MANUAL CHAPTER 0801

REACTOR OVERSIGHT PROCESS FEEDBACK PROGRAM

0801-01   PURPOSE

This chapter describes in detail the feedback process and feedback form used by the Office of Nuclear Reactor Regulation (NRR), Division of Inspection and Regional Support (DIRS), to document problems, concerns, or difficulties encountered in implementing the programs of the NRC's Reactor Oversight Process (ROP).

0801-02   POLICY

The NRC encourages the staff to identify issues that need program level attention and to suggest changes to improve the effectiveness or implementation of the ROP. Although feedback is expected to come mostly from staff who implement the agency's oversight programs, any NRC employee may use the processes described below to make suggestions or recommendations regarding the ROP.

An initial response to acknowledge the feedback received by the Reactor Inspection Branch (IRIB) will be issued within 15 working days of receipt. DIRS has an established |
goal to resolve feedback forms with a high priority immediately, a medium priority within 90 days, and low priority feedback forms within 180 days. A feedback issue normally will be closed when it has been resolved or moved into another program to be resolved (for |
complex issues), and the originator has been notified of that action. ROP documents |
affected by resolved feedback forms will be updated at least yearly. |

0801-03   APPLICABILITY

All NRC employees who have concerns or wish to provide feedback regarding the performance indicator, assessment, inspection, significant determination process, enforcement, and training programs should follow the procedures outlined in section |
05.01a of this inspection manual chapter. |

The process described herein is used to collect and manage feedback on all ROP programs, including the Performance Indicator Program. The method for resolving interpretations of performance indicators is described in Inspection Manual Chapter (IMC) 0608, "Performance Indicator Program."

0801-04   RESPONSIBILITIES

04.01   Director, Division of Inspection and Regional Support (DIRS). Oversees the feedback program for the ROP.

04.02   Chief, Reactor Inspection Branch (IRIB), NRR. Administers the feedback program for the Reactor Oversight Process. Ensures the final resolution of ROP feedback is approved by the cognizant technical branch chief or designated official. Approves inspector training, as appropriate.

04.03   Chiefs, Technical Branches, NRR. Ensures that feedback on their programs is reviewed and that a response is sent to IRIB within the assigned priority (refer to Section 05.01 b.1.(b) below) of the feedback, if possible. Supervises the resolution of feedback on elements of the ROP within their branch's scope of responsibilities. Performs final review on closure for all feedback. Recommends inspector training, as appropriate.

| 04.04   Regional Offices. Regional managers review feedback submitted by their staff and responds to issues and questions within their capabilities within 10 working days. Forwards ROP feedback forms with response, or comments and suggested | recommendations to the ROP Feedback Coordinator via email (PIPBCAL). Regional | Feedback Coordinators receive resolved forms from the ROP Feedback Coordinator and | distributes the forms to the unique internal stakeholders within the region's organization to | keep them informed of relevant program changes.

| 04.05   ROP Feedback Coordinator. Receives feedback forms in parallel with the regional | office, processes forms through the NRR Work Planning Center, assigns a lead reviewer, | ensures management review, and maintains the ROP feedback database. Notifies the | originator, originator's supervisor, and the Regional Feedback Coordinator at the receipt | and the resolution of feedback forms.

| 04.06   Lead Reviewer.   Is typically the lead individual for the program document | referenced on the form. Will review and resolve feedback forms within the time allotted per the assigned priority, coordinate changes to program guidance document, and ensures the | final resolution of feedback is consistent with overall program guidance and the ROP framework. Recommends inspector training, as appropriate.

0801-05   DISCUSSION

NRC staff implementing NRC's programs (particularly inspectors) have first-hand information on licensee performance and directly observes the impact and results of NRC programs and regulatory requirements. Therefore, it is important that the staff are given | an opportunity to submit questions, concerns, and suggestions through their regional or | headquarter's supervision to the program offices.

Program offices need written feedback that explains the originator's suggestions or concerns to make effective changes to the ROP programs. Staff feedback must be | documented on an ROP Feedback Form (Exhibit 1) by the originator, and electronically | submitted concurrently to their regional supervision and to IRIB, via PIPBCAL. The regional manager should review the originator's feedback, comment on or respond to the

feedback by providing a potential resolution to the issue, and notify both the originator and | IRIB via PIPBCAL. |

The ROP Feedback Coordinator coordinates the review of feedback to the ROP through | the NRR Work Planning Center. The ROP Feedback Coordinator, within 15 days, | processes the feedback using the NRR Work Planning and Characterization Form, | assigns a lead reviewer to resolve the concern from the program or technical branch | responsible for the procedure or area. The time assigned to complete the review is based | on the assigned priority (High - perform immediately, Medium - <90 days, Low - <180 | days). After the feedback form is processed, the ROP Feedback Coordinator then | electronically forwards it to the originator, originator's supervisor, the regional feedback | coordinator, and lead reviewer. |

The lead reviewer should contact the originator to discuss the feedback issue, then | resolves the issue within the time assigned. The lead reviewer, at a minimum, will | determine how the staff should address the issue if accepted, or provide an explanation | why the recommendation was not accepted. The reviewer then submits the resolved | feedback form to their Branch Manger for approval. Once approved, the lead reviewer | forwards the ROP Feedback Coordinator an electronic copy of the signed feedback | resolution which is then updated in the database as either closed or closed - pending | change notice. The ROP Feedback Coordinator will electronically forward the resolved | feedback form to it's originator, originator's supervisor, all regional coordinators, and lead | reviewer. All Regional Feedback Coordinators receive resolved forms in order to | distributes the forms to the unique internal stakeholders within the region's organization to | keep them informed of relevant program changes. |

The resolved ROP feedback form that has a document change pending is tracked | electronically by the ROP Feedback Coordinator until it is incorporated into the program | document. The program document is updated on a periodic bases or at least annually. | Once the inspection procedure or manual chapter is issued, the ROP Feedback | Coordinator removes the feedback form from all tracking programs. IMC 0608 describes | the process for resolving performance indicator issues that are documented on ROP | feedback forms in accordance with this manual chapter. |

05.01   Reactor Oversight Process Feedback

a.   Documenting ROP Feedback

NRC employees who desire to provide feedback regarding the ROP (i.e., inspection, assessment, enforcement, performance indicators, significance determination process, training, and cross-cutting issues) record their comments and recommendations on the ROP Feedback Form (Exhibit 1). Although the following is written from the perspective of a regional office, the guidance applies to any NRC organization that receives ROP feedback forms from its staff.

1.   The originator documents information on the ROP Feedback Form (Exhibit 1) as follows:

(a) Section A, Title: Record the Inspection Procedure (IP) or IMC title, or the name of the performance indicator (PI). Fill in the IP or IMC number and issue date, or the PI flag (i.e. MS01), if known. If an issue affects more than one program document (e.g., IMC 0609, "Significance Determination Process," and IMC 0612, "Reactor Inspection Reports"), the program documents should be indicated on the ROP feedback form.

(b) Section B, Topic: Select all topic areas to which the feedback issue applies.

(c) Section C, Summary of Issue: Briefly summarize the concern or issue in one or two sentences (e.g., "IMC0612 provides conflicting and incomplete guidance on documentation of minor violations"). Originators submitting feedback forms should address no more than one issue per form. Identify the specific IP or IMC section to which the feedback issue applies.

(d) Section D, Comment(s)/ Recommendation(s): Briefly describe the concern or issue and the impact to the IP or IMC and other related program documents (if known). If the description includes an excerpt from another document as an attachment to the feedback, attach only the portion of an inspection report or the program document that pertains to the concern or issue. Provide recommendation(s) and suggested resolution(s) for the issue. Include in the recommendation if staff resources to implement the recommended change will be impacted and how. Lastly, indicate in the boxes provided the importance of the issue by marking the appropriate priority for resolution and whether training should be part of the solution.

If describing a PI interpretation issue: 1) state the licensee's interpretation, 2) state the region's position, and 3) provide any recommendation(s), if appropriate.

(e) Section E, Originator: Complete all of the applicable information in this section.

(f) Email the completed feedback form to the appropriate supervisor (or designated regional contact) with a copy (cc) to PIPBCAL.

(g) After the originator receives the processed feedback form from the ROP feedback coordinator, he or she should periodically contact the lead reviewer to discuss the issue to assist in a timely resolution of the form.

2. Supervisor's Review (Section F): The originator's management (usually a supervisor) reviews the feedback form, responds to issues and questions within their capabilities, provides perspective on originator's feedback, provides potential resolutions to the issue to IRIB, electronically signs

feedback form, and e-mails the form to both the originator and PIPBCAL within 10 working days.

Information received by the program office through other means (e-mails, agency reports, and in some cases from external stakeholders, etc.) that could affect the ROP is reviewed by an IRIB supervisor and documented on an ROP feedback form if further consideration is necessary.

b. <u>Headquarters Review of ROP Feedback</u> |

The Reactor Inspection Branch coordinates the review of feedback on all aspects |
of the ROP using the NRR Work Planning Center and the Work Planning and |
Characterization Form. |

1. The ROP Feedback Coordinator performs the following: |

(a) Section G, Lead Reviewer Assigned: The ROP Feedback Coordinator |
receives feedback form concurrently with originator's supervisor,
processes it within 15 working days using the NRR Work Planning and |
Characterization Form from the NRR Work Planning Center. The |
Work Planning Center assigns the feedback form a TAC number. |
Electronically forwards copy of the processed feedback form to the
originator, originator's supervisor, regional feedback coordinator, and |
lead reviewer.

(b) Assigns the priority for response (High - perform immediately, Medium
- <90 days, Low - <180 days, after consulting with the lead reviewer).

(c) Maintains the ROP feedback data base.

(d) Regularly provides status reports to management and staff.

(e) Posts status reports to ROP web-page.
(http://nrr10.nrc.gov/rop-digital-city/feedback.html) |

(f) Section I, Headquarters Approval and Completion Tracking: The ROP |
Feedback Coordinator receives from lead reviewer, an electronic copy |
of the final approved feedback resolution. Updates in the database |
the resolution of the issue and whether the form is closed with no |
further action or involves a change to the program guidance document. |
The feedback form requiring a document change will continue to be |
tracked electronically. |

(g) Completes tracking table in Section I. Electronically forwards updates
and resolved feedback forms to originator, originator's supervisor,
assigned regional feedback coordinators in each region, and lead |
reviewer.

2. The lead reviewer completes Section H, Lead Reviewer's Remarks and Resolution, within the time allotted for the assigned priority and performs the following:

    (a) Directly contacts the originator, as needed, to fully understand the feedback.

    (b) Determine whether to accept or not to accept the feedback recommendation. At a minimum, the response should describe how the staff intends to address the issue if accepted, or provide an explanation why the recommendation was not accepted. The final response is recorded on the electronic copy of the feedback form.

    (c) Follows the process in IMC 0608, "Performance Indicator Program," for resolving performance indicator interpretation issues.

    (d) Forwards the response to his or her Branch Chief for final approval. After the feedback resolution is approved by the Branch Chief, the ROP Feedback Coordinator will forward the resolved feedback form to the originator and the originator's organization.

    (e) At least on an annual basis, the lead reviewer will incorporate the approved program document or procedure changes as per the guidance of Manual Chapter 0040, Preparing, Revising, and Issuing Documents for the NRC Inspection Manual.

    (f) Informs ROP Feedback Coordinator of the status of the feedback form by recording actions and decisions on the form.

d. <u>Closing ROP Feedback Forms</u>. IRIB closes a ROP feedback form after receiving the completed Work Planning and Characterization Form from the NRR Work Planning Center. The ROP Feedback Coordinator continues to electronically track feedback issues where a revision to an inspection procedure or manual chapter is to be documented. The reviewer will mark the block entitled "Hold for Issuance of Change Notice" in Section H. The feedback form will continue to be tracked in the table in Section I, until the Change Notice for the inspection procedure or manual chapter is issued. Once the inspection procedure or manual chapter is issued, the ROP Feedback Coordinator will close the feedback form. If the resolution of the feedback does not affect a program document, the issue is closed when the approved final response is sent to the originator and the originator's management. IMC 0608 describes the process for resolving performance indicator issues that are documented on ROP feedback forms in accordance with this manual chapter.

END

REACTOR OVERSIGHT PROCESS FEEDBACK FORM

Feedback Form No.

(provided by IRIB)

INSTRUCTIONS
(1) Originator: Complete Sections A through E and email completed feedback form to your supervisor (or designated regional contact) with a copy (cc) to PIPBCAL.
(2) Supervisor (or regional contact): Complete Section F of this form, then email form to the originator and to PIPBCAL.

SECTION A: TITLE
(Record the Inspection Procedure (IP) or IMC title, or the name of the performance indicator (PI). Fill in the IP or IMC number, or the PI flag (i.e. MS01), if known. If an issue affects more than one program document (e.g., IMC 0609, "Significance Determination Process," and IMC 0612, "Reactor Inspection Reports"), the program documents should be indicated on the ROP feedback form).

Inspection Procedure (IP) or Inspection Manual Chapter (IMC) Title or Performance Indicator (PI) Title:	
Inspection Procedure (IP) or Inspection Manual Chapter (IMC) Number and the issue date:	
Performance Indicator Flag (i.e. MS01):	

SECTION B: TOPIC (Select all topic area to which the feedback issue applies):

Inspection ☐   SDP ☐   PIs ☐   Training ☐

Assessment ☐   Enforcement ☐   Other ☐   X-Cut Issue ☐

SECTION C: SUMMARY OF ISSUE
(Briefly summarize the concern or issue in one or two sentences (e.g., "IMC0612 provides conflicting and incomplete guidance on documentation of minor violations"). Originators submitting feedback forms should address no more than one issue per form. Identify the specific IP or IMC section to which the feedback issue applies).

IP/IMC Section:

Summary:

SECTION D: COMMENT(S)/RECOMMENDATION(S)

(Briefly describe the concern or issue and the impact to the IP or IMC and other related program documents (if known). If the description includes an excerpt from another document as an attachment to the feedback, attach only the portion of an inspection report or the program document that pertains to your concern or issue. Provide recommendation(s) and suggested resolution(s) for the issue. Include in the recommendation if resources to implement the change will be impacted and how. Lastly, indicate in the boxes provided whether training would be part of the solution. If describing a PI interpretation issue: 1) state the licensee's interpretation, 2) state the region's position, and 3) provide any recommendation(s), if appropriate).

Comment(s):

Recommendation(s):

High	Med	Low

Requested Priority (High - Immediately, Med - <90 days, Low - <180 days)

YES	NO

Do you think training is part of the solution?

SECTION E: ORIGINATOR

(Complete all of the applicable information in this section. Providing the name and email address of your supervisor will improve reviewer followup communication).

Name:	
E-mail:	
Phone No:	
Plant Name or Region:	
Date submitted to Supervisor:	
Supervisor's Name:	
Supervisor's E-mail:	

SECTION F: SUPERVISOR'S REVIEW

(The originator's management (usually a supervisor) reviews the feedback form, responds to issues and questions within their capabilities, provides perspective on originator's feedback, suggests recommendations to IRIB, electronically signs feedback form, and e-mails the form to both the originator and PIPBCAL within 10 working days).

Supervisor's remarks (mandatory):

Supervisor: _____   Date: _____

SECTION G: LEAD REVIEWER ASSIGNED

(The ROP Feedback Coordinator assigns the feedback form to a Lead Reviewer. The Lead Reviewer responds to the feedback within the time allotted by the assigned priority and determines to accept or not to accept the feedback recommendation. After the feedback resolution is approved by the reviewer's Branch Chief, the comments are incorporated into the program document).

Assigned to: [   ] Branch: [   ] Phone No: [   ]
          (Lead Reviewer)

Date Lead Reviewer Received Feedback Form: [   ]

Date Feedback Coordinator Acknowledged Receipt to Originator: [   ]

Priority (High - Immediate; Medium - <90 Days; Low - <180 days) [   ]

TAC Number: [   ]

LEAD REVIEWER'S RESPONSE:

CHANGE NOTICE/TRAINING RECOMMENDATIONS:	YES	NO
Change Notice Recommended (Please note that any proposed change must still undergo the normal regional review and comment prior to implementation and that the proposed language may change as a result):		
Training Recommended:		

SECTION I: HEADQUARTERS APPROVAL AND COMPLETION TRACKING

(The HQ Branch Chief approves the final resolution of feedback comments and the originator and the originator's organization are notified. The ROP feedback form is closed if the resolution does not affect the program document, or <u>after</u> the comments or suggestions are incorporated into a program document. The feedback form will remain open, and tracked in the table until the Change Notice for the inspection procedure or manual chapter is issued).

Lead Reviewer: _____   Date: _____

Final Branch Approval: _____   Date: _____
          (HQ Branch Chief)

Date Feedback Form w/ Change Notice Updated in Database: [   ]

Date Feedback Coordinator Updated Originator of Feedback Status: [   ]

Date Revised Document Issued: [   ]

Date Feedback Form Closed in Database: [   ]

END

ATTACHMENT 1
Revision History - MC0801

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	02/15/06	Revision history reviewed for the last four years	NO	N/A	N/A
N/A	03/05/02 CN 02-007	Revised to reflect significant changes in the agency's oversight process and associated programs that have occurred since its last issuance on 01/01/83. This revision captures the feedback process associated with implementing the Reactor Oversight Process. It also describes in detail the feedback process and the role of those individuals with responsibility for reviewing and closing out feedback issues. This IMC includes an attachment that will be used to document feedback concerns.	NO	N/A	N/A
N/A	01/27/05 CN 05-004	Revised so IIPB receives copies of all Feedback Forms concurrently with regional management via PIPBCAL. The feedback form (Exhibit 1) was revised to reflect this change and enhance the documentation and submission of issues and concerns. Enhancements were also made to improve the tracking of the resolved feedback forms until the revised document is issued.	NO	N/A	N/A
NA	03/13/06 CN 06-006	Revision updates position titles as per the NRR reorganization and incorporates assigning a high, medium, or low priority to the Feedback issue. Completion of priority are to be as follows: A high priority will be completed immediately, a medium priority will be completed within 90 days, and low priority within 180 days.	NO	N/A	N/A
NA	10/19/06 CN 06-028	Revision introduces use of the NRR Work Planning Center to assign TAC number and assign task to reviewer using the Work Planning and Characterization Form.	NO	N/A	N/A