

ROP PROGRAM AREA	OBJECTIVE	RISK-INFORMED	UNDERSTAND-ABLE	PREDICTABLE	MAINTAINS SAFETY	EFFECTIVE, EFFICIENT, REALISTIC	ENHANCES PUBLIC CONFIDENCE	REDUCES UNNECESSARY REGULATORY BURDEN
Performance Indicators	1 of 1	1 of 1	1 of 1	1 of 1	1 of 1	2 of 2	1 of 1	None
Inspection	1 of 1	2 of 2	2 of 2	2 of 2	2 of 2	3 of 3	2 of 2	1 of 1
Significance Determination Process	2 of 2	3 of 3	0 of 2	1 of 1	1 of 2	2 of 3	2 of 4	1 of 1
Assessment	2 of 2	2 of 2	3 of 3	2 of 2	2 of 2	4 of 4	3 of 3	1 of 1
Overall ROP	None	None	None	None	None	1 of 1	None	None

The representation “x of y” in each column indicates how many metrics met the related criteria in each category. For example, the “2 of 2” in the Objective column for Assessment program area means that both of the metrics used to measure the objectivity of the assessment process have met their established criteria. The shaded cells highlight those areas in which one or more metrics have not met their established criteria.

The following metrics were not measured for this end-of-year report:

Area	Metric	Reason Not Measured
Performance Indicators	PI-4	External comments discussed in Commission paper; internal survey not taken.
	PI-6	External comments discussed in Commission paper; internal survey not taken.
	PI-7	External comments discussed in Commission paper.
	PI-8	External comments discussed in Commission paper.
Inspection	IP-4	Metric not yet producing usable information, still under development.
	IP-11	Survey of internal stakeholders not taken for this ROP cycle.
Significance Determination Process	SDP-5	Survey of internal stakeholders not taken for this ROP cycle.
	SDP-7	External comments discussed in Commission paper.
	SDP-9	New metric, no data yet available.

Area	Metric	Reason Not Measured
Assessment	AS-9	Survey of internal stakeholders not taken for this ROP cycle.
	AS-10	External comments discussed in Commission paper; internal survey not taken.
ROP Overall	O-1thru O-8	External comments discussed in Commission paper; internal stakeholder survey not taken.
	O-9	Analysis of event responses not completed for 2001.
	O-10	Analysis of significant events not completed for 2001.
	O-11	External comments discussed in Commission paper.
	O-12	Survey of internal stakeholders not taken for this ROP cycle.
	O-14 thru O-19	External comments discussed in Commission paper.

In a November 2001 *Federal Register* notice, the NRC solicited comments from the public on specific questions relating to the ROP. The resulting comments received are discussed in the ROP end-of-year Commission paper. The staff did not survey internal stakeholders during this ROP cycle (April–December 2001), but plans to take a survey in the fall of 2003.

The only measured parameters that did not meet their related criteria were in the Significance Determination Process (SDP). Of the nine metrics counted, three did not meet their established criteria. The three metrics indicate problems with the understandability and effectiveness of the SDP, and the ability of the SDP to maintain safety and enhance public confidence.

The analyses of the metrics in the other program areas provided some insights into each of the areas, some of which need improvement.

#### Performance Indicator Program

Although the number of reporting discrepancies that were significant enough to cause a performance indicator (PI) to cross a threshold remains very low (only three since the inception of the ROP in 2000), the three instances all relate to uncounted unavailability time. The staff formed a task force to resolve issues regarding the safety system unavailability indicators. Proposed changes will remove treatment of fault exposure time from the safety system unavailability indicators, made possible because of the development of a reliability indicator that focuses on the availability of system trains to meet their safety functions in lieu of design basis functions, and risk-inform the green/white threshold for the indicators. This approach will create new indicators that are more risk-informed, and treat unavailability and reliability consistently between the ROP, Maintenance Rule, WANO, and PRA.

The declining trend in frequently asked questions on PI interpretations indicates that licensees are developing a better understanding and are having fewer problems collecting and reporting the indicators.

#### Inspection Program

Although conformance with requirements for documenting inspection findings continues to improve, the NRC staff still needs further improvement in documenting the basis for findings. To address this concern, and to make other improvements in inspection reports, the staff has developed a newly revised manual chapter for reactor inspection reports (IMC 0612). This manual chapter updated and clarified the threshold logic for determining whether an issue should be documented, and now includes specific examples of acceptable documentation.

Counting the number of feedback forms received for each associated program document indicates that those using the ROP have concerns about performance indicators, the significance determination process, and documenting findings. The feedback forms received against Inspection Manual Chapter 0608, Performance Indicator Program, related to interpretations of the industry's guidance (Nuclear Energy Institute [NEI] NEI 99-02, "Regulatory Assessment Performance Indicator Guideline") that may have already been submitted by a licensee through the NRC's frequently asked question (FAQ) process for performance indicators, as well as the NRC's program. The feedback forms regarding interpretations of the industry guidance on reporting the indicators are resolved through the staff's FAQ process. Resolution of these questions could result in a change to NEI 99-02.

As noted above, the guidance for documenting inspection findings has been revised and will be issued shortly. The NRR staff continues to improve the usefulness of the significance determination processes.

#### Significance Determination Process

The three metrics that did not meet their established criteria were accurate SDP notebooks (SDP-6), SDP timeliness (SDP-10), and accurate results communicated to the public (SDP-12). The first two metrics point to SDP weaknesses of which the staff has been aware and are being addressed by an SDP improvement plan. Those weaknesses include several notebooks that don't properly characterize plant systems or equipment, and untimely determination of significance for findings that are potentially greater than green.

The third weakness, accuracy of results communicated to the public, resulted from two distinct causes. About half of the inaccuracies were preliminarily significant issues that were incorrectly identified in their respective inspection reports by a significance color, which was then entered into the plant issues matrix (PIM) portion of the Reactor Program System database and made available on the NRC's external Web site. The other inaccuracies resulted from improperly updating the PIM entries after a final significance determination was made, which meant that the description still identified the issue as "preliminarily significant." As a result, the four NRC regions and NRR's Inspection Program Branch (IIPB) have increased the frequency with which they review the data in the PIM and on the Web site.

#### Assessment Program

Although not deviations from the Action Matrix and few in number, a handful of assessment program letters were not signed by the level of management specified in the program. The guidance was clarified in the program document just before the beginning of the 2001 ROP cycle.

The national average for the time between an assessment letter and completion of any associated supplemental inspection shows a positive trend over the last 5 calendar quarters.

#### Overall ROP

The metrics for overall assessment of the ROP are primarily based on surveys or solicited comments from internal and external stakeholders. Internal stakeholders were not surveyed during the shortened 2001 ROP cycle, but the staff plans to survey the inspectors in fiscal year 2003. The staff also did not receive comments from external stakeholders in response to a November 2001 *Federal Register* notice in time to analyze them for this assessment report. However, those comments are discussed in a Commission paper regarding the 2001 ROP cycle.