

Lack of Clarity

- A. "Causal Factor"
- B. "Common Theme"

Example: CAP (Component)

"Licensee implement a corrective action program with a low threshold for identifying issues. The licensee identifies such issues completely, accurately and in a timely manner commensurate with their safety significance."

How many themes:

#1

- Low threshold
- Completely, accurately, and in timely manner commensurate with their safety significance

#2

- Low threshold
- Completely
- Accurately
- Timely
- Commensurate with safety significance

#3

"For example" – are there more that aren't listed?

Example: Work Practice (Component)

"licensee defines and effectively communicates the necessity of procedural compliance and personnel follow procedures"

Themes:

#1 Failure to Follow Procedure

#2 Why Failure to Follow Procedure

- Unclear picture
- Random isolated
- Deliberate
- Skill of Craft

cross-cutting areas. In order to support the evaluation of findings with cross-cutting aspects, the inspectors should provide sufficient detail in the PIM and provide periodic updates as new information becomes available in accordance with IMC 0306 and IMC 0612.

- 2) During preparation for the mid-cycle and end-of-cycle review meetings, each finding is evaluated against the cross-cutting area components (as listed in section 06.07.c). There should usually be only one principal cause and one cross-cutting area component associated with each finding. However, it may be appropriate for some inspection findings with multiple root causes to be associated with more than one cross-cutting area component.
- 3) Once all findings are evaluated against the cross-cutting area components, the findings in each component should be examined to determine if any commonality exists which may be indicative of a substantive cross-cutting issue. Components within the cross-cutting areas are provided as a tool to assist in determining whether a common cause exists within the identified findings with cross-cutting aspects.

b. Criteria For a Substantive Cross-Cutting Issue

A substantive cross-cutting issue in the problem identification and resolution or human performance cross-cutting areas would exist if all of the following three criteria are met:

1. There are more than 3 green or safety significant inspection findings in the PIM for the current 12-month assessment period with documented cross-cutting aspects in the areas of human performance or problem identification and resolution. Observations or violations that are not findings should not be considered in this determination.
2. The causal factors have a common theme. A substantive cross-cutting issue should be corroborated by the existence of a significant number (more than three (3)) of findings. The findings should share a common performance characteristic more specific than the cross-cutting area components and should be from more than one cornerstone. However, it is recognized that given the significant inspection effort applied to the mitigating systems cornerstone, a substantive cross-cutting issue may be observed through inspection findings associated with only this one cornerstone.

The cross-cutting area component descriptions listed in 06.07.c should be used to determine whether the cross-cutting aspects have a common theme. Examples would be when there are numerous instances of green findings in areas such as personnel failures to follow procedures (human performance: work practices), ineffective evaluation of performance deficiencies (problem identification and resolution: corrective action program), or inadequate system engineering support of operability determinations (human performance: resources).