

METRIC <sup>1</sup>		OBJECTIVE	RISK-INFORMED	UNDERSTAND-ABLE	PREDICTABLE	MAINTAIN SAFETY	EFFECTIVE, EFFICIENT, REALISTIC	ENHANCE PUBLIC CONFIDENCE	UNNECESSARY REGULATORY BURDEN	DATA <sup>2</sup> COLLECT	SURVEY <sup>2</sup>
PI-1	Consistent results given same guidance	P			S					REG	
PI-2	Questions regarding interpretation of PI guidance		P	S						HQ	
PI-3	Timely indication of declining safety performance					P	S			REG	
PI-4	Minimize licensee actions of unintended consequences					P	S			HQ	I/E
PI-5	Timely PI data reporting						P	S		HQ	
PI-6	Stakeholders perceive appropriate overlap of IP and PIs						S		P	HQ	I/E
PI-7	Reporting conflict reduction			S					P	HQ	E
PI-8	Clarity of PI guidance - NEI 99-02			P						HQ	E

<sup>1</sup> A shaded metric number (e.g., PI-1 ) would indicate a metric that did not meet its criteria. Crosshatched blocks indicate metrics not counted during this reporting period.

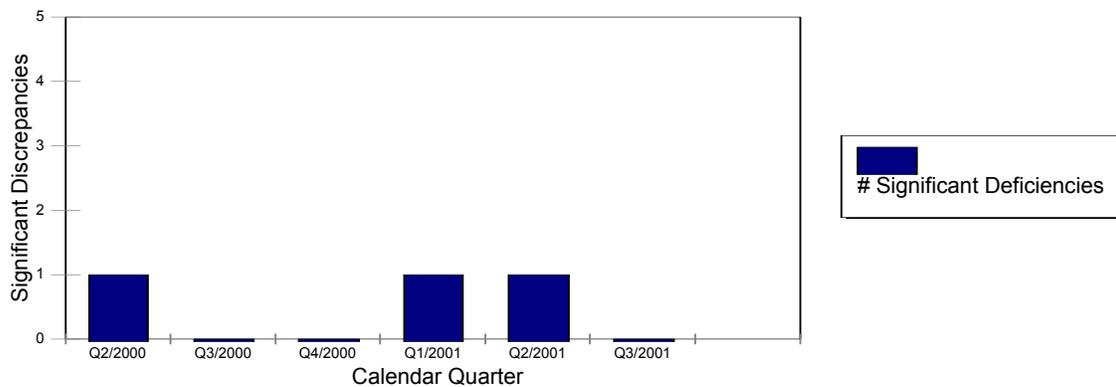
<sup>2</sup> REG = Regions, HQ = Headquarters, I = internal stakeholder survey, E = external stakeholder comments.

**PI-1 (OP1a) Consistent Results Given Same Guidance**

**Definition:** Independently verify PIs using IP 71151, “PI Verification.” Count all PIs that cross a threshold because of significant discrepancies. If a significant discrepancy is identified, it should be recorded in the inspection report and PIM. Regions report quarterly to IIPB across all PIs.

**Criteria:** Expect a threshold of 1. Use the first year of data as a benchmark for future comparison and to establish acceptable range of variability.

**Lead:** Regions



**Comments:** The graph represents the number of significant discrepancies reported during each quarter of the given calendar year. Significant discrepancies are defined as reporting discrepancies that would have caused the PI to cross a threshold that the licensee missed, but the NRC identified during a PI verification inspection.

**Analysis:** The number of discrepancies remains very low. Two significant deficiencies (in Q1 and Q2 of 2001) were identified through PI verification inspections (IP 71151) conducted in 2001. These discrepancies occurred at two different plants.

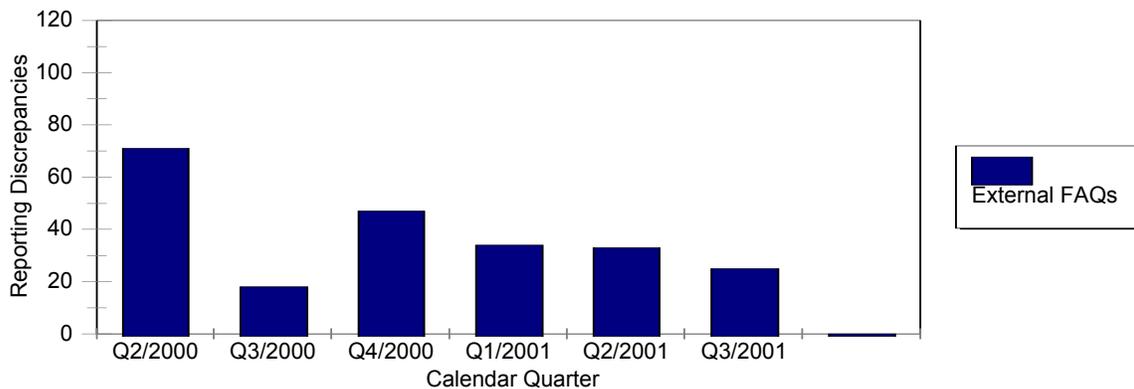
When all data, starting with the full implementation of the ROP, is taken into account, this reflects a stable and decreasing trend. All of the discrepancies occurred in the PI area of unavailability because the licensees fail to count unavailability hours when they should. These PIs have been identified as problematic, and the staff has formed a safety system unavailability (SSU) task force to resolve issues regarding the unavailability PIs.

**PI-2 (OP1b) Questions Regarding Interpretation of PI Guidance**

**Definition:** Quarterly, count the number of frequently asked questions (FAQs).

**Criteria:** Expect low numbers (but not as low as metric PI-1), with a stable or decreasing trend.

**Lead:** IIPB



**Comments:** The graph represents the combined number of new and approved FAQs introduced at the ROP Working Group during each quarter of the calendar year.

**Analysis:** Reporting discrepancies trended downward since the beginning of ROP implementation. Most of the FAQs were related to the mitigating systems cornerstone indicator of unavailability. The number of FAQs regarding interpretation of PI guidance decreased as licensees better understood the PI Program and guidelines. However, when the PI guidance is revised, there tends to be an increase in the number of FAQs generated (which corresponds to licensees gaining an understanding of the new guidance).

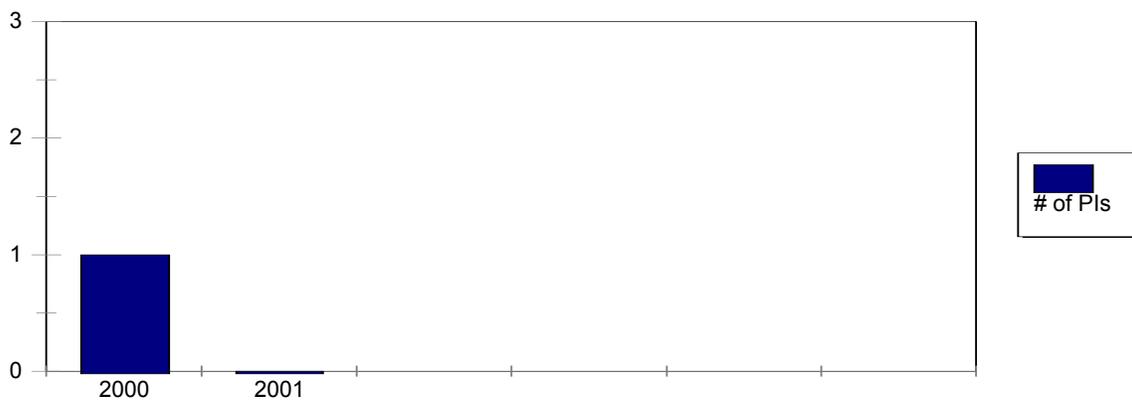
The staff formed an SSU task force to resolve short- and long-term issues associated with the SSU indicators. The task force, which is comprised of internal and external stakeholders, has proposed an unreliability indicator, which will be pilot tested in Summer/Fall of 2002.

**PI-3 (MP1a) Timely Indication of Declining Safety Performance**

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

**Criteria:** Expect low numbers (near zero).

**Lead:** IIPB



**Analysis:** There were no instances in which PIs crossed multiple thresholds in 2001.

For the given parameters that have been included in the PIs, the PIs appear to provide timely indication of declining performance.

**PI-4 (MP2a) Minimize Potential for Licensee Actions Taken in Response to the Performance Indicator Program That Adversely Impact Plant Safety**

**Definition:** Survey stakeholders regarding PIs driving undesirable decisions. This question will be included in the overall *Federal Register* notice.

**Criteria:** Expect low numbers of unintended consequences reported, with a stable or decreasing trend.

**Lead:** IIPB

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

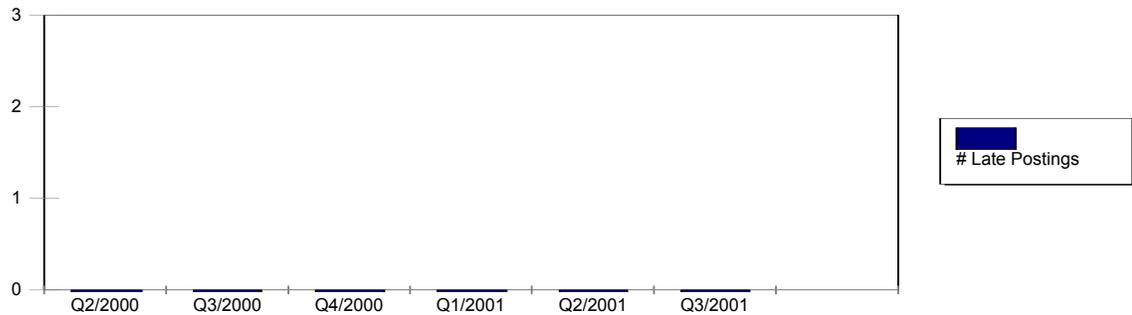
Comments from external stakeholders in response to a *Federal Register* notice are discussed in the Commission paper regarding the 2001 ROP cycle.

**PI-5 (EP2a) Timely PI Data Reporting**

**Definition:** Within 5 weeks after the end of each calendar quarter, track (count) late PI postings on the NRC’s external Web site.

**Criteria:** Expect a low number (near zero) of late PI postings on the NRC’s external Web site.

**Lead:** IIPB



**Analysis:** There have been no late PI data submissions since the inception of the ROP.

**PI-6 (BP1a) Stakeholders Perceive Appropriate Overlap of Inspection Program and PIs**

**Definition:** Survey stakeholders' perceptions of overlap between PIs and the Inspection Program. Ask the question, "Do you think there is an overlap between PIs and the Inspection Program? If so, specifically where is the overlap: In other words, what PIs overlap with what baseline inspection procedures?" These questions will be added to the survey for internal stakeholders and the *Federal Register* notice for external stakeholders.

**Criteria:** Expect a low number of negative comments, with a declining or stable trend in the number of negative comments received.

**Lead:** IIPB

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

The results of the comments received from external stakeholders are discussed in the Commission paper regarding the 2001 ROP cycle.

**PI-7 (BP2a) Reporting Conflict Reduction**

**Definition:** Survey licensees and other external stakeholders regarding the perceived overlap between reporting requirements, such as those promulgated by INPO, WANO, and the Maintenance Rule. This question will be added to the *Federal Register* notice.

**Criteria:** Expect a low number of negative comments, with a declining or stable trend in the number of negative comments received.

**Lead:** IIPB

**Comments:** The results of the comments received from external stakeholders are discussed in the Commission paper regarding the 2001 ROP cycle.

**PI-8 (CP1d) Clarity of PI Guidance - NEI-99-02**

**Definition:** Survey external stakeholders' perceptions regarding the clarity of the guidance contained in NEI 99-02. Add this question to the *Federal Register* notice.

**Criteria:** Expect a low number of negative comments or examples of interpretation issues, with a stable or declining trend in the number of negative comments received.

**Lead:** IIPB

**Comments:** The results of the comments received from external stakeholders are discussed in the Commission paper regarding the 2001 ROP cycle.