

CHARTER
FOR THE
SIGNIFICANCE DETERMINATION PROCESS
TASK GROUP

Objective

The objective of this Task Group is to conduct an evaluation of the concerns that have been raised with aspects of the reactor safety SDP, and specifically with the Phase 2 process. The concerns are discussed in a DPO dated March 15, 2002, and in the draft Inspector General Audit report forwarded to the OEDO on April 10, 2002, or the final Audit report when issued.

The Task Group must address the issue of whether the existing Phase 2 approach of the reactor safety SDP should be continued, modified, or replaced. Any recommendation for modification or replacement of the Phase 2 approach should be made with associated specific recommendations for modification or a specific alternative approach including an appropriate pro/con analysis relative to the ROP and SDP objectives and the four NRC performance goals.

Provided for your convenience is a listing of applicable documents and correspondence, which contain recent dialogue on the purpose, design, and application of the SDP within the established ROP framework.

Scope

I. The Task Group should become familiar with the ROP/SDP objectives stated in SECY-99-007, SECY-99-0007A, and in Manual Chapter 0609, which guided the development and continue to guide the use and refinement of the reactor safety SDPs. Any recommendations for changes should be specific and bases should be provided.

II. The Task Group should address, but not be limited by, the following questions. The Task Group should also consider the other issues raised in the DPO Panel Report and the OIG Audit Report. The Task Group shall specifically address the key issues identified in the EDO tasking memorandum of August 6, 2002 (see Background), as given below.

Does the current reactor safety SDP appropriately support the SDP and ROP objectives stated in SECY-99-007, SECY-99-007A, and in Manual Chapter 0609? Consider:

Is the performance expectation for the SDP and the associated process tools clear and appropriate?

Is the applicability of the current SDP to the range of possible inspection findings clearly articulated in program guidance?

Is the consideration of uncertainty currently incorporated into the process sufficient for the purposes of the ROP?

Does the ROP appropriately allow for (e.g., Action Matrix deviations) consideration of other inputs, e.g. information that is independent of a best-estimate risk assessment used as a basis for an SDP result? If not, should an SDP result be influenced by consideration of other inputs that are independent of a best-estimate risk assessment?

Are expectations for inspector use of the reactor safety SDP appropriate and reasonably achievable?

Does the approach of providing the Phase 2 tool as part of the reactor safety SDP meet the SDP objectives, considering the relative efficacy and cost/benefit of this approach versus alternative approaches such as greater reliance on risk analysts and computer-based models (DPO Panel recommendation #1)? If so, is the current Phase 2 tool acceptable for continued use and refinement per the established SDP Improvement Initiative (and if not, what changes should be made)? If not, describe a recommended alternative approach to meet the SDP and ROP objectives consistent with the SDP/ROP objectives.

Overall, is the risk-informed SDP being implemented by the most appropriate agency personnel?

Are continuing improvements to SDP training and guidance warranted?

Aside from any specific recommendations made in addressing the above questions, does the panel recommend any other ROP process changes, given the accumulation of over two years of ROP experience?

Expected Product and Schedule

The Task Group will address the above questions, including providing appropriate recommendations and applicable pro/con analysis, in the form of a written report. In addition, the report should also recommend the relative importance (priority), sequence, and schedule needed for actions to implement suggested recommendations.

Staffing

The Task Group will consist of the following members:

Chairperson:	Victor McCree	(Region II)
Senior Resident Inspector:	Darrell Roberts	(currently at NRR)
Senior Resident Inspector:	Laura Dudes	(currently at NRR)
Regional Senior Reactor Analyst:	James Trapp	(Region I)
NRR PRA Expert:	Gareth Parry	(NRR)
NRR PRA Expert:	Ian Jung	(NRR)
RES Representative (with PRA):	Hossein Hamzehee	(RES)
External PRA Expert (part-time)	Dana Kelly	(TTC PRA contractor)
Admin Support:	Catherine Raynor	(NRR)

The Task Group should solicit input from a broad spectrum of other involved staff persons, including resident and region-based reactor inspectors, regional management, and NRR (e.g. DIPM, DSSA, DE) staff.

Senior Management Interface

A Steering Committee consisting of Gary Holahan, John Craig, Robert Pierson, and James Caldwell will provide counsel and guidance to the Task Group. The Task Group should periodically brief the Steering Committee on the status of the effort and provide early identification of significant concerns as appropriate.

Should any schedule or resourcing problems arise that could impact the approved schedule, the Task Group, through the Steering Committee, should immediately notify the Director of NRR.

SUGGESTED BACKGROUND DOCUMENTS FOR REVIEW

1. The objectives of the ROP development effort are defined in SECY-99-007:

“Improve the objectivity of the (reactor) oversight processes so that subjective decisions and judgment were not central process features.

Improve the scrutability of these processes so that NRC actions have a clear tie to licensee performance.

Risk-inform the processes so that NRC and licensee resources are focused on those aspects of performance having the greatest impact on safe plant operation.”

2. Use of the risk metrics of delta CDF or delta LERF as the measures by which inspection findings affecting reactor safety, within the ROP, would be characterized for risk/safety significance. Per SECY-99-007:

“The new (ROP) process is designed to be risk-informed. The risk significance of performance data is the primary determinant of data significance in the process, particularly in the new risk-informed baseline inspection program. PI [Performance Indicators] and cornerstone inspection area thresholds include risk insights, where applicable.”

Further detail on the process for determining the risk significance of performance data resulting from inspections is given in SECY-99-007A.

3. The purpose and objectives of the Significance Determination Process, as defined in Inspection Manual Chapter 0609, dated 04/30/02, Sections 01 and 02:

“0609-01 PURPOSE

The Significance Determination Process (SDP), uses risk insights where appropriate, to help the NRC inspectors and staff to determine the safety significance of inspection findings. Each SDP supports a cornerstone associated with the strategic performance areas as defined in Inspection Manual Chapter 2515. The SDP determinations for inspection findings and the PI information are combined for use in assessing the performance of licensees in accordance with guidance provided in Inspection Manual Chapter 2515, ‘Operating Reactor Assessment Program.’

0609-02 OBJECTIVES

02.01 To characterize the significance of an inspection finding for the NRC licensee performance assessment process, using risk insights as appropriate.

02.02 To provide all stakeholders an objective and common framework for communicating the potential safety significance of inspection findings.

02.03 To provide a basis for assessment and/or enforcement actions associated with an inspection finding.

02.04 To provide inspectors with plant-specific risk information for use in risk-informing the inspection program.”

4. The following correspondence:

ML013550087 Staff response to ACRS comments on the SDP (1/10/02)

ML020110121 Staff response to RIV & OE request for review of SDP(1/15/02)

ML020420587, ML020370605, ML020420589 Staff response to DPV (2/18/02)

ML020920470 Staff response to Commission SRM (2/5/02)

ML020440182 (pkg.) SDP Improvement Plan issuance (3/18/02)

G20020209 Staff comments on OIG draft audit report on the SDP (5/14/02)

ML021760004 Response to SRM M020319 Differences between SDP, ASP, & INES (7/12/02)

ML021750054 Expectations for Inspector Use of the SDP (8/9/02)

“Understanding Risk - Informing Decisions in a Democratic Society,” (summary), National Academy Press, 1996

5. Documents related to SDP results and analyses for:

Cooper environmental qualification finding

Indian Point steam generator tube degradation finding

Davis-Besse reactor vessel head degradation significance characterization (no finding yet)

any other specific case of interest to the Task Group.

6. ROP Program Guidance

Inspection Manual Chapter 0609