

### REACTOR OVERSIGHT PROCESS FEEDBACK PROGRAM

#### 0801-01 PURPOSE

This chapter describes in detail the feedback process and feedback form used by the Office of Nuclear Reactor Regulation (NRR), Division of Inspection Program Management (DIPM), to document problems, concerns, or difficulties encountered in implementing the programs of the NRC's Reactor Oversight Process (ROP).

#### 0801-02 POLICY

The NRC encourages the staff to identify issues that need program level attention and to suggest changes to improve the effectiveness or implementation of the ROP. Although feedback is expected to come mostly from staff who implement the agency's oversight programs, any NRC employee may use the processes described below to make suggestions or recommendations regarding the ROP.

An initial response to acknowledge the feedback received by IIPB will be issued within 10 working days of receipt. DIPM has established a goal to close feedback forms within 90 days. A feedback issue normally will be closed when the actions needed to address the issue have been completed.

#### 0801-03 APPLICABILITY

All NRC employees who have concerns or wish to provide feedback regarding the performance indicator, assessment, inspection, significant determination process, and enforcement programs should follow the procedures outlined in this inspection manual chapter.

The process described herein for NRR's ROP is used to collect and manage feedback on all ROP programs, including the Performance Indicator Program. The method for resolving interpretations of performance indicators is described in Inspection Manual Chapter (IMC) 0608, "Performance Indicator Program."

## 0801-04 RESPONSIBILITIES

04.01 Director, Division of Inspection Program Management. Oversees the feedback program for the ROP.

04.02 Division Directors, Program Offices. Ensures that feedback on their programs is reviewed and that a response is sent to IIPB within 90 days of receipt of the feedback, if possible.

04.03 Chief, Inspection Program Branch (IIPB), NRR. Administers the feedback program for the Reactor Oversight Process. Performs final review on closure for all feedback. Recommends inspector training, as appropriate.

04.04 Chiefs, Technical Branches, NRR. Supervises the resolution of feedback on elements of the ROP within their branch's scope of responsibilities and ensures the final resolution of ROP feedback is approved by the cognizant section chief or designated official. Recommends inspector training, as appropriate.

04.05 Regional Offices. Reviews feedback submitted by their staff and responds to issues and questions within their capabilities within 14 days. Forwards ROP feedback forms to the IIPB feedback coordinator via email (PIPBCAL).

04.06 Feedback Coordinator. Receives and processes feedback forms, ensures management review, and maintains the ROP feedback data base.

04.07 Lead Reviewer. Reviews and resolves feedback forms within their assigned area, coordinates changes to program guidance documents, and ensures the final resolution of feedback is consistent with program guidance and the ROP framework. Recommends inspector training, as appropriate.

## 0801-05 DISCUSSION

NRC staff implementing NRC's programs (particularly inspectors) have first-hand information on licensee performance and directly observe the impact and results of NRC programs and regulatory requirements. Therefore, it is important that the staff are given an opportunity to submit questions, concerns, and suggestions through their regional managers to the program offices.

Program offices need written feedback that explains the originator's suggestions or concerns to make effective changes to the programs. Feedback on ROP programs must be documented on an ROP Feedback Form (Exhibit 1) by the originator.

## 05.01 Reactor Oversight Process Feedback

### a. Documenting ROP Feedback

NRC employees who desire to provide feedback regarding the ROP (i.e., inspection, assessment, enforcement, performance indicators, significant determination process) record their comments and recommendations on the ROP Feedback Form (Exhibit) and send the form to their supervisor. The supervisor reviews the form (see Section 0801-05.01b), signs it, and e-mails the form to PIPBCAL.

Employees submitting feedback forms should address no more than one issue per form. If an issue affects more than one program document (e.g., IMC 0609, "Significance Determination Process," and IMC 0612 (formerly 0610\*), "Reactor Inspection Reports"), the program documents should be indicated on the form.

Information received by the program office through other means (e-mails, agency reports, and in some cases from external stakeholders, etc.) that could affect the ROP is reviewed by an IIPB supervisor and documented on an ROP feedback form if further consideration is necessary.

### b. Management Review of ROP Feedback

Although the following is written from the perspective of a regional office, the guidance applies to any NRC organization that receives ROP feedback forms from its staff.

The originator's management (usually a regional supervisor) reviews the feedback form and responds to the originator when the feedback concerns matters within the region's or program office's responsibilities and when the manager is able to respond directly to the originator. If a region responds in writing to the originator on a feedback form, a copy of that feedback form should be sent to IIPB for information. If the manager is not able to resolve the feedback concern, it is then forwarded to IIPB for resolution. Managers should include their perspective on the originator's feedback. Managers should e-mail the electronic forms to PIPBCAL within 14 days of receiving the form.

### c. Review of ROP Feedback. IIPB manages the final review and resolution of feedback on all aspects of the ROP, and also coordinates all responses to ROP feedback. IIPB assigns a lead reviewer to the feedback form from the program or technical branch responsible for the procedure or area.

1. The IIPB feedback coordinator performs the following:

(a) Receives and processes feedback form within 10 working days. Electronically forwards copy of the processed feedback form to the originator, originator's supervisor, and lead reviewer.

(b) Maintains the ROP feedback data base.

- (c) Receives, from lead reviewer, electronic copy of feedback closure. Reviews feedback and forwards to the appropriate IIPB Section Chief for final concurrence.
  - (d) Regularly provides status reports to management and staff.
  - (e) Posts status reports to ROP web-page.
  - (f) Electronically forwards updates and closure feedback forms to originator, originator's supervisor, assigned regional coordinator and lead reviewer.
2. The lead reviewer performs the following:
- (a) Through the feedback coordinator, responds to the originator and the originator's organization if the feedback can not be responded to in 90 days. At a minimum, this response should describe how the staff intends to address the issue if it cannot be resolved within the 90 days. The initial response is recorded on the electronic version of the feedback form and the form is e-mailed to the originator and the originator's organization.
  - (b) Directly contacts the originator, as needed, to fully understand the feedback.
  - (c) Follows the process in IMC 0608, "Performance Indicator Program," for resolving performance indicator interpretation issues.
  - (d) Sends a final response to the IIPB feedback coordinator after incorporating the comments into the program (or deciding not to). The final response is recorded on the electronic copy of the feedback form.
  - (e) Through the feedback coordinator, gets IIPB Section Chief approval for the final resolution of feedback comments. The approval is recorded on the electronic version of the feedback form.
  - (f) Informs IIPB Feedback Coordinator of the status of the feedback form by recording actions and decisions on the form.
- d. Closing ROP Feedback Forms. IIPB closes a ROP feedback form after it incorporates the comments or suggestions into a program document, if appropriate. In cases where a revision to an inspection procedure or manual chapter is documented, the block on the feedback form "Hold for Issuance of Change Notice" will be checked. The feedback form will remain open until the Change Notice for the inspection procedure or manual chapter is issued. Once the inspection procedure or manual chapter is issued, we will notify the originator of the issuance and close the feedback form. If the resolution of the feedback does not affect a program document, the issue is closed when the approved final response is sent to the originator and the originator's management. IMC 0608

describes the process for resolving performance indicator issues that are documented on ROP feedback forms in accordance with this manual chapter.

END

EXHIBIT

Reactor Oversight Process Feedback Form

**REACTOR OVERSIGHT PROCESS FEEDBACK FORM**

**Feedback Form No.**

(provided by IIPB)

**INSTRUCTIONS**

(1) Originator: send completed feedback form to your supervisor or designated regional contact. (2) Supervisor or regional contact: either respond directly to originator or provide comments, if any, and email feedback form to PIPBCAL.

Inspection Procedure (IP) or  
Inspection Manual Chapter (IMC) Title:  
(cite section, if applicable)

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Inspection Procedure (IP) or  
Inspection Manual Chapter (IMC) Number:

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Performance Indicator Number (if applicable):

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**TOPIC** (check applicable box):

Inspection

SDP

PIs

Assessment

Enforcement

Other

**STATEMENT OF CONCERN/RECOMMENDATION**

(Please limit each feedback form to one concern. State the concern and impact on the program. If describing a PI interpretation concern, (1) state the licensee's interpretation and, (2) state the region's position. Provide recommendations for resolution and identify training needs, if appropriate).

IP/IMC Section:

Comment(s):

Recommendation(s):

Do you think training is part of the solution?

YES	NO

**ORIGINATOR**

Name:	
e-mail:	
Phone No:	
Plant Name (if applicable):	
Date submitted to supervisor:	

**SUPERVISOR'S REVIEW**

Supervisor's remarks (if any):

Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_

**LEAD REVIEWER'S PRELIMINARY RESPONSE**

Assigned to:  Branch:  Phone No:   
 (Lead Reviewer)

Date Lead Reviewer Received Feedback Form:   
Date Feedback Coordinator Acknowledged Receipt to Originator:

Lead Reviewer's remarks:

**HEADQUARTERS FINAL RESPONSE**

Hold for Issuance of Change Notice:  
 (Feedback Form will remain open until the change notice for the IP/IMC has been issued.  
 You will be notified when the IP/IMC has been issued)

YES	NO

Training Recommended:

Response:

Lead Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_  
 IIPB Final Approval: \_\_\_\_\_ Date: \_\_\_\_\_  
 (IIPB Section Chief)