

November 26, 2003

MEMORANDUM TO: James T. Wiggins, Deputy Regional Administrator, RI  
Loren R. Plisco, Deputy Regional Administrator, RII  
Geoffrey E. Grant, Deputy Regional Administrator, RIII  
Thomas P. Gwynn, Deputy Regional Administrator, RIV  
Frank J. Congel, Director, Office of Enforcement  
Suzanne C. Black, Director, Division of Systems Safety and Analysis/NRR  
Scott F. Newberry, Director, Division of Risk Analysis and Application/RES

FROM: Bruce A. Boger, Director */RA/*  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: MITIGATING SYSTEMS PERFORMANCE INDEX PILOT REVIEW

The Division of Inspection Program Management (DIPM/NRR) has been working with the Office of Research (RES), the regions, and industry representatives to improve the safety system unavailability (SSU) performance indicator (PI) of the Reactor Oversight Process (ROP). A Mitigating Systems Performance Index (MSPI) pilot program was conducted over the past 12 months as a potential SSU PI replacement and was completed in September of this year. DIPM staff and other internal and external stakeholders of the ROP Working Group are currently in the process of determining whether the MSPI satisfies and meets the requirements of the ROP as a suitable replacement to the SSU PI, as well as an appropriate risk tool within the scope of the MSPI to replace certain aspects of the significance determination process (SDP).

To support and aid the staff in its evaluation of the adequacy of the MSPI, I request that you address the questions in the attached form, including the identification of the pros and cons of the MSPI as it currently is defined and your basis for or against full ROP implementation of the MSPI. Your evaluation should consider the RES September 30, 2003, preliminary draft report on the MSPI, industry MSPI position papers, and consideration of the success criteria outlined in Regulatory Issues Summary 2002-014, "Proposed Changes to the Safety System Unavailability Performance Indicators." Any existing NRC inspection effort or other activities in related areas (e.g., maintenance rule oversight) should be considered in your evaluation. If you conclude that the MSPI should not be implemented as presently proposed by industry, please identify possible changes that may change your view on implementation.

As you may be aware, on December 16, 2003, we are conducting an internal meeting to discuss the pros and cons of the MSPI. Please be represented at the meeting and use the insights gained in your overall evaluation. I request that the result of your MSPI evaluation with recommendation for or against MSPI implementation be forwarded to John Thompson by December 22, 2003. If you have any questions or need any of the above documents, Mr. Thompson can be reached at 301-415-1011 or e-mail him at [JWT1@NRC.gov](mailto:JWT1@NRC.gov).

Attachment: As Stated

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NAME	JThompson	JAndersen	SRichards	BBoger
DATE	11/25/03	11/25/03	11/25/03	11/26/03

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## COMMENTS ON THE MITIGATING SYSTEMS PERFORMANCE INDEX

Please address the following in your response:

Name:

Office:

Date:

Positive Attributes of the MSPI:

Negative Attributes of the MSPI:

Actions that could be taken to reduce negative attributes (e.g., inspection checklist):

General comments on MSPI, if any:

Overall MSPI implementation recommendation:

Attachment