

April 29, 2004

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FROM: Terrence Reis, Manager */Signed by Samuel S. Lee/*
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SUBJECT: PLAN FOR IMPLEMENTING REACTOR OPERATING EXPERIENCE
TASK FORCE RECOMMENDATIONS

PURPOSE

In a memorandum dated January 9, 2004, the Reactor Operating Experience (OpE) Steering Committee advised that the OpE Task Force report recommendations be implemented and that the details, including schedule and resource estimates, be developed by a coordinated effort of the Office of Nuclear Regulatory Research (RES) and the Office of Nuclear Reactor Regulation (NRR) line organizations currently responsible for the OpE program (ADAMS Accession No. ML040080005). The purpose of this memorandum is to provide the plan for implementing the Task Force recommendations.

BACKGROUND

In a memorandum dated April 25, 2003, the OpE Steering Committee tasked the OpE Task Force to evaluate the agency's reactor OpE program and to recommend specific program improvements (ADAMS Accession No. ML031200535). This task would also address the recommendations of the Davis-Besse Lessons Learned Task Force on OpE program effectiveness as described in the March 7, 2003, OpE Action Plan (ADAMS Accession No. ML030660063).

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On November 26, 2003, the OpE Task Force issued its report on the agency's existing reactor OpE program (ADAMS Accession No. ML033350063). The report made 24 recommendations to improve the program's effectiveness. These recommendations are listed in Attachment 1.

In a Commission briefing on February 27, 2004, the staff informed the Commission that many of the recommendations were "direction setting in nature" and thus could not be implemented readily. The staff committed to prepare an implementation plan by April 30, 2004. The staff also committed to develop the framework for the program by December 31, 2004.

On March 17, 2004, a team called the Implementation Planning Team (IPT) consisting of three NRR and one RES staff began work to develop the plan. This memorandum constitutes this plan and it addresses implementation of 21 of the 24 OpE Task Force recommendations.¹

On April 8, 2004, the IPT briefed the NRR Executive Team, the NRR Leadership Team, and several senior RES managers on the development of the implementation plan. They, in turn, endorsed the implementation approach and agreed on the proposed schedule, deliverables, and resource needs. They also agreed to create a new steering committee, composed of division level managers from NRR, RES, and OCIO, to provide senior management oversight of the implementation of the recommendations. It is expected that the steering committee will delegate the authority to make the implementation decisions for the offices.

IMPLEMENTATION PLAN

Implementation Phases, Schedule, and Resource Requirements

The recommendations will be implemented in four phases:

- Phase I involves the development of the framework for the OpE program. The milestone is completion of Phase I by December 31, 2004. The principal deliverable is a draft management directive and accompanying handbook. The management directive and handbook will describe the OpE program and will contain information that addresses OpE Task Force's recommendations. The management directive and handbook will be designated MD 8.x, "Reactor Operating Experience Program."² Phase I is discussed in the next section and in the attachments. We expect Phase I to require four FTEs.
- In Phase II, the infrastructure of the OpE program will be completed through the development of office-level implementing procedures and necessary staff training. We

¹ Of the three remaining recommendations, two relate to the RES Generic Issues Program and can be performed by the line organization in RES. The specific recommendations are 6.3.1 and 6.3.3 of Attachment 1. The third recommendation relates to the adequacy of NRC requirements governing the use of OpE and requires no action (Recommendation 5.3 of Attachment 1).

² The Task Force recommended that MD 8.5, "Operational Safety Data Review," be updated. This MD addresses both the reactor and materials arenas and the planning team has decided it is more appropriate to create a new MD dedicated to the reactor program.

did not estimate the milestone and expected resource needs because it is not prudent to commit to implementation of a program before it is developed and FY05 resources have already been set.

- Phase III is the “utilization” or the “full implementation” of the newly established OpE program.
- In Phase IV, the staff will conduct an assessment of the effectiveness of the OpE program after one year of implementation.

As Phase I nears completion, this plan will be updated to provide further details for accomplishing Phases II and III portions of the implementation.

Phase I Strategy

The OpE Task Force report stated that, in addition to clearly defined roles and responsibilities, an effective reactor OpE program should have the attributes of efficient collection, storage, and retrieval of OpE information; effective screening of OpE for follow up evaluation; timely communication of OpE to stakeholders (for information or for evaluation); timely and thorough evaluations of OpE; timely decisions on implementation; and periodic assessments of the OpE program. A detailed description of the objectives and attributes of an effective OpE program, as defined by the Task Force, are provided in Attachment 2.

Central to the Task Force’s recommendations was the establishment of an OpE Clearinghouse to ensure that the attributes of an effective OpE program are achieved. A graphical representation of the Clearinghouse and its interrelationships is provided in Attachment 3. One-third of the recommendations are directly related to the development of a functional Clearinghouse. The remainder of the recommendations vary widely in complexity and scope, but they are all related to achieving the defined objectives and the attributes of an effective OpE program. The nature, variation, and complexity of the recommendations led the planning team to conclude that the recommendations could not be individually delegated to individuals or organizations for development and implementation. A more integrated approach is necessary.

For efficiency’s sake, we binned 21 recommendations into four modules. This categorization scheme bundles related recommendations to one of four modules. The first module is the Clearinghouse Module and it will address seven of the Task Force recommendations. The second module, the Management Directive/Handbook Module, involves the development of a draft management directive and handbook for the agency’s reactor OpE program. The MD and the handbook will serve as the governing documents for the OpE program. This module will address eight of the Task Force recommendations. The third module is the Information Technology/Knowledge Transfer Module. It has two objectives: (1) to build effective IT tools for the OpE program functions and (2) to enhance the knowledge transfer of OpE. This module will address two of the Task Force recommendations. The fourth module, Effectiveness Assessment Module, requires the development of the processes for assessing the effectiveness of the OpE program, both internally and externally. This module will address four of the Task Force recommendations. Attachment 4 (Figure 1) provides a graphical representation of the four modules and the recommendations each module will address.

Module and Framework Development Approach

Successful completion of each of the four modules will result in the OpE program framework necessary to achieve the December 31, 2004, milestone. We took the following approach for developing each of the four modules.

First, we identified the functional requirements for each module. For example, we answered the question, "what functions do we want the Clearinghouse (after fully staffed, tooled, and established) to perform?" Based on these functional requirements, we identified the specific tasks necessary to develop an "infrastructure," a process, or a product meeting those functional requirements. Then we estimated the resources for building the framework. Now, the implementation team needs to perform these tasks.

Attachment 4 provides a graphical description and a more detailed explanation of each module. The functional requirements for each module and the tasks necessary for developing the framework of each module are also identified.

The framework developed for the Clearinghouse, Effectiveness Assessment, and IT/Knowledge Transfer Modules will be folded into the draft MD/Handbook. The completion of this draft MD/Handbook by December 31, 2004, will mark the completion of Phase I. The resources required to accomplish Phase I tasks by this due date are estimated to be four FTEs. Currently three NRR and one RES staff members are dedicated to the effort. As the framework is developed, more participants from several organizations within the agency are expected to assist on a part-time basis. Designated contacts representing the following organizations will be needed: NRR (DIPM, DRIP, DE, DLPM, DSSA, and PMAS), RES (DET, DRAA, and DSARE), NSIR, the Regional Offices, and the Offices of the Chief Information Officer, Administration, and Human Resources (Reactor Technology Training Component).

Attachments: As stated

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