

Please supplement the previously anonymously submitted comments on the Reactor Oversight Process with the following additional discussion on the need for cornerstone benchmarking:

How/when can cornerstones/significant portions of performance under a cornerstone be removed from the action matrix and how is the action matrix re-baselined to account for that action?

Example: At the beginning of the ROP, physical security was determined to be a necessary cornerstone for evaluating overall plant performance. In the first two years of full implementation of the ROP, a number of physical security findings resulting from the evaluation of force on force drills were considered as potentially of more than very low significance and in fact there were some white or greater findings made in this area. Subsequently, SDP evaluation of force on force drills was suspended. With that suspension, the one portion of physical security performance that had in the past contributed significant findings to the action matrix was no longer going to provide indications of declining overall performance. Was the effect on the action matrix of this decision considered? Since the action matrix was not apparently modified in any way to compensate for this loss of potential future findings, one of two conclusions can be reached: a) the action matrix as now implemented has a reduced ability to detect declining overall performance. Unacceptably reduced? How is that determined? or 2) physical security (or a significant previous component of that cornerstone) is not a necessary input to the action matrix to detect declining overall performance.

Note: This example is meant to illustrate a potential issue with the action matrix and its inputs only. The comment in no way implies that oversight of physical security is inadequate. The point is that if physical security, any other cornerstone, or significant performance contributor to a cornerstone was once but is no longer being considered as an input to the action matrix how is the overall effect of that change evaluated and, as necessary, the action matrix compensated to ensure early enough detection of declining overall performance?

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