APPENDIX B

ROP REALIGNMENT PROCESS

1. PURPOSE

To describe how the Reactor Inspection Branch (IRIB) will conduct its periodic review to ensure most effective overall application of inspection resources.

2. BACKGROUND

The Reactor Oversight Process (ROP) annual self-assessment evaluates the overall success of the ROP in meeting the agency's performance goals. Performance metrics associated with these goals verify the effectiveness of the ROP and are described in detail in Appendix A of the Inspection Manual Chapter 0307, "Reactor Oversight Process Self-Assessment Program." In addition to the ROP self-assessment, IRIB and regional staff will conduct a periodic (at least biennially) effectiveness review of the inspection element of the ROP by using various program evaluations and performance metrics to determine if the inspection program is meeting the goals and intended outcomes. Analysis with recommended changes to inspection procedures (IPs), if any, will be forwarded to the Regional Division Directors for comment and to the Deputy Director of Division of Inspection and Regional Support (DIRS), NRR. Change(s) to any inspection procedures which result from this review effort can only be made if the majority of the regions (three out of the four) concur with the recommended changes.

3. IMPLEMENTATION

a. <u>Review Team:</u>

The review team will consist of the following:

- Review team leader from DIRS (team leader will be selected from IRIB or Performance Assessment Branch (IPAB))
- Inspection Procedure Owners (IRIB, IPAB and Regions)
- Regional Division Directors or Regional Representatives

b. <u>Review Team Leader Responsibilities:</u>

i. Develops a review schedule and coordinates the review meetings.
ii. Works with DIRS management and Regional Division Directors to revise, if needed, the review criteria to be used for evaluating the inspection procedures.
iii. Obtains concurrence from the Regions and DIRS, NRR on the review criteria to be used for the IP evaluation.

iv. Ensures that inspection procedures are evaluated in accordance with the review criteria.
v. Collects evaluation results for each inspection procedure from DIRS and regional inspection procedure leads.
vi. Conducts the review meetings with DIRS and regional IP leads and representatives to discuss the evaluation results and recommended changes to IPs, if any.
vii. Provides summary of evaluation results and recommended changes to IPs, if any, for concurrence by DIRS management and Region Division Directors.
viii. Provides evaluation results to the annual ROP Self-Assessment Paper. For example, CY 2006 evaluation results will be provided as an input to the ROP Self-Assessment Paper issued in CY 2007.
xi. Ensure training for any changes are approved by the IMC-1245 management steering committee and the approved training is implemented before revised IPs are issued.
x. Ensure that the approved changes are made to the affected procedures (IPs and IMCs) before beginning of the next calendar year.

c. Inspection Procedure Owners (IRIB, IPAB and Regions) Responsibilities:

i. Perform IP evaluations and propose any recommended changes (add/delete inspection requirements; increase/decrease inspection sample requirements; add or delete inspection procedure; or no change recommended) and the basis for recommending the change(s). The basis should contain the criteria (e.g., to increase the number of findings being identified in the inspected area, based on inspector feedback and other appropriate review criteria) used for making a recommendation to revise the IP.
ii. Act as a lead during the review meeting with the regional representatives to discuss the results of their IP review and recommendations for change to the inspection procedure.
iii. Revise and issue the inspection procedure, if required.
iv. Identify and recommend training requirements for any changes made to their IPs to the review team leader.

d. Regional Division Directors or Regional Representatives:

i. Regional Division Directors will appoint, if necessary, an IP lead to work with DIRS staff to perform an evaluation of each IPs using the selected criteria identified in the attachment to this appendix.
ii. DRP and DRS Division Directors or their assigned representatives shall attend the annual ROP realignment review meeting coordinated by DIRS staff. If a representative is sent to the meeting, he/she will be able to represent the region's viewpoint and will be given the authority to vote in absence of the Division Director.
iii. The regional Division Directors or representatives will either recommend that regions concur, modify or reject the recommended changes to each inspection procedure.

e. Review Scope:

The outcome of this review is to improve the alignment of inspection resources across the inspection program to improve the inspectors' ability to identify risk significant licensee performance deficiencies. This should not result in a net increase of inspection resources to complete the baseline inspection program since addition of a new inspection requirement should be offset by a deletion of another requirement such that the overall budgeted ROP inspector resource requirement remains the same.

The IRIB/IPAB inspection procedure owner will review the past three years of inspection findings associated with his/her assigned inspection procedure and determine whether appropriate inspection resources are being applied based on the review criteria contained in the attachment to this appendix. The overall goal is to achieve the most effective application of inspection resources by directing inspectors to areas where there are potentially risk significant issues or where licensees are experiencing higher numbers of performance deficiencies.

The IP owners shall provide their analysis as described in the attachment to this appendix.

f. Review Process and Timeline:

DIRS management and regional Division Directors will approve the review criteria to be used by IP owners for their evaluation of IP effectiveness (March/April). The review criteria can be changed to reflect current inspector and industry performance issues/concerns and past evaluations. The ROP realignment team leader will revise the attachment to this appendix, as needed, to reflect the most recent review criteria and will send attachment to the IP reviewers. Changes to the review criteria shall be made using the ROP Feedback Program.

The ROP realignment process will begin in April after all inspection findings from the previous year's 4th quarter inspections have been entered in the Plant Issues Matrix (PIM). This will allow the IP owners to review all of the inspection findings that were identified during the last year's inspection effort. DIRS IP owners will work with regional IP owners or other point-of-contact to evaluate and provided recommend changes and the basis for the recommended change(s) to the IPs, if any.

The ROP realignment team leader will collect and send the IP evaluations to DIRS and Regional Division Directors in preparation for the annual ROP realignment meeting (May/June). The ROP realignment team leader will schedule the ROP realignment meeting (normally about two to three weeks after IP evaluations and recommendations for any change were sent to the regions). The purpose of the annual ROP realignment meeting (June/July) is to discuss the review performed by DIRS staff and regional IP owners with DIRS management and Regional Division Directors.

The team leader will facilitate the meeting to discuss proposed changes to the ROP with the Division Directors. The IRIB/IPAB and regional IP leads should attend the meeting to answer any questions which may be raised concerning their IPs. The regional IP leads should participate by using either the video conference system or by phone. At this meeting, the Regional Division Directors or their representatives will have an opportunity to ask questions on how the analysis performed, and can choose to concur, modify or reject the recommended changes to each inspection procedure.

After the annual realignment meeting, the ROP realignment team leader will forward the summary of changes agreed to during the ROP realignment meeting to the regional directors for formal concurrence (July/August). The regions will have a final opportunity to provide final corrections to the summary of the meeting minutes and concur on the proposed changes to the IPs (August/September). If majority of the regional division directors agree to the changes, the DIRS staff will make the changes to the IPs (September - December) and ensure that adequate training is provided to the inspectors (September - December) prior to implementation of the revised IPs in the following calendar year.

The purpose of the ROP realignment process is to appropriately allocate inspection resources within the inspection resource budget. The outcome of the review is to recommend and approve a realignment of inspection resources across the inspection program which would translate into addition or deletion of inspection requirements and increase or decrease in the number of samples. In situations where an inspection requirement or entire inspection procedure is deleted, considerations shall be given to provide, through other inspection means, a way to identify safety significant performance deficiencies which may occur in the future in the area no longer inspected. The resource evaluation required to complete the revised inspection program will be completed as part of an independent annual inspection resource analysis performed annually by IPAB.

Possible Inspection Procedure Review Criteria

- Proposed recommended improvements to those IPs which are at least one unit below the median ROP program value of inspection findings per 1000 hours.
- Increase the ability of inspectors to tour and inspect the plant by recommending changes to IPs which will require more in-field inspections.
- Develop a strategy to increase flexibility to implement the baseline program at a site based on inspector feedback and licensee's past inspection performance.
- Ensure that no inspection requirement which is intended to address past significant operating experience (NRC Bulletins and Generic Communications) is deleted from the baseline inspection program.
- Minimize reduction of inspection effort for IPs which represents a fundamental element of ROP.
- Develop strategies to increase inspection efficiency for IPs which inspect related inspectable areas.
- Consider addition of inspection requirement or providing additional inspection guidance for risk significant events identified through the Operating Experience process in the past three years.
- Consider reducing the inspection samples for selected inspection procedures to the minimum value during implementation of a new ROP program requirement (e.g., safety culture)

Format for Inspection Procedure Evaluation

1. IP number and title

2. Statement of Procedure Objective

3. Summary of past feedback received from the regions

4. Analysis and discussion of inspection findings per 1000 hour index

5. Discussion/analysis of review criteria using this attachment

6. Recommended changes (add/delete inspection requirements; increase/decrease inspection samples; add or delete inspection procedures or no change recommended)

Timeline for ROP Alignment Activities

Activity	Month	Participants
Approve ROP Realignment Review Criteria	March/April	DIRS management; regional Division Directors; review team Leader
Conduct Inspection Procedure Review	March/April	Review team leader; DIRS IP owners; Regional IP owners
Forward the results of the IP evaluations to DIRS and regional Division Directors	May/June	Review team leader
Conduct ROP realignment meeting	June/July	DIRS management and staff; Regional Division Directors and IP owners
Forward the results from the ROP alignment meeting to DIRS management and Regional Division Directors for concurrence	July/August	Review team leader
Regions concur on the proposed changes (frequency, samples, inspection requirements, inspection hours) to the inspection program	August/September	Regional Division Directors; DIRS management; Review team leader.
Revise inspection procedures (IPs) and issue IPs for use	September - December	DIRS management and staff
Conduct training on revised IPs, if required	October - December	DIRS management and staff

Revision History - IMC 0307 Appendix B

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	01/25/07 CN-07-003	Initial issuance of Appendix B to IMC 0307.	NO	N/A	ML 070120373