

Status of Implementation Issues

SECY-04-0053, "Reactor Oversight Process Self-Assessment for Calendar Year 2003," dated April 6, 2004, included a listing and status of previous issues related to implementation of the Reactor Oversight Process (ROP) for which additional actions were planned by the staff. SECY-04-0053 also discussed commitments and actions that the staff had planned as a result of the ROP self-assessment for calendar year (CY) 2003. Those issues that were closed during CY 2003 as noted in SECY-04-0053 were not carried forward into this year's self-assessment. The Commission also directed the staff to consider additional issues as detailed in several staff requirements memoranda (SRMs). The Davis-Besse Lessons Learned Task Force (DBLLTF), the Office of the Inspector General (OIG), the Efficiency Focus Group, the Advisory Committee on Reactor Safeguards (ACRS), the Significance Determination Process (SDP) Task Group, and other interested stakeholders have also produced reports with recommended improvements to the ROP program.

During the CY 2004 self-assessment period, the staff resolved many of these issues and made progress toward resolving several others. The issues in each program area that were discussed in the above-noted documents along with their status as of the completion of the CY 2004 self-assessment are summarized below. Those issues that were closed during CY 2004 are so noted and will not be carried forward into next year's self-assessment. The Reference column denotes the origin of each issue and/or the last official document that the issue was discussed in. The staff actions to address the issues listed below are discussed in the respective program area assessments or in other areas of the paper, as noted in the Status column.

Issue	Reference	Status
Performance Indicator (PI) Program		
Improvements to address problems in the Safety System Unavailability (SSU) PI (e.g., the Mitigating Systems Performance Index)	SECY-04-0053	In progress, see Attachment 1
Potential unintended consequences of the Unplanned Power Change PI	SECY-04-0053	On hold, see Attachment 1
Develop improved Barrier Integrity cornerstone PIs	SECY-04-0053, DBLLTF item 3.3.3.3	In progress, see Attachment 1
Clarify the guidance for the Safety System Functional Failure (SSFF) PI	SECY-04-0053	In progress, see Attachment 1
Review ACRS recommendations concerning the white/yellow and yellow/red thresholds	SECY-04-0053, SRM dated 12/20/01	Under consideration, see Attachment 1
Pursue the development of PIs for the cross-cutting issues	SECY-04-0053	In progress, see Attachment 1

Issue	Reference	Status
Continue to evaluate the Scrams with Loss of Normal Heat Removal PI	SECY-04-0053	In progress, see Attachment 1
Continue reassessment of the PI program, including the need to develop new indicators to supplement or replace the existing indicators, enhancements to the FAQ process, and whether some PI thresholds should be performance-based rather than risk-informed	SECY-04-0053	In progress, see Attachment 1
Review INPO's final product regarding Consolidated Data Entry	SECY-04-0053	Closed, see Attachment 1
In developing improved, risk-informed PIs, the staff should try to recover the MSPI efforts before initiating new efforts. The staff should work with stakeholders to develop clear requirements for PIs so the PIs are indicative of performance within the related cornerstone of safety	SRM dated 05/27/04	In progress, see Attachment 1
Perform an evaluation of the usefulness of current performance indicators for enhancing agency planning and response	FY 2004–2009 Strategic Plan, Appendix B, and NRR's management control plan (ref. ML043370410)	Closed, see Attachment 1
Inspection Program		
Develop inspection guidance pertaining to reactor coolant system unidentified leakage	SECY-04-0053, DBLLTF item 3.2.1.2	Closed, see Attachment 2
Ensure that licensee procedures provide adequate guidance for the identification of reactor coolant pressure boundary leakage	SECY-04-0053, DBLLTF item 3.2.1.3	Closed, see Attachment 2
Develop inspection guidance to ensure the adequacy of PWR plant boric acid corrosion control programs	SECY-04-0053, DBLLTF item 3.2.2.1	In progress, see Attachment 2
Develop inspection guidance for the verification of the implementation of owners groups' commitments	SECY-04-0053, DBLLTF item 3.2.3.2	Closed, see Attachment 2
Develop inspection guidance to assess repetitive or multiple technical specification action statement entries	SECY-04-0053, DBLLTF item 3.3.1.2	Closed, see Attachment 2

Issue	Reference	Status
Evaluate inspection guidance pertaining to refueling outage activities	SECY-04-0053, DBLLTF item 3.3.4.1	Closed, see Attachment 2
Strengthen inspection guidance for reviewing operating experience	SECY-04-0053, DBLLTF item 3.3.4.2	Closed, see Attachment 2
Provide more structured and focused inspections to assess licensee employee concerns programs and safety-conscious work environment	SECY-04-0053, DBLLTF item 3.3.4.5	Superceded/ Closed, see Attachment 2
Reassess the basis for the cancellation of the inspection procedures that were deleted by Change Notice 01-017	SECY-04-0053, DBLLTF item 3.3.4.7	Closed in early 2005, see Attachment 2
Establish program expectations and metrics to satisfy minimum resident inspector staffing levels	SECY-04-0053, DBLLTF item 3.3.5.3	Closed, see Attachment 9
Ensure the adequacy of site staffing and modify policy as necessary	SECY-04-0053	Closed, see Attachment 9
Communicate proposed revisions to engineering design inspections in a separate Commission paper	SECY-04-0053	Closed, pilot ongoing, see Attachment 2
Conduct pilot program to ascertain feasibility of the licensee self-assessment process	SECY-04-0053	On hold, see Attachment 2
Revise inspection guidance and lift moratorium on associated circuit inspections	SECY-04-0053	Closed, see Attachment 2
Develop inspection procedures on how to inspect for boric acid corrosion and stress corrosion cracking, and train inspectors before issuing the procedures	SECY-04-0053	Closed, see Attachment 2
Report the results of the pilot inspection program used to evaluate the effectiveness of the baseline inspection procedure consolidation effort	SECY-04-0053	In progress, see Attachment 8
Reconsider personnel staffing policies and continue aggressive hiring strategies by all four regions to avoid staffing shortfalls	SECY-04-0053	Closed, see Attachment 8
Perform a program review to understand the reasons for regional differences in expenditure rates and identify best practices for conducting inspections	SECY-04-0053	In progress, see Attachment 8
Continue to monitor RI demographics and report to the Commission	SECY-04-0053, SRM dated 04/08/98	Ongoing, see Attachment 9

Issue	Reference	Status
Streamline and automate the data collection process for the inspector “quality-of-life” metrics and incorporate them in the IMC 0307 process	SECY-04-0053	Closed, see Attachment 9
Enhance the ROP treatment of cross-cutting issues to more fully address safety culture	SRM dated 08/23/04	Ongoing, see Attachment 2
Evaluate the effectiveness of the significant revisions to the problem identification and resolution (PI&R) and fire protection inspection procedures (IPs) and adjustments to several other IPs regarding procedure scope, frequency, and level of effort. Continue to improve major program guidance (IMCs, IPs) as a result of stakeholder feedback and lessons learned	NRR commitment in its management control plan (ref. ML043370410)	In progress, see Attachment 2
Monitor the impact and effectiveness of actions taken in FY 2004 to increase the availability of fully qualified inspectors (i.e., the increased regional budget for operating reactor inspection activities and the revised resident inspector policy to allow early assignment of new resident and senior resident inspectors to a site)	NRR commitment in its management control plan (ref. ML043370410)	Closed, see Attachments 2 and 8
Perform an evaluation of the efficiency of the agency’s baseline inspection program	FY 2004–2009 Strategic Plan, Appendix B, and NRR’s management control plan (ref. ML043370410)	Closed, see Attachment 2
Significance Determination Process		
Validate and issue plant-specific risk-informed inspection notebooks, including the Phase 2 worksheets	SECY-04-0053	In progress, see Attachment 3
Continue efforts to obtain improved and standardized risk analysis tools for the risk analysts	SECY-04-0053	Ongoing, see Attachment 3
Develop an SDP for plant shutdown issues	SECY-04-0053	Closed, see Attachment 3
Develop an SDP for steam generator tube integrity	SECY-04-0053	Closed, see Attachment 3
Develop SDPs for maintenance and spent fuel	SECY-04-0053	In progress, see Attachment 3

Issue	Reference	Status
Improve the capability to assess the impact of external events on operating reactor safety-related issues	SECY-04-0053	Under consideration, see Attachment 3
Assess the impact of the policy change for preliminary categorization of findings as “potentially greater than green”	SECY-04-0053	In progress, see Attachment 3
Continue to monitor and make planned SDP improvements via the SDP Improvement Plan	SECY-04-0053, Director’s Quarterly Status Report	In progress, see Attachment 3
Provide up-to-date information to the Commission on the timeliness of SDP evaluations.	SRM dated 12/23/04	Closed, see Attachment 3
Perform an evaluation of the effectiveness of the recent changes made to improve the timeliness of the fire protection SDP	SRM dated 12/23/04	In progress, see Attachment 3
Perform an evaluation of the effectiveness of the significance determination process	FY 2004–2009 Strategic Plan, Appendix B, and NRR’s management control plan (ref. ML043370410)	Closed, see Attachment 3
Assessment Program		
Provide a more predictable standard or criterion for determining what constitutes a substantive cross-cutting issue	SECY-04-0053	Closed, see Attachment 4
Monitor the effectiveness of the guidance for removing plants from the multiple/repetitive degraded cornerstone column of the Action Matrix	SECY-04-0053	Closed, see Attachment 4
Identify alternative mechanisms to independently assess plant performance	SECY-04-0053, DBLLTF item 3.3.3.1	Closed, see Attachment 4
Perform a sample review of the plant assessments conducted under the interim PPR assessment process	SECY-04-0053, DBLLTF item 3.3.3.2	Closed, see Attachment 4
Continue to assess combination of inputs and length of time for consideration in the Action Matrix to ensure appropriate agency response	SECY-04-0053	Ongoing, see Attachment 4

Issue	Reference	Status
Continue to analyze cross-cutting issues	SECY-04-0053	Ongoing, see Attachment 4
Monitor effectiveness of IMC 0305 and IMC 0350 changes	SECY-04-0053	Closed, see Attachment 4
Perform a cross-cutting issue assessment	SECY-04-0053	Closed, see Attachment 4
The staff should continue efforts to better define thresholds for identifying and responding to substantive cross-cutting issues	SRM dated 05/27/04	Closed, see Attachment 4
When deviations from the action matrix occur, the staff should evaluate the causes for the deviations and identify changes to the ROP, as appropriate, that may obviate the need for deviations in the future	SRM dated 05/27/04	Closed, see Attachment 4
The staff should inform the Commission when deviations from the action matrix are granted and highlight plants for which such deviations are granted at the annual AARM Commission meeting	SRM dated 05/27/04	Closed, see Attachment 4
As part of the normal self-assessment process, the staff should improve the standardization and transparency of the process for plants to exit from increased oversight columns in the action matrix	SRM dated 05/27/04	Closed, see Attachment 4
The staff should standardize the process for requesting and documenting deviations from the action matrix	SRM dated 05/27/04	Closed, see Attachment 4
Communication Activities and Other Program Issues		
Conduct an independent survey by a qualified contractor of the impact of the NRC's activities on reactor licensees' operations	SECY-04-0053, SRM dated 01/30/02	Closed, see Attachment 7
Report regulatory impact results in the next annual ROP self-assessment Commission paper, rather than by separate correspondence	SECY-04-0053	Closed, see Attachment 7
Evaluate the need and feasibility for a public workshop	SECY-04-0053	Closed, see main body

Issue	Reference	Status
Provide ROP refresher training to managers and staff members	SECY-04-0053, DBLLTF item 3.3.4.6	Closed, see main body
Continue to make enhancements to the ROP feedback process	SECY-04-0053	In progress, see main body
Develop an electronic support system for inspectors to help inspectors perform their jobs more efficiently	SECY-04-0053	In progress, see main body
Continue to explore IT technologies to gain inspector efficiencies	SECY-04-0053	In progress, see main body
Conduct the next internal survey in the fall of 2004	SECY-04-0053	Closed, see Attachment 6
Perform a program evaluation of the ROP in FY 2005 as delineated in Appendix B to the FY 2004–2009 Strategic Plan	FY 2004–2009 Strategic Plan, Appendix B, and NRR’s management control plan (ref. ML043370410)	Closed, see main body
Perform a complete evaluation of the performance measures in both the ROP self-assessment program and the NRR operating plan and revise them as necessary to support the new Safety Performance Measures	NUREG-1100, Volume 21, dated February 2005 (e.g., the Green Book)	Closed, see main body