	METRIC[1]	OBJECTIVE	RISK-INFORMED	UNDERSTAND-ABLE	PREDICTABLE	MAINTAINS SAFETY	EFFECTIVE, EFFICIENT, REALISTIC	ENHANCES PUBLIC CONFIDENCE	REDUCES UNNECESSARY REGULATORY BURDEN	DATA[2] COLLECT	SURVEY[2]
IP-1	Percentage of inspection findings IAW requirements	P	S							HQ	
IP-2	No. of baseline IPs significantly changed		P			S				HQ	
IP-3	No. of feedback forms per document			P						HQ	
IP-4	Completion of baseline inspection program				P		S			HQ	
IP-5	No. of and reasons for schedule delays				S	P				REG	
IP-6	Inspection reports are timely						P			HQ REG	
IP-7	TIs completed timely						P			HQ REG	
IP-8	Public communication is timely							P		HQ	
IP-9	Public communicatin is accurate							P		REG HQ	
IP-10	Analysis of inspection hours				S		P			HQ	
IP-11	Survey of ROP users	S		P						HQ REG	I
IP-12	Survey of inspection report usefulness			S					P	HQ	E

[1] A shaded metric number (e.g., IP-1) indicates a metic that did not meet its criteria. Crosshatched blocks indicate metrics not counted during this reporting period.

[2] REG = Regions, HQ = Headquarters, I = internal stakeholder survey, E = external stakeholder comments.

IP-1 (OI1a) **Percentage of Inspection Findings IAW Requirements**

Definition: Audit inspection reports in relation to program requirements (IMC 0610*) for documenting green findings, greater-than-green findings, and violations, and report the percentage of findings that meet the program requirements. Each year, audit all team reports, one resident/consolidated report from each plant, 25 percent of all other baseline reports, and all non-baseline inspection reports.

Criteria: Expect an improving trend in the percentage of findings documented in accordance with program requirements.

Lead: IIPB
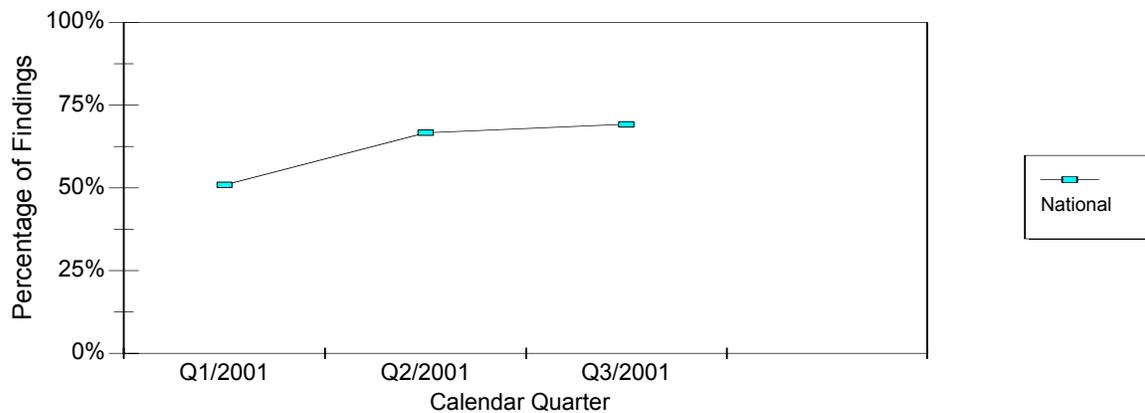
Analysis: For 2001, IIPB audited a total of 102 reports representing a total of 141 findings (128 green or greater and 13 no color). During the third quarter of 2001 (July–September), IIPB audited 50 inspection reports that documented a total of 65 findings (57 green or greater and 8 no color).   The percentage of total findings that conformed to IMC 0610* requirements increased slightly in this quarter from 67 percent to 69 percent, indicating an improving trend. Documenting the bases for significance of findings is still the area that is most in need of improvement. These results are consistent with audits conducted in 1995 and 1998, which found that 60–80 percent of substantive findings were adequately supported in inspection reports, and that 60 percent of noncited violations were properly specified.

A newly revised version of the inspection reporting manual chapter (renumbered as IMC 0612) will be issued for use in 2002. The revision more clearly describes and illustrates how to properly document findings.

IP-2 (RI3.a)   Number of Baseline Inspection Procedures Significantly Changed

Definition: Review all issued changes to baseline inspection procedures and count those documents that have their scope or frequency of inspection changed, and count new inspectable areas that relate to risk-informing the inspection.

Criteria: Expect relatively few significant changes, with a stable or declining trend.

Lead : IIPB
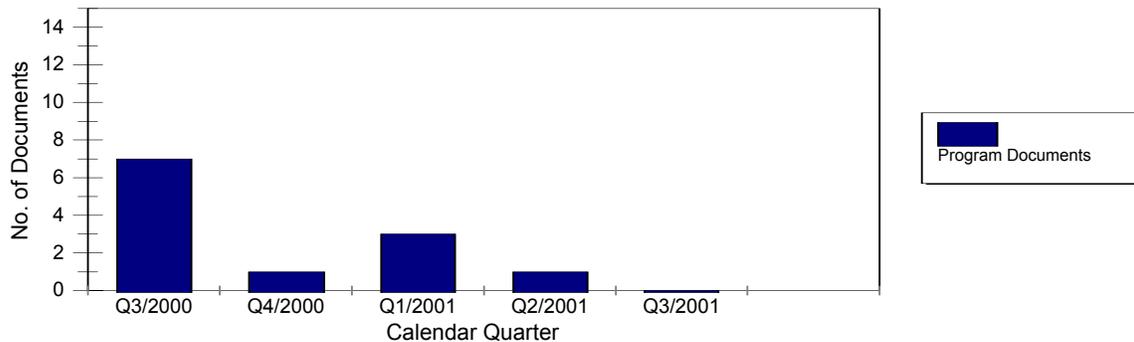
Analysis: The baseline inspection program encompasses 45 procedures in. Of those 45, none were revised in the third quarter of 2001 in a way that would change the scope or frequency of inspection. The number of revisions has steadily decreased over the year. The staff recognizes, however, that revisions to quite a few procedures were issued early in 2002 to incorporate lessons learned from the initial year of ROP implementation and feedback from inspectors.

IP-3 (UI1a)   Number of Feedback Forms per Document

Definition: Count the number of feedback forms received for each program document each quarter. Use a histogram to chart the number of documents for which feedback forms were received. Highlight those documents against which the most forms are written.

Criteria: Expect a decreasing trend in the number of feedback forms received for program documents.

Lead: IIPB
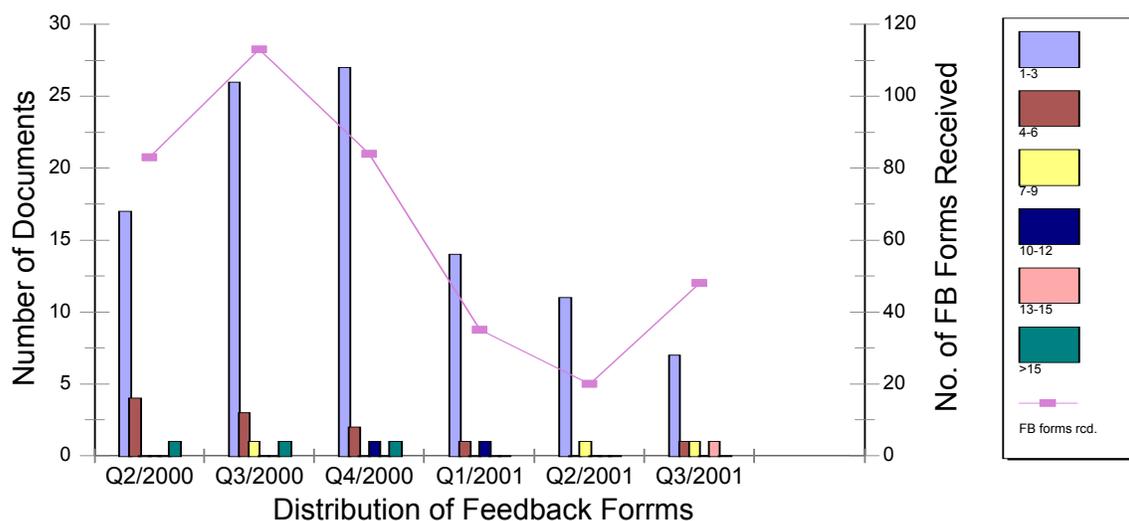
Analysis: The distribution indicates that the overall trend is toward fewer feedback forms, although the number jumped in the third quarter of 2001. The staff attributes the general trend in fewer feedback forms to greater familiarity with the program by the inspection staff and to a dissatisfaction with the earlier feedback process, which was not very responsive the inspectors' comments. The program documents that generated the most forms over the past 18 months are IMC 0608, "Performance Indicator Program," with 98 feedback forms; IMC 0609, "Significance Determination Process [SDP]," and its various attachments with 63 feedback forms; IMC 0610*, "Reactor Inspection Reports," with 49 feedback forms; and Inspection Procedure 71151, "Performance Indicator Verification," with 15 feedback forms. The three program documents that generated the most feedback forms during the third quarter of 2001 were IMC 0610* with 13 feedback forms, IMC 0609 and its attachments with 14 feedback forms, and IMC 0608 with 9 feedback forms.

A large percentage of the feedback forms for IMC 0608 documented questions and issues regarding the interpretation of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," and were processed as frequently asked questions within the Performance Indicator Program. Their resolution may result in a change to the NEI guideline.

The SDPs continue to be problematic, and IIPB and the technical branches continue to improve them. Finalizing the plant-specific worksheets should resolve many of the previous concerns with the process.

To resolve many of the complaints and concerns raised by inspectors and the regions, IIPB has drafted a new inspection reporting directive, numbered IMC 0612. It consolidates into one document the guidance for determining if an inspection issue is important enough to document in an inspection report, simplifies the minimum threshold logic, and eliminates the "no color" findings by assigning a color to non-SDP issues with the concurrence of the inspector's branch chief.

IIPB's feedback process, originated with the ROP, was perceived by the regions and inspectors as being ineffective and untimely. This perception may have been one contributing factor, along with a greater familiarity with a maturing program, to the large reduction in submitted feedback forms. IIPB improved its feedback process by resolving comments received more quickly and reducing the backlog of older feedback forms.

IP-4 (PI1a)   Completion of Baseline Inspection Program

Definition: Assess cumulative completion of baseline IPs during the year.

Criteria: Track the initial year of ROP implementation, and then set goals for percent completion rates; expect 100 percent to be completed at the end of the inspection cycle.

Lead: IIPB
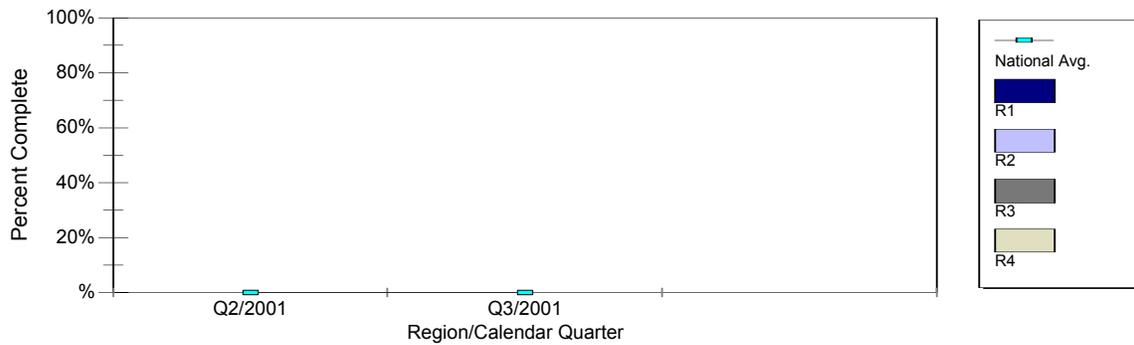
Comments: Meaningful data is difficult to retrieve from the Reactor Program System, although IIPB continues to try to develop a meaningful measure.

IP-5 (PI1.c)   Number of and Reasons for Schedule Changes

Definition: Track the number of scheduled inspections (excluding residents' activities), number of delays, and reasons for such delays. For team inspections (SSDI, Fire, PI&R), report any change in date. For smaller inspections, report only changes of more than 2 weeks. Categorize by reason for change such as needs of NRC (e.g., qualified inspectors not available, etc.), conflict with INPO, or request by plant to have key employees available. If reason is an unavailable inspector, identify the discipline or speciality area of inspection.

Criteria: Track and trend changes.

Lead : Regions
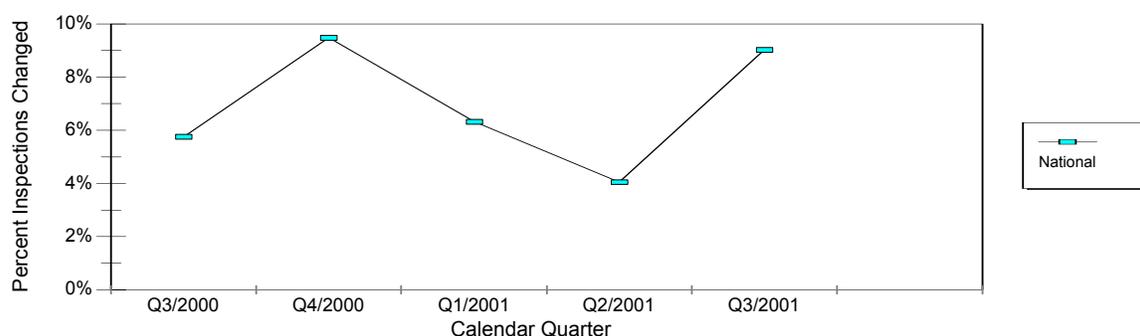
Analysis: For the third quarter of 2001 (second quarter of the 9-month 2001 ROP assessment period), a total of 277 inspections were scheduled, and 31 (about 11 percent) were rescheduled. Of those, 6 schedule changes (2 percent) were made to accommodate a licensee's request (regulatory impact). An additional 25 (9 percent) were changed for reasons other than regulatory impact. Almost half (11) of those changes were made because inspectors were unavailable for the originally scheduled dates. Another 10 changes were made in response to a change in a licensee's schedule or program. The last four changes were caused by our response to the terrorist attacks on September 11, 2001. However, these numbers do not reflect the cancellation of physical protection baseline inspections to address the security advisories following the attacks.

None of the changes were reported as being in response to a conflict with INPO schedules.

IP-6 (EI3a)   Inspection Reports are Timely

Definition: Obtain RPS data on the total number of reports issued and the number issued within timeliness goals (45 days for team and consolidated reports, 30 days for others).

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

Lead: Regions
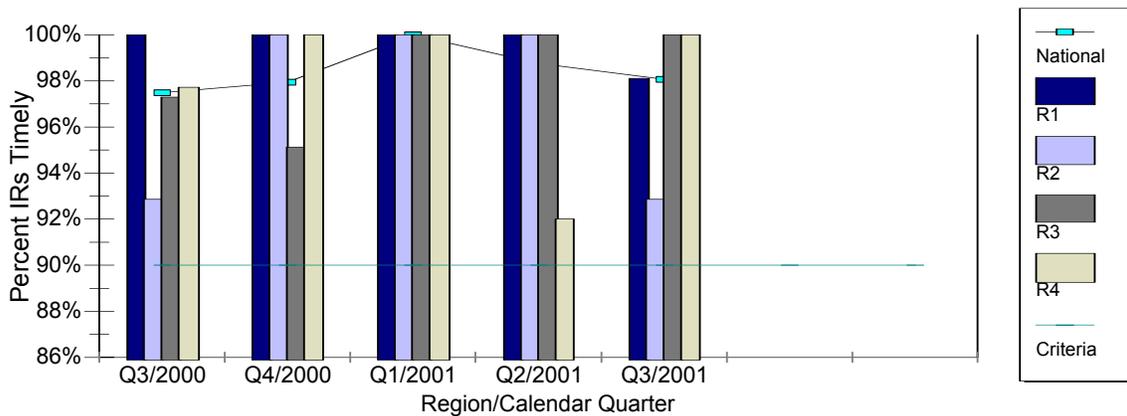
Analysis: The graph reflects a total of 905 inspection reports that were issued from the third quarter of 2000 through the third quarter of 2001. Of these 199 were issued during the third quarter of 2000, 195 were issued during the fourth quarter of 2000 and again during the first quarter of 2001, 161 were issued during the second quarter of 2001, and 155 were issued during the third quarter of 2001.

With few exceptions, these 905 inspection reports were issued within the timeliness goals set by the program. Only 3 reports issued during the third quarter of 2001 were not within the timeliness goals; that record represents better than 98 percent compliance nationwide.

IP-7 (EI3.b)   Temporary Instructions (TIs) are Completed Timely

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

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

Lead: IIPB
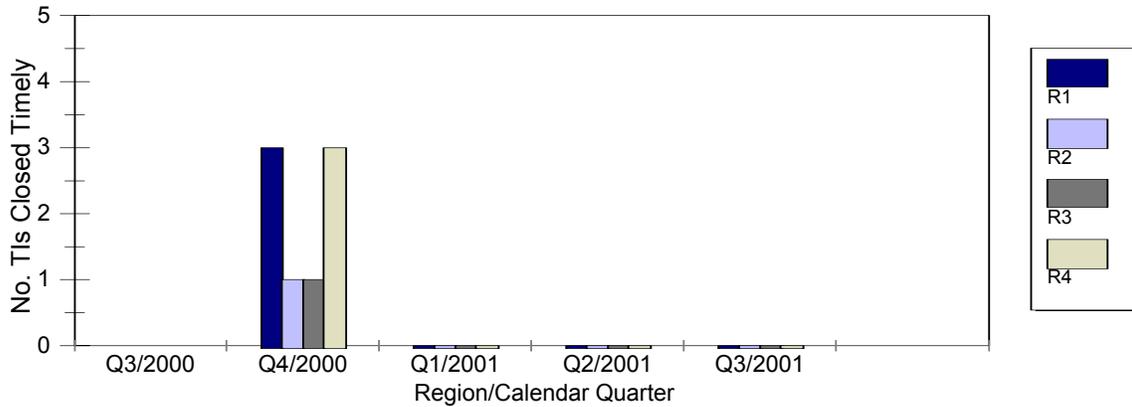
Analysis: No TIs were completed during the third quarter of 2001. One TI expired on January 31, 2001 (2515/144, PI data), and was completed on time. Only one other TI is open (2515/145, CRDM cracking); it was issued on September 20, 2001, and is scheduled to expire 2 years from that date.

IP-8 (CI1a)   **Public Communication Is Timely**

Definition: IIPB posts inspection reports to the NRC's external (public) Web site within ROP timeliness goals using electronic version of inspection reports entered into ADAMS by the regions. IIPB also posts entries from the Plant Issues Matrix (PIM) to the NRC's public Web site using data entered into RPS by the regions. In addition, IIPB records the number of inspection reports not available in ADAMS and the number of PIM entries not updated in RPS, as well as the number of inspection reports and PIMs that are not posted to the NRC's public Web site within goals.

                 IIPB posts issued inspection reports from the previous quarter, using the electronic version in ADAMS, and the associated PIM entries from RPS to the NRC's public web site within 5 weeks after the end of each quarter. IIPB posts additional inspection reports and PIMs within 7 weeks after the end of each quarter to include all findings from the previous quarter.

Criteria: Expect few untimely postings of PIMs or inspection reports, with a declining or stable trend in untimely postings.

Lead: IIPB
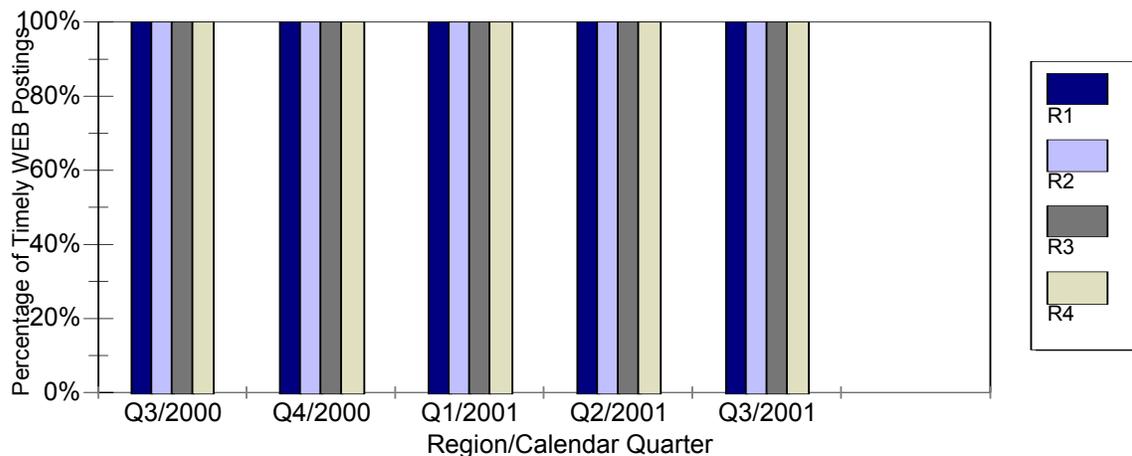
Analysis: Following the terrorist attacks on September 11, 2001, the ROP pages on the NRC's public Web site were disabled. However, the processes for updating the PIM and the Web pages were followed and all information was posted in a timely manner.

IP-9 (CI1.b) Public Communication Is Accurate

Definition: Each calendar quarter, sample information on the NRC's external (public) Web site, collect the number of times and reasons for regions changing PIMs or inspection reports (accuracy, new information) within program requirements.

Criteria: Track and trend

Lead: IIPB, Regions
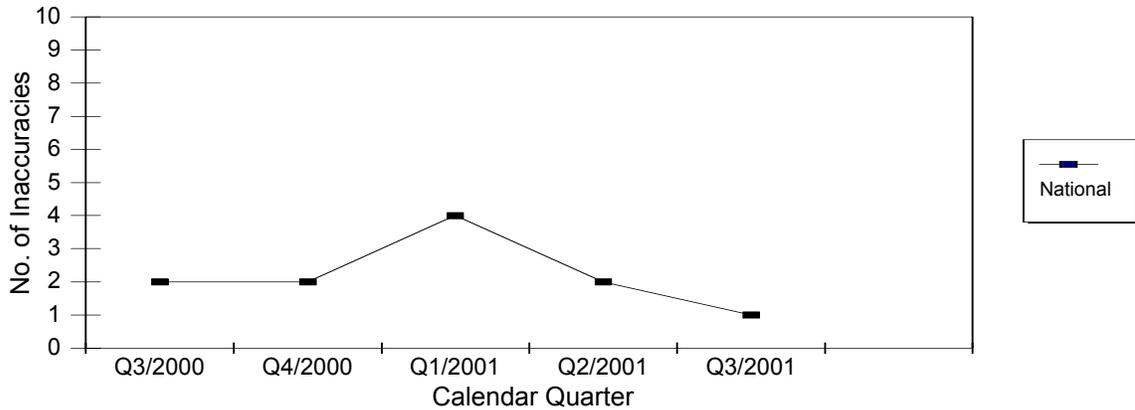
Analysis: Only one error or inaccuracy involving issued or posted inspection data was reported during the third quarter of 2001. Throughout the year the regions have issued more than 900 inspection reports and entered thousands of findings into the PIMs. Over the same period, the number of inaccuracies in that data has been very low.

IP-10 (PI2a)   Analysis of Inspection Hours

Definition: Collect and analyze RPS data (number of samples, regular hours, overtime hours) for each inspection procedure (including Plant Status). Collect preparation and documentation time.

Criteria: (1) Expect no significant deviations, and explore reasons for such deviations.
(2) Track and trend overtime for the baseline inspection program and the underlying reasons, and use first year data to establish a baseline.
(3) Track and trend preparation, documentation, travel, and communication times to establish a baseline, and assess the effects on budgeted resources.

Lead: IIPB

Comments: See table on next page.

Analysis: Only 60 to 80 percent of the baseline inspection program will be completed during the 2001 ROP cycle because the cycle is only 9 months long (April through December). Nationally, the program is on track for completion. However, the full effects of the NRC's response to the terrorist attacks on September 11, 2001, may affect completion of certain portions of the baseline, such as the physical protection inspections.

BASELINE INSPECTION ACTIVITIES
Actual Total Hours vs. Estimated Hours By Region
July 1 – September 30, 2001

Activity Code	Region I (12 single-unit sites) (7 dual-unit sites)			Region II (5 single-unit sites) (12 dual-unit sites) (1 triple-unit site)			Region III (8 single-unit sites) (8 dual-unit sites)			Region IV (8 single-unit sites) (5 dual-unit sites) (1 triple-unit site)		
	Actual Total Hrs*	Est Hours	% O/T	Actual Total Hrs*	Est Hours	% O/T	Actual Total Hrs*	Est Hours	% O/T	Actual Total Hrs*	Est Hours	% O/T
Direct Inspection Effort (BI)	10196	9915	6.8	7271	9631	5.7	8253	8414	9.1	5326	7374	7.2
Inspection Preparation and Documentation (BIP+BID)	8017	9915	2.4	6633	9631	2.7	5865	8414	3.4	4710	7374	5.0
Plant Status (PS)	3462	3115	2.7	3040	3098	1.7	2875	2660	5.1	2480	2345	3.4
Total Staff Hours	21675	22945	4.1	16944	22360	3.8	16993	19488	6.5	12516	17093	5.6
Contractor Hours (est.)	466			0			466			624		
Grand Total	22141			16944			17459			13140		

* Actual total hours = regular hours + non-regular hours

IP-11 (MI1b) Survey of ROP Users

Definition: Survey inspectors and other NRC personnel implementing the ROP, asking whether the inspection program covers areas that are important to safety.

Criteria: Trend average level of agreement.

Lead: IIPB

Comments: The staff did not survey internal stakeholders duing this ROP cycle.

IP-12 (UI2a)   **Survey of Inspection Report Usefulness**

Definition: Survey external stakeholders, asking about the usefulness of inspection reports.

Criteria: Trend average level of agreement.

Lead: IIPB

Analysis: Of the comments received in response to a November 2001 *Federal Register* notice, four answered the question about the usefulness of inspection reports. Those comments indicated that the responders are split on the question. Two answered the question "yes" with qualifications. The other two did not directly answer the question, but the staff interpreted their comments to be "no" answers. All of the responders indicated that the reports either include information they already know, or don't provide all of the information that the responders would like. The comments from industry representatives indicated that the information on inspection results is already known to the licensee; the information that is not included in the report (i.e., observations, insights, and positive findings) that licensees find useful is provided during exit meetings with NRC inspectors, and the reports are more useful for public audiences. The one comment from a State official supported that view. That comment, from the State of Illinois, was that reports provide useful information on violations (and the staff extrapolates that to also include findings not related to violations), but the absence of observations below the level of findings makes them less informative.