative: Steady or decreasing trend - will track 1<sup>st</sup> year for possible threshold setting.  
Non-conservative: Target Goal = zero from sample. Any identified will require adjustment of process. After 1<sup>st</sup> year expect a steady decrease.

**Lead:** Over-conservative - IIPB  
Non-conservative - DSSA/SPSB(reactor); DIPM/IOLB(non-reactor)



**Comments:** This illustration represents those findings that were initially categorized as WHITE or greater during a preliminary SERP that were subsequently downgraded following detailed Phase 3 evaluations, regulatory conferences, and/or the final SERP deliberations.

**Results:** Audits of reported GREEN SDP findings confirmed that the inspection findings and assessment results met applicable SDP significance criteria and were relatively conservative. It was noted that a number of GREEN SDP findings were not adequately documented to allow the auditors to easily reconstruct the SDP logic used in reaching the GREEN significance rating.

**RS3 Licensees Accept SDP Results. (Same as ES5) Measured By:**

**RS3.a** Tracking the total number of appeals (Same as ES5a)

**How:** Regions report: track total and by region

**Success:** Track 1<sup>st</sup> year to establish baseline  
Steady or decreasing trend

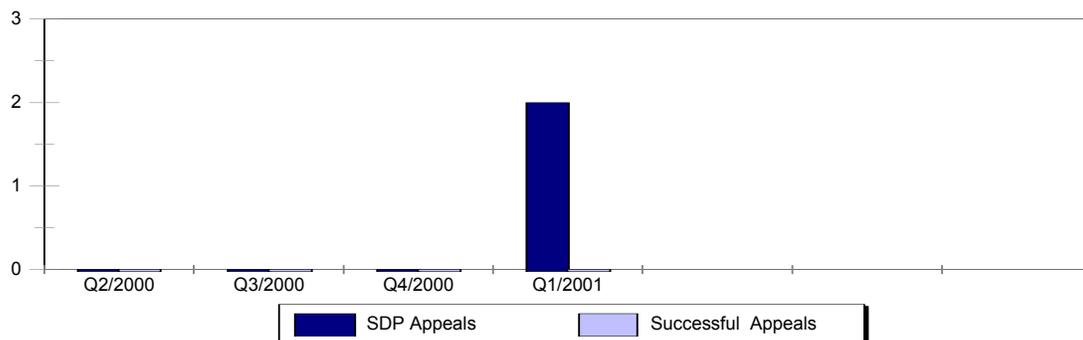
**Lead:** Regions ES5.a&b - Licensees Accept SDP Results

**RS3.b** Tracking the proportion of appeals that are successful (Same as ES5b)

**How:** Regions report

**Success:** Steady or decreasing trend.  
Any will be considered for process adjustment  
Annual report of any resultant adjustments

**Lead:** Regions



**Comments:** Two disputes of final significance determination process findings have been submitted. The disputes involved 3 WHITE SDP findings at Callaway and 2 GREEN SDP findings at Comanche Peak in the Occupational Radiation Safety cornerstone.

**Analysis:** No appeals have resulted in an overturned final SDP significance rating.

**Other Areas:** Effective, Efficient & Realistic (primary), Enhance Public Confidence, Unnecessary Regulatory Burden

**Conclusion:** Stakeholder response indicates that the SDP focuses NRC and licensee attention on safety-significant issues. SDP outcomes were conservative and generally accepted by the licensees. And evaluation of docketed correspondence for WHITE, YELLOW, and RED findings contained the appropriate information, including the basis for any deviations, necessary to

support SDP outcomes. All of which support the conclusion that the SDP is risk-informed as designed. However, documentation for GREEN SDP findings was inconsistent and limited the ability of auditors to trace the SDP logic and verify the GREEN significance rating.

**UNDERSTANDABLE**

**US1 All Information Needed to Reach a Conclusion, Including the Basis for Any Deviations, Is Available. Measured By:**

**US1.a** The degree to which an auditor can trace through the available documentation and reach the same result (Same as RS1a)

**How:** Independent reviewer given inspection reports & transmittal documents (for GREEN findings) [SeeOS1b re 95% confidence factor for sample size] and SDP panel packages (for >GREEN) [100% sample size] (Same as PS1a)

**Success:** Yes in all cases - must explain why if not.

**Lead:** RES for >GREEN  
DSSA/SPSB(reactor); DIPM/IOLB(non-reactor) for GREEN

**Results:** Independent review of the five greater than GREEN SDP findings issued during the April 02, 2000 through December 31, 2000 period under the initiating event, mitigating systems, and barrier cornerstones, identified one instance (Millstone-2) where insufficient information was provided in docketed correspondence to validate the significant rating (WHITE) of the SDP. The quantitative results of the SERP were not included in the inspection report findings nor the Notice of Violation.

The audit of GREEN SDP findings, revealed instances where the inspection report documentation did not contain key safety-related activities or risk contributors. The lack of information complicated the ability of the auditor to trace the SDP logic and verify the significance rating. In a few instances, licensee identified violations of very low safety significance (GREEN) were in classified as NO COLOR findings in the inspection reports.

**Other Areas:** Predictable (also primary), Risk Informed, Effective & Efficient

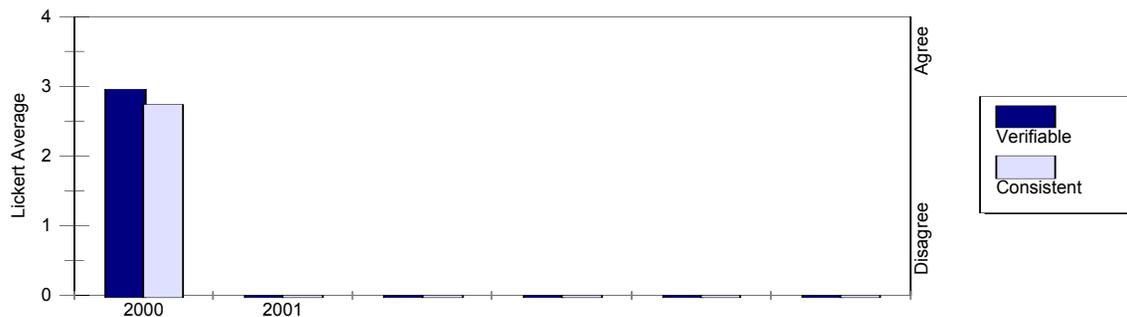
**UNDERSTANDABLE**

**US1.b** Stakeholder feedback indicating ability/inability to reconstruct SDP outcomes

**How:** Federal Register Notice, NRC sponsored survey (OMB clearance required), NEI blind survey of industry. Develop specific quantitative survey question.

**Success:** Trend of stable or increasing perception of issue over time

**Lead:** IIPB



**Results:** Federal Register Notice survey feedback indicates that the majority of external respondents believe that the SDP process produces consistent and accurate results. The Union of Concerned Scientists asserted that the SDP was fundamentally flawed in that it permits inadequate justification for designating findings as GREEN and presented two case histories from Beaver Valley 1 to support their conclusions.

**Analysis:** During the ROP Pilot Program, similar internal survey questions were asked. While it may be too early to draw absolute inferences, a qualitative review of the stakeholder survey results and feedback indicates a continued positive perception of SDP consistency.

**Other Areas:** Predictable (also primary), Risk Informed, Effective & Efficient

**UNDERSTANDABLE**

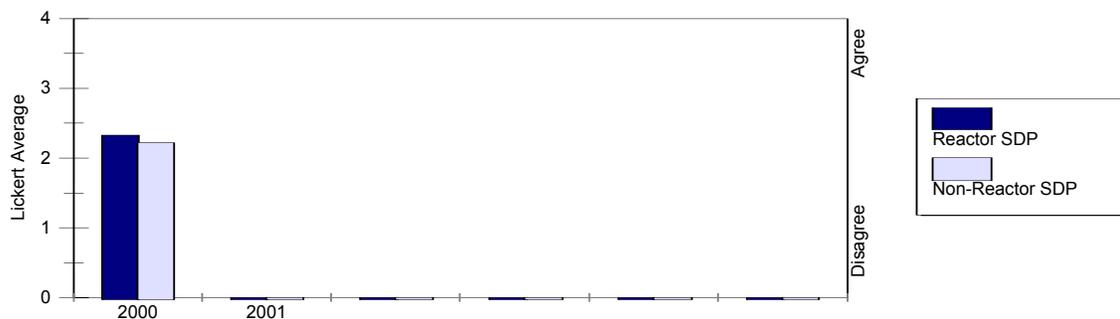
**US2 Inspection Staff Is Comfortable/Proficient Using the SDP Tool and Find Value in Using it. Measured by:**

**US2.a** Trending internal stakeholder feedback over time

**How:** Internal Survey. Develop specific quantitative survey questions focused on 1) comfortable and 2) finding value.

**Success:** Positive trend

**Lead:** IIPB/Regions



**Analysis:** During the ROP Pilot Program, similar internal survey questions were asked. The results indicated a negative perception of the SDP. A qualitative review of the current survey responses indicated an increasingly positive perception. While it may be too early to draw absolute inferences, the increasingly positive perception indicates that during the initial period of implementation, the staff has become more comfortable in using the SDP.

**Other Areas:** Effective & Efficient (also primary)

**Conclusion:** With regard to being understandable, stakeholder feedback indicates that internal stakeholders are gaining confidence that the SDP is a verifiable and consistent ROP tool. The stakeholders believe that the reactor SDP is an improvement over past inspection finding significance determination efforts. However, certain non-reactor SDP methodologies are still considered to be too complex.

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**PREDICTABLE**

**PS1 SDP Results Can Be Reproduced, Given the Same Information. Measured by:**

**PS1.a** The degree to which an auditor can trace through the available documentation and reach the same result (Same as US1a)

**How:** Independent reviewer given inspection reports & transmittal documents (for GREEN findings) [SeeOS1b re 95% confidence factor for sample size] and SDP panel packages (for >GREEN) [100% sample size] (Same as PS1a)

**Success:** Yes in all cases - must explain why if not.

**Lead:** RES for >GREEN  
DSSA/SPSB(reactor); DIPM/IOLB(non-reactor) for GREEN

**Results:** Independent review of the five greater than GREEN SDP findings issued during the April 02, 2000 through December 31, 2000 period under the initiating event, mitigating systems, and barrier cornerstones, identified one instance (Millstone-2) where insufficient information was provided in docketed correspondence to validate the significant rating (WHITE) of the SDP. The quantitative results of the SERP were not included in the inspection report findings nor the Notice of Violation.

The audit of GREEN SDP findings, revealed instances where the inspection report documentation did not contain key safety-related activities or risk contributors. The lack of information complicated the ability of the auditor to trace the SDP logic and verify the significance rating. In a few instances, licensee identified violations of very low safety significance (GREEN) were in classified as NO COLOR findings in the inspection reports.

**Other Areas:** Understandable (also primary), Risk Informed, Effective & Efficient

**PREDICTABLE**

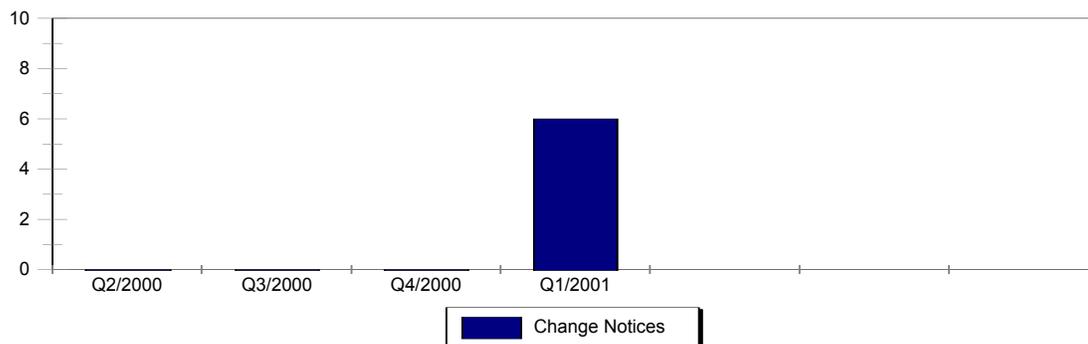
**PS2 Standards and Processes Remain Stable over Time. Measured by:**

**PS2.a** The number of substantive change notices issued on program guidance, tables, or worksheets

**How:** Change notice shall have block noting “How many a) editorial, b) due to errors in worksheets or not reflecting plant design or operating practices (see C3a), or c) substantive (defined as anything other than a, b, or for purposes of clarification)

**Success:** Trend number of changes vs threshold. Collect data 1<sup>st</sup> year to establish threshold.

**Lead:** IIPB



**Comments:** The illustration represents revisions made to IMC 0609 and appendices following the first three quarters of full ROP implementation to incorporate lessons learned and newly developed SDP tools.

**Analysis:** Initial changes have been primarily the result of addressing user comments and concerns. Therefore, these changes are predominantly improvements that have not detracted from SDP stability.

**Other Areas:** Understandable, Maintain Safety, Effective & Efficient

**PREDICTABLE**

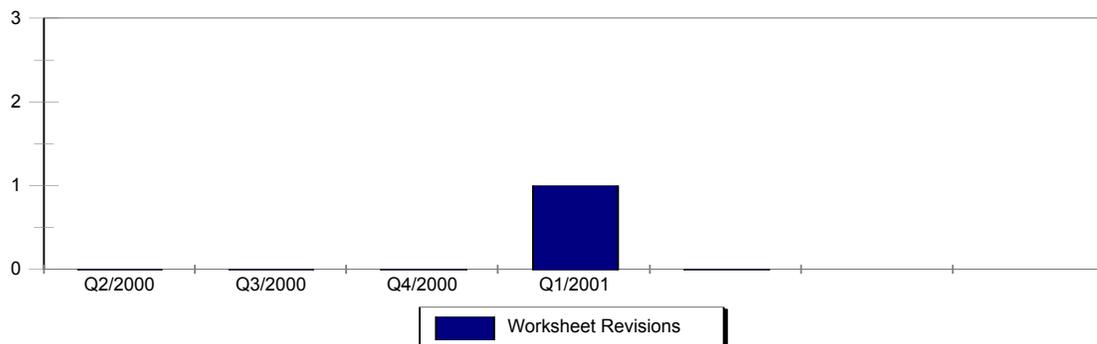
**PS3 The Reactor SDP Tools Reflect Current Plant Design and Licensee Operating Practices. Measured by:**

**PS3.a** Tracking the number of worksheet changes due to errors in the worksheets as a result of not reflecting plant design and operating practices.

**How:** SDP worksheet change notice originator will be required to identify reason for change: i.e, change due to recent modifications/other significant issue or change due to not reflecting current operating practice or editorial change, etc. [Collected in conjunction with PS2.a (number of changes)] includes pre-screening worksheet

**Success:** Trend vs threshold. Collect data 1<sup>st</sup> year to establish threshold.

**Lead:** IIPB



**Analysis:** The final revisions of the site-specific risk-informed inspection notebooks (worksheets) incorporating plant-specific features and operating practices will be published and issued through July 2001 for each operating reactor plant. As they are published they will be incorporated as Attachment 3 to IMC 0609, Appendix A.

**Other Areas:** Understandable, Maintain Safety, Effective & Efficient

**PREDICTABLE**

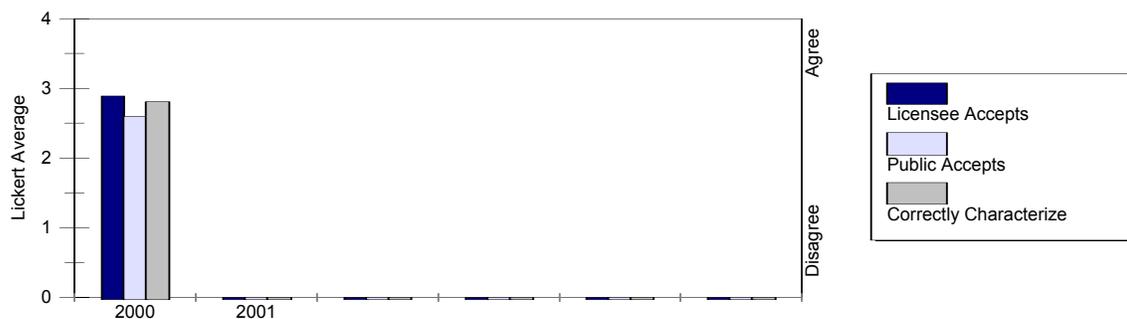
**PS4 SDP Results of the Same Color are Perceived to Translate to the Same Level of Concern for All Cornerstones. Measured By:**

**PS4.a** Observing trends in survey

**How:** NRC sponsored survey (OMB clearance required), NRC internal survey, NEI blind survey of industry. Quantitative survey question also asking for examples of where translation does not occur.

**Success:** Trend of stable or increasing perception of issue over time

**Lead:** IIPB



**Comments:** In general stakeholder response was positive. NRC staff is comfortable with the SDP and industry respondents believe that the SDP significance thresholds are generally uniform across cornerstones. The State of Pennsylvania raised concerns describing the SDP as complex and too complicated for the public to understand and therefore considered the SDP to be a de facto barrier to public understanding of the regulatory process.

**Other Areas:** Effective & Efficient, Public Confidence

**Conclusion:** In general, internal and external respondents had a positive perception of the stability and predictability of the SDP. Final significance ratings were understandable and believed to accurately reflect the significance of the findings. A concern was noted regarding the complexity of the SDP and lack of adequate documentation for several GREEN SDP findings.

**MAINTAINS SAFETY**

The SDP will be considered to maintain safety if all other goals are met and if:

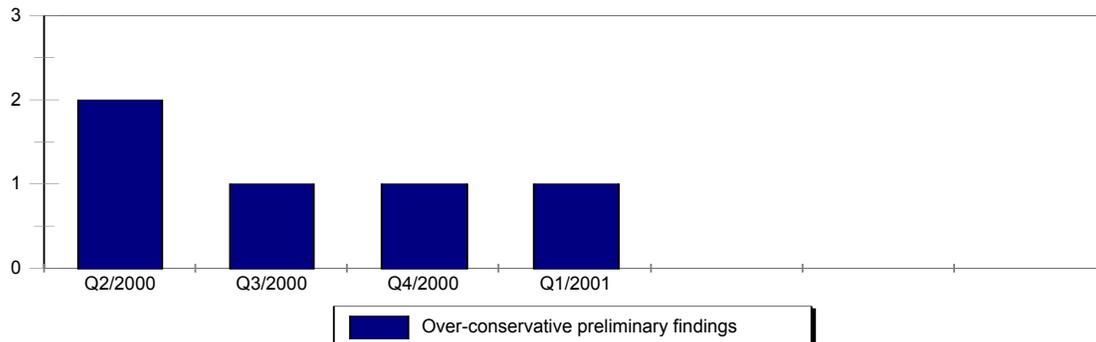
**MS1 The SDP Focuses NRC and Licensee Attention on Safety-significant Issues.  
Measured by:**

**MS1.a** Tracking the numbers of over-conservative and non-conservative SDP results.

**How:** Over-conservative: See question OS1a - panel form should indicate over-conservative result.  
Non-conservative: Audit by DSSA/DIPM of a representative sample of GREEN findings (See OS1b). Quarterly report.

**Success:** Over-conservative: Steady or decreasing trend - will track 1<sup>st</sup> year for possible threshold setting.  
Non-conservative: Target Goal = zero from sample. Any identified will require adjustment of process. After 1<sup>st</sup> year expect a steady decrease.

**Lead:** Over-conservative - IIPB  
Non-conservative - DSSA/SPSB(reactor); DIPM/IOLB(non-reactor)



**Comments:** This illustration represents those findings that were initially categorized as WHITE or greater during preliminary Significance Determination and Enforcement Review Panels (SERP) that were subsequently downgraded following detailed SDP Phase 3 evaluations, regulatory conferences, and/or the final SERP deliberations.

**Other Areas:** Effective & Efficient (also primary), Risk Informed, Enhance Public Confidence

**Conclusion:** It is too early to draw accurate conclusions regarding the SDP’s capabilities of maintaining safety. The review of SDP findings confirmed that the majority of SDP outcomes were reached in accordance with the established guidance and the significance ratings were relatively conservative.

**EFFICIENT, EFFECTIVE, AND REALISTIC**

**ES1 The Resources (Direct Charges and Support Activities) Expended Are Appropriate to the Benefit (Significance of Issues Identified). Measured by:**

**ES1.a** Tracking the number of times the NRC must interact with the licensee to reach final result.

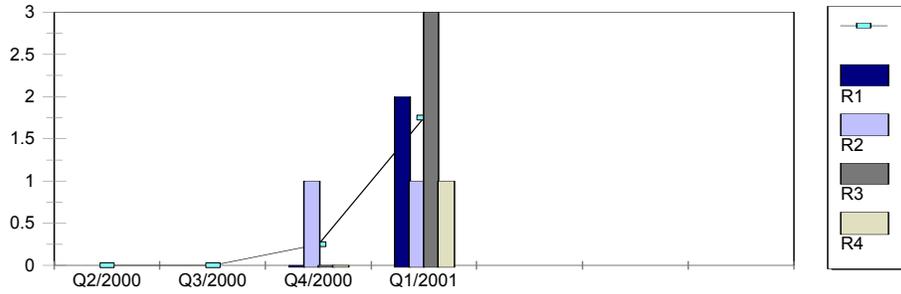
**How:** 1) Count number of docketed submittals and 2) Count number of regulatory conferences per non-green findings

**Success:** 1) Track and trend (steady or declining) and 2) Track and trend; goal for regulatory conferences: one/finding (may be greater for RED)

**Lead:** Regions (quarterly report)

**Analysis:** This metric was determined to not provide any useful measure of resource effort and is recommended for removal.

**EFFICIENT, EFFECTIVE, AND REALISTIC**



**Analysis:** Regulatory conferences and docketed submittals met established SDP goals.

**Other Areas:** Enhance Public Confidence, Unnecessary Regulatory Burden

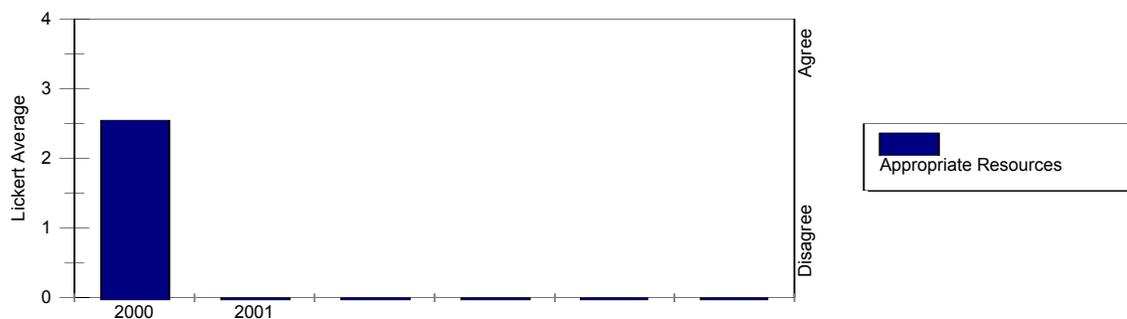
**EFFICIENT, EFFECTIVE, AND REALISTIC**

**ES1.b** Stakeholder feedback on appropriateness of resource expenditure

**How:** Tailored survey question

**Success:** Track and trend, stable or increasingly positive perception.

**Lead:** IIPB



**Comments:** During the ROP Pilot Program, a similar internal survey question was asked. A qualitative review of the overall response to that question indicated a positive perception.

**Results:** Internal and external stakeholder feedback indicates that the staff and the industry believe that the SDP has permitted NRC and licensees to allocate appropriate resources based on safety significance. This continued positive perception indicates a successful outcome.

**Other Areas:** Enhance Public Confidence, Unnecessary regulatory Burden (also primary)

**EFFICIENT, EFFECTIVE, AND REALISTIC**

**ES2 The SDP Results Are Accurate and Complete. Measured By:**

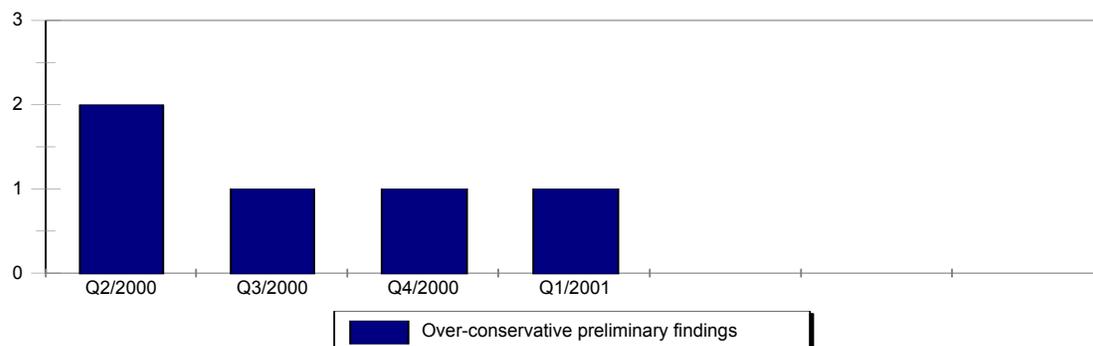
**ES2.a** Tracking the numbers of over-conservative and non-conservative SDP results (Same as MS1.a)

**How:** Over-conservative: See question OS1a - panel form should indicate over-conservative result.

Non-conservative: Audit by DSSA/DIPM of a representative sample of GREEN findings (See OS1b). Quarterly report.

**Success:** Over-conservative: Steady or decreasing trend - will track 1<sup>st</sup> year for possible threshold setting.  
Non-conservative: Target Goal = zero from sample. Any identified will require adjustment of process. After 1<sup>st</sup> year expect a steady decrease.

**Lead:** Over-conservative - IIPB  
Non-conservative - DSSA/SPSB(reactor); DIPM/IOLB(non-reactor)



**Comments:** This illustration represents those findings that were initially categorized as WHITE or greater during preliminary Significance Determination and Enforcement Review Panels (SERP) that were subsequently downgraded following detailed Phase 3 evaluations, regulatory conferences, and/or the final SERP deliberations.

**Results:** The review of SDP findings confirmed that the majority of SDP outcomes were reached in accordance with the established guidance and the significance ratings were relatively conservative.

**Other Areas:** Effective & Efficient (also primary), Risk Informed, Enhance Public Confidence

**EFFICIENT, EFFECTIVE, AND REALISTIC**

**ES3 The SDP Results Are Timely. Measured by:**

**ES3.a** Determining whether timeliness goals were met

**How:** Regions report number of SDP results not meeting timeliness goals in IMC 0609 (90% within 90 days).

**Success:** Track 1<sup>st</sup> year for baseline then steady or decreasing trend.

**Lead:** Regions

**Analysis:** This metric was inconsistently reported due to a lack of precise definition of the performance goal “start” time. SDP timeliness analysis has been performed by the Office of Enforcement, which determined that the average cycle time from official exit meeting to final SDP issuance was 98 days for the period from April 2000 through February 2001. This value increases by 53 days if the start time is the last on-site day of the inspection. A new set of more precise SDP timeliness metrics will be developed for subsequent self-assessment reports.

**EFFICIENT, EFFECTIVE, AND REALISTIC**

**ES3.a** Number of days SDP evaluations exceeded timeliness goals.

**Comments:** Both issues were finally characterized as GREEN findings following detailed regional SRA risk analyses.

**Analysis:** This metric was inconsistently reported due to a lack of precise definition of the performance goal “start” time. SDP timeliness analysis has been performed by the Office of Enforcement, which determined that the average cycle time from official exit meeting to final SDP issuance was 98 days for the period from April 2000 through February 2001. This value increases by 53 days if the start time is the last on-site day of the inspection. A new set of more precise SDP timeliness metrics will be developed for subsequent self-assessment reports.

**Other Areas:** Predictable, Enhance Public Confidence (also primary)

**EFFICIENT, EFFECTIVE, AND REALISTIC**

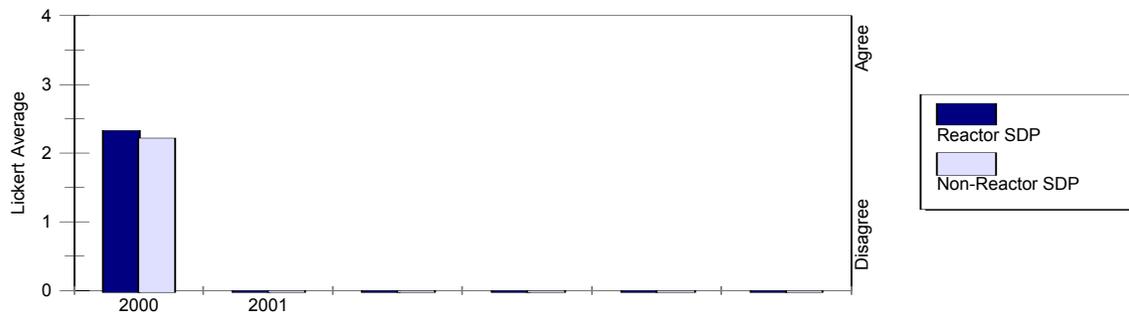
**ES4 Inspection Staff Is Comfortable/Proficient Using the SDP Tool and Find Value in Using it. Measured by:**

**ES4.a** Trending internal stakeholder feedback over time (Same as US2.a)

**How:** Internal Survey. Develop specific quantitative survey questions focused on 1) comfortable and 2) finding value.

**Success:** Positive trend

**Lead:** IIPB/Regions



**Analysis:** During the ROP Pilot Program, similar internal survey questions were asked. The results of the pilot program survey indicated a negative perception of the SDP. Qualitative review of the current responses indicated an increased positive perception. While it may be too early to draw absolute inferences, the increased positive perception indicates that the staff has become more comfortable and proficient with the SDP.

**Other Areas:** Understandable

**EFFICIENT, EFFECTIVE, AND REALISTIC**

**ES5 Licensees Accept SDP Results. Measured By:**

**ES5.a** Tracking the total number of SDP appeals

**How:** Regions report: track total and by region

**Success:** Track 1<sup>st</sup> year to establish baseline  
Steady or decreasing trend

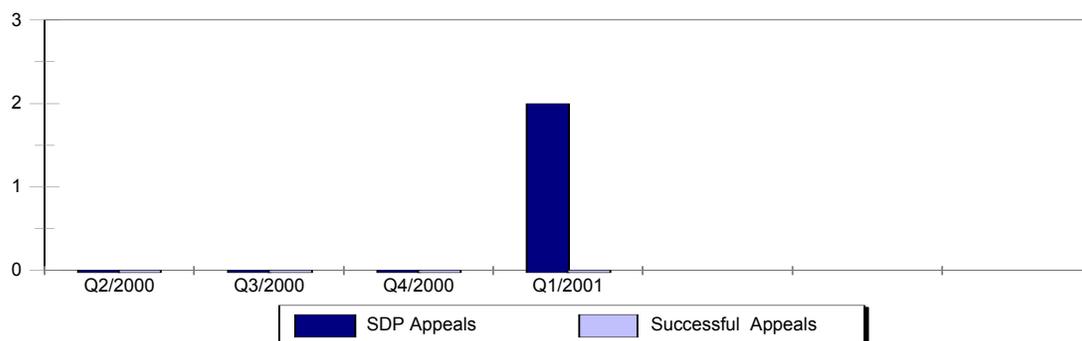
**Lead:** Regions- Licensee Accepts SDP Results

**ES5.b** Tracking the proportion of appeals that are successful

**How:** Regions report

**Success:** Steady or decreasing trend.  
Any will be considered for process adjustment  
Annual report of any resultant adjustments

**Lead:** Regions



**Comments:** Two disputes of final significance determination process findings have been submitted. The disputes involved 3 WHITE findings at Callaway and 2 GREEN findings at Comanche Peak in the Occupational Radiation Safety cornerstone.

**Analysis:** No appeals have resulted in an overturned final SDP significance rating.

**Other Areas:** Risk Informed, Enhance Public Confidence, Unnecessary Regulatory Burden

**Conclusion:** Overall stakeholder feedback and survey results indicate a positive perception of the SDP as an effective ROP tool that focuses NRC and licensee attention on significant issues. In general, SDP outcomes were considered to be accurate and conservative. The SDP was also recognized as an improvement over previous inspection findings risk evaluation methods. A concern was expressed regarding the staff's proficiency with the SDP and the timeliness of final SDP results.

**ENHANCES PUBLIC CONFIDENCE**

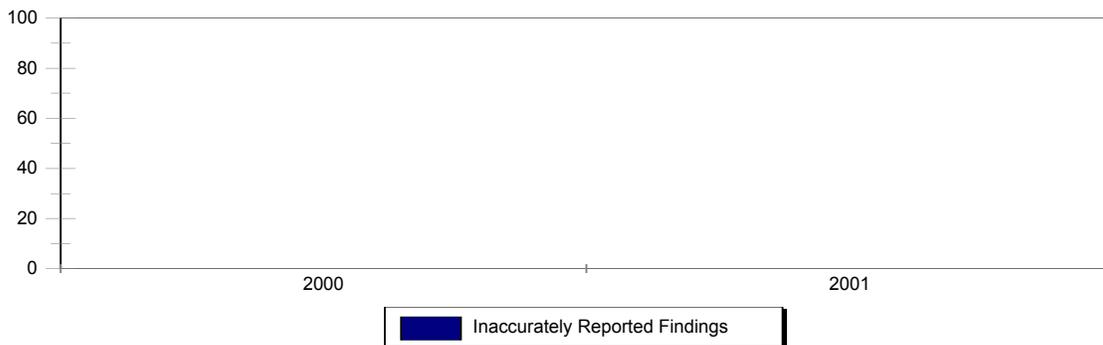
**CS1 Results Are Communicated in a Way That Demonstrates That the NRC Understands the Plant's Performance. Measured By:**

**CS1.a** Verifying the accuracy of facts NRC communicated (color of findings is accurately reported)

**How:** IIPB annual audit of website.

**Success:** Low number of inaccuracies; steady or declining trend - Must address all inaccuracies

**Lead:** IIPB



**Analysis:** No reporting errors were identified during the audit of NRC communicated color findings.

**Other Areas:** Understandable

**ENHANCES PUBLIC CONFIDENCE**

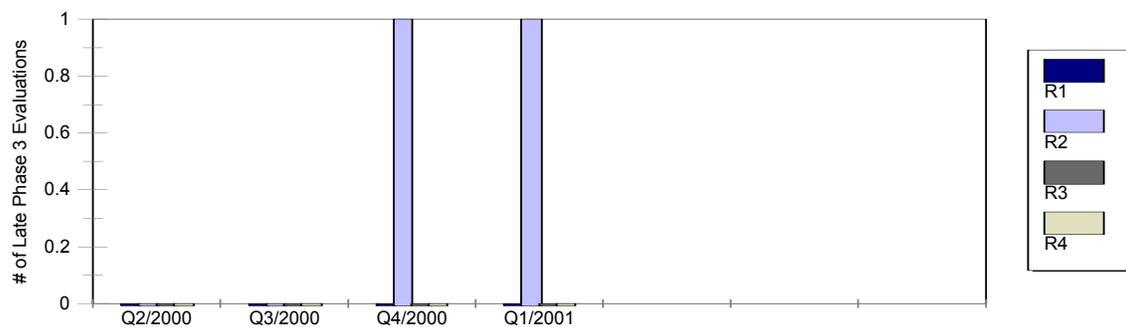
**CS2 The SDP Results Are Timely. Measured by:**

**CS2.a** Determining whether timeliness goals were met (Same as ES3.a)

**How:** Regions report percent not meeting timeliness goals and how many days late each was. (Should capture all goals here, including OE goal of ID to panel.)

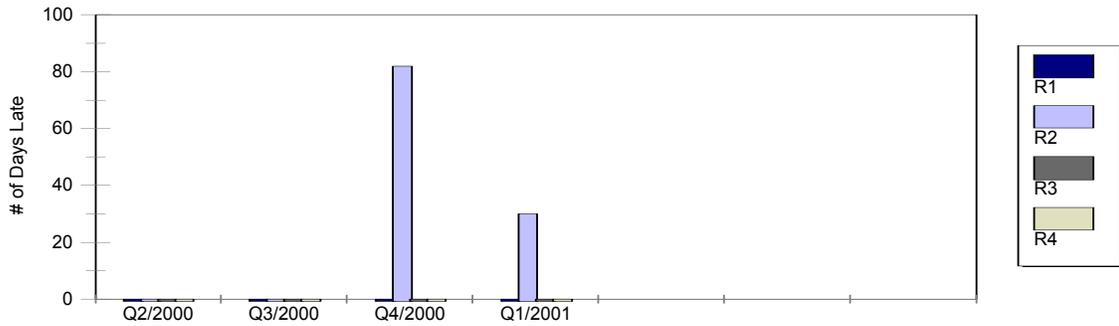
**Success:** Track 1<sup>st</sup> year for baseline then steady or decreasing trend.

**Lead:** Regions



**Analysis:** This metric was inconsistently reported due to a lack of precise definition of the performance goal “start” time. SDP timeliness analysis has been performed by the Office of Enforcement, which determined that the average cycle time from official exit meeting to final SDP issuance was 98 days for the period from April 2000 through February 2001. This value increases by 53 days if the start time is the last on-site day of the inspection. A new set of more precise SDP timeliness metrics will be developed for subsequent self-assessment reports.

**ENHANCES PUBLIC CONFIDENCE**



**Comments:** Both issues were finally characterized as GREEN findings following detailed regional SRA risk analyses.

**Other Areas:** Predictable, Efficient, Effective & Realistic (also primary)

**Conclusion:** Increased emphasis on accurate characterization and timely resolution of issues is necessary to ensure that the NRC and licensee resources are focused and that risk significant findings are promptly corrected. Accurate characterization and prompt resolution of issues increases public confidence.

**REDUCES UNNECESSARY REGULATORY BURDEN**

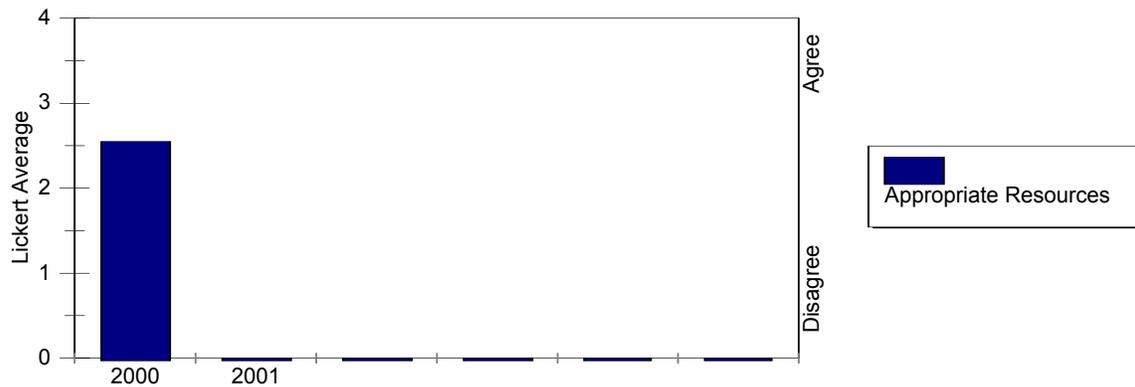
**BS1 The Use of the SDP Results in the Licensee Resource Expenditures Consistent with the Significance of Inspection Findings. Measured by:**

**BS1.a** Stakeholder feedback on appropriateness of resource expenditure

**How:** Tailored survey question

**Success:** Track and trend, stable or increasingly positive perception. (Same as ES1.b)

**Lead:** IIPB



**Comments:** During the ROP Pilot Program, a similar internal survey question was asked. A qualitative review of the overall response to that question indicated a positive perception.

**Other Areas:** Enhance Public Confidence, Effective, Efficient & Realistic (also primary)

**Conclusion:** While it may be too early to draw absolute inferences, the slightly positive internal response (>2.5) and the positive external stakeholder perception from the previous year indicate that the staff and industry believe that the SDP has permitted NRC and licensees to allocate appropriate resources based on safety significance. A continued positive perception indicates a successful outcome.