



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555-0001

September 24, 2001

*Handwritten initials/signature*

*Handwritten notes*

MEMORANDUM TO: John T. Greeves, Director  
Division of Waste Management

FROM: Larry W. Camper, Chief  
Decommissioning Branch  
Division of Waste Management

*Handwritten signature of Larry W. Camper*

SUBJECT: WORK PLAN FOR PROGRAM EVALUATION OF CHANGES TO THE  
DECOMMISSIONING PROGRAM

I have attached the FY 2002–FY 2003 Work Plan for the Program Evaluation of Changes to the Decommissioning Program, which we have revised based on our August meeting with you. This Work Plan completes the milestone identified as *A.1 Develop a plan for conducting a Program Evaluation of the NMSS decommissioning program (actual Program Evaluation will be conducted during FY 02-03)* within the Leadership Level Operating Plan under Performance Goal 3, Strategy 2. This milestone was scheduled for September 30, 2001.

Recall that we considered including an IMPEP Review of the Decommissioning Program as a component of the program evaluation, but determined that it would be overly resource intensive. However, the approach being proposed does provide an independent, external component (e.g., ACNW and stakeholder comment for selected issues) which should serve to lend credibility to the evaluation.

CONTACT: Robert L. Johnson, NMSS/DWM  
(301) 415-7282

Attachment As stated

Enclosure 1

## WORK PLAN FOR FY 2002-2003

### PROGRAM EVALUATION OF CHANGES TO NRC'S DECOMMISSIONING PROCESS (September 19, 2001)

#### Purpose

The purpose of this work plan is to provide guidance for conducting the Decommissioning Program Evaluation identified in the NRC's Strategic Plan for FY 2000-2005. This plan provides background, objectives, scope, approach, final product description, team assignments, milestones, schedules, and resource estimates.

#### Background

Under the Government Performance Results Act (GPRA), agencies are required to conduct and report on Program Evaluations in selected areas. The following guidance from OMB and NRC is relevant to planning and conducting the Decommissioning Program Evaluation. OMB Circular No. A-11 provides the following guidance on program evaluations:

Two types: 1) assessments of the extent to which programs achieve intended objectives and 2) assessment of program implementation policies, practices, and processes.

Findings and recommendations should be summarized in the agency's annual performance report for the year the evaluation was completed. A note should also be included giving the availability of a complete copy of the evaluation.

NRC's Strategic Plan for FY 2000-2005 states that NRC's future program evaluations will:

- 1) increasingly focus on the performance of its programs and activities and
- 2) assess the extent to which NRC has attained the expected results in its strategic and performance goals, strategies, and measures and provide insight for changing the agency's strategic direction.

In NRC's Performance Report for FY 2000, it is stated that program evaluations help Congress and others determine the validity and the reasonableness of the agency's goals and strategies and identify factors likely to affect achieving them.

NRC's Strategic Plan for FY 2003-2005 identifies the objective, scope, and general schedule for the program evaluation entitled *Changes to the Decommissioning Process* (see Attachment 1) referred to in this work plan as the Decommissioning Program Evaluation. Under the following section on scope, eleven ongoing and planned changes to the decommissioning program are identified that are intended to focus the evaluation

## Objectives

NRC's FY 2003-2005 Strategic Plan identified the following objectives:

1. Evaluate the effectiveness of the decommissioning program in achieving the four performance goals and implementing strategies.
2. Evaluate the 11 changes to the decommissioning program (see list of changes under Scope).
3. Recommend changes to current goals, strategies, and measures/metrics for the decommissioning program.

## Scope

The scope of the Decommissioning Program Evaluation is focused on NMSS's portion of the Decommissioning Program within the Nuclear Waste Safety Arena. This includes materials decommissioning and the portion of reactor decommissioning for which NMSS is responsible. The scope does not include decommissioning for which NRR holds responsibility.

Consistent with the objectives, the scope consists of the following:

1. Overall program effectiveness in achieving the four performance goals and implementing strategies in NRC's FY 2003-2005 Strategic Plan.
2. Ongoing and planned changes to the decommissioning program. This includes the 11 changes that were identified in the NRC's Strategic Plan and other important changes that have been identified subsequent to the publication of the Strategic Plan.

Changes identified in the Strategic Plan:

1. Pilot program for decommissioning simple sites
2. Phased review of decommissioning plans
3. Resolution of institutional control issues
4. Terminated License Review Project
5. Transfer of sites to Pennsylvania
6. Stakeholder feedback on SRP
7. Risk informed review of guidance/guidance consolidation
8. Improved stakeholder outreach
9. More realistic dose modeling
10. Reactor license termination plan review process
11. Stakeholder feedback on reactor license termination plan public meetings

Other changes

12. Rebaselining
13. Inspection efficiency
14. Reactor inspection budget model
15. NMSS-NRR interface for reactor decommissioning

FY 2001-2002 will be the subject of this program evaluation. This provides two years of implementing the Decommissioning Program under the new Strategic Plan goals, strategies, and measures. The two years also gives time to gain a range of implementation experience for many of the programs' changes that were just being started in FY 2001, such as the Decommissioning SRP issued in October 2000 and various streamlining and rebaselining initiatives started in early FY 2001.

### Approach

The staff's approach is to conduct both staff and independent evaluations. The findings of these evaluations will then be consolidated to make conclusions and recommendations about the overall program

Conduct evaluations:

1. Staff Evaluation of Program Effectiveness: Internal staff evaluation of program effectiveness in achieving performance goals and strategies. Summarize results of annual PBPM performance reviews for FY 2001 and FY 2002.
2. Staff Evaluation of Program Changes: Internal staff evaluation of 15 program changes. Use completed evaluations (e.g., Pilot Program) and new evaluations of ongoing changes (e.g., SRP implementation and guidance consolidation/risk review of guidance)
3. Independent Party Evaluation of Selected Program Changes: Staff will summarize and provide the results of evaluations of selected changes by parties that are independent of DWM's Decommissioning Program. This will include use of the results of ongoing oversight reviews by the ACNW on selected technical issues (e.g., more realistic dose modeling and risk informed guidance). It will also include an evaluation by the NMSS Risk Group of how the decommissioning guidance and review process is risk informed. Finally, it will also include external stakeholder comments on selected changes such as the pilot program and guidance consolidation (including SRP feedback) where comments from stakeholders have been part of the process.

The objectivity of the program evaluation will be enhanced by the staff's approach of complementing the internal staff evaluations with some specific evaluations by parties independent of the staff responsible for the Decommissioning Program. Some of these parties are outside of the NRC staff, such as the ACNW. Other parties are outside of NRC, such as licensees and Agreement State reviewers of the staff's guidance. These

independent evaluations have been planned to minimize expenditure of limited resources. To accomplish this, the staff's approach makes full use of ongoing and already-budgeted evaluations by the ACNW and results of the public comment process on some of the staff's projects

### Final Product Description

Two products will document the results of the Decommissioning Program Evaluation for different audiences. The first product is the formal Program Evaluation Report prepared by the Program Evaluation Team giving the findings of the individual evaluations together with conclusions and recommendations. This report is intended primarily for internal use by NRC management to assist in future planning for the Decommissioning Program, but must be available to the public

The second product is a summary of the Program Evaluation that OMB requires to be included in NRC's FY 2003 Performance Report. Although this is the primary way to provide the results of the Program Evaluation to external parties, OMB also requires a note be included in the Performance Report indicating the availability of the complete Program Evaluation Report

### Milestones and Schedule

#### FY 2002

Develop evaluation procedures/criteria/preparations 09/02

#### FY 2003

Conduct evaluations and prepare draft findings 03/03

Prepare draft conclusions and recommendations 05/03

Complete final Program Evaluation Report and summary 09/03

#### FY 2004

Submit completed summary for FY 2003 Performance Report 11/03

### Proposed Evaluation Team

Staff evaluation team: Team lead TBD (from team members listed below)

Team members: Robert Johnson, DWM/DCB  
 Nick Orlando, DWM/DCB  
 John Buckley, DWM/DCB  
 Rich Turtill, DWM  
 Ken Datillo, PMDA  
 Mark Roberts, Region I  
 Mike Masnik, NRR

Resources

The FY 2003 budget request did not contain an explicit line item for the program evaluation, but it was included under Policy and Issue Resolution in the C-3, which has a total resource estimate of 1.7 FTE for FY 2002 and FY 2003. 1.0 FTE of the total 1.7 FTE covers the DWM Technical Assistant position, leaving just 0.7 FTE available for this program evaluation and other policy-related tasks.

The resource estimate for this activity is as follows:

	<u>FTE</u>
<u>FY 2002:</u> 0.2	
Develop evaluation procedures/criteria/preparations	0.2
<u>FY 2003:</u> 0.4	
Conduct evaluations and prepare conclusions/recommendations	0.3
Complete final program evaluation report and summary	0.1
<u>FY 2004:</u> 0.0	
Submit completed summary for FY 2003 Performance Report	0.0