



RIC 2006

Session Th5E

ROP/Inspection Program

ROP Realignment/Performance Deficiencies

Russell A. Gibbs, Chief
Reactor Inspection Branch
Division of Inspection & Regional Support
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ROP Realignment

- Reviewed Three Years of Inspection Findings
- HQ and Regional Staff Applied the Following Key Attributes:
 - # findings per 1000 inspection hours
 - “core business” of regulatory oversight role
 - field time versus in-office review

ROP Realignment

- Result - Redistribution of 80 Inspection Hours
 - Deleted Operator Workaround IP and folded into PI&R
 - Increased hours in operability evaluations, PI&R, operator requalification
 - Reduced hours for temp mod, surveillance testing, maintenance effectiveness

- Key point – we will continue to assess the ROP for its effectiveness

Performance Deficiency

- Basis for inspection findings is explicitly grounded in deficient licensee performance
 - Deficiencies may involve regulatory requirements, standards and good operating practices
- If no performance deficiency identified when a degraded condition occurs, it is considered part of baseline risk of the facility
 - Such cases should prompt adequacy of regulatory infrastructure
- Defined in IMC 0612, “Inspection Reports”

Performance Deficiency

- An issue that is the result of a licensee not meeting a requirement or standard where the cause was reasonably within the licensee's ability to foresee and correct and should have been prevented.
 - **The licensee does not have to be committed to a standard in order to determine whether there is a performance deficiency (PD). For example, a PD is determined to exist if the licensee fails to adhere to a widely accepted industry standard.**
- Question – should these widely accepted industry standards be self-imposed?

Performance Deficiency

- Moving forward...
 - Engage further with stakeholders to determine if current definition needs to be revised
 - Examine the role of the NRC for situations that do not involve regulations but are the “right thing to do” to ensure protection of public health and safety