



Reactor Oversight Process

Cross-cutting Issues

(AKA Cross-cutting Aspects
AKA Safety Culture)

Region I RUG Meeting
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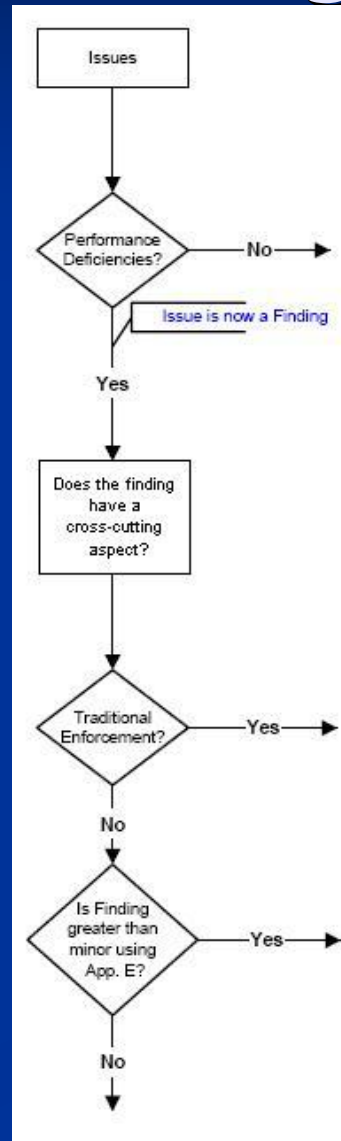
Background

- Inspection guidance documents and inspection procedures revised and implemented on July 1, 2006.
- Intent is to identify safety culture problems earlier.
- 18 month initial implementation phase, will evaluate lessons learned and revise ROP as needed.

How do you determine if a finding has a cross-cutting aspect?

- IMC 0612:
 - Finding (NRC identified or self-revealing issue of concern that is associated with a licensee performance deficiency...) is more than minor
 - Cross-cutting aspect was a significant contributor to the inspection finding
 - Cross-cutting aspect is reflective of current performance
 - Cause of the finding is related to a cross-cutting area (HP, PI&R, SCWE)

How do I determine if a finding has a cross-cutting aspect?



How do you determine which, if any, cross-cutting aspect applies?

■ IMC 0305:

- “Inspectors should identify the cross-cutting aspect using available causal information. The inspectors should identify the cause(s) that provides the most meaningful insight into the performance deficiency.”
- “Inspectors are not expected to perform independent causal evaluations beyond what would be appropriate for the risk significance of the issue”
- Inspectors use available information and their best judgment to determine applicability of cross-cutting aspects.
- As new information becomes available (licensee root cause evaluation), update cross-cutting aspects if warranted.

Suggested steps for you to identify cross-cutting aspect(s)

- Identify the primary cause of the inspection finding (Why did the finding occur?)
- Does the primary cause reflect performance in one of the cross-cutting areas? (HP, PI&R, SCWE)
- Is the primary cause reflective of current (within approximately 2 years) performance?
- Identify the cross-cutting aspect that best corresponds to the primary cause of the finding.

When should you be talking with licensees about cross-cutting aspects?

Onsite--Pre-Exit –Exit (Routine Discussions)

- During the Inspection
- Pre-Exit Meeting Discussions
- Exit Meeting Discussions

Region--Pre-Report

- Management Discussions
- Re-exit if Needed

Region/Onsite--Post-Report

- If report changes, re-exit and revise inspection report

How do you document a cross-cutting aspect?

- Description paragraph
 - Describe the performance deficiency that constitutes the basis for the finding
- Analysis paragraph
 - Document the reasons why the cross-cutting aspect is a significant contributor to the finding using parallel language to descriptions in IMC 0305
- 2nd paragraph of summary of finding
 - Highlight the cross-cutting aspect
- PIM
 - Same as summary of finding
 - Check block for cross-cutting area (0305 and RPS new numbering scheme for cross-cutting aspects)

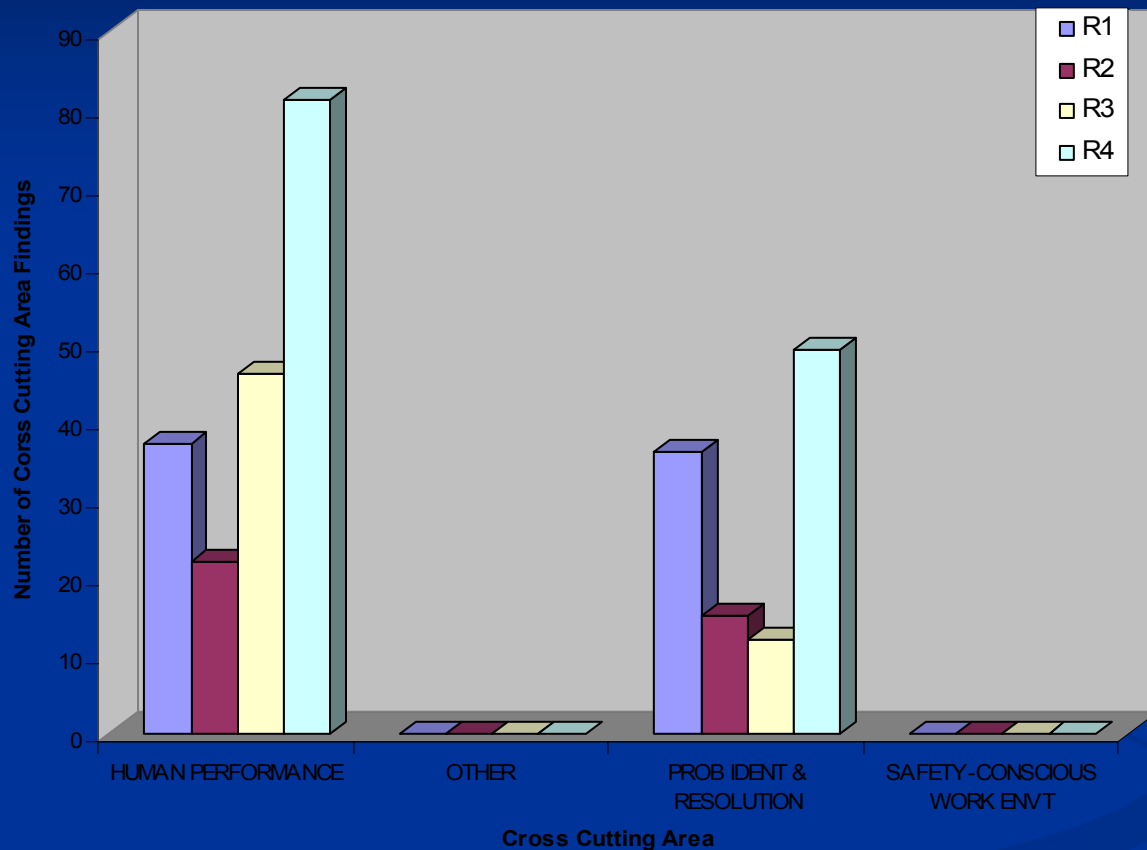
How do you handle findings with a potential SCWE cross-cutting aspect?

- When a potential SCWE cross-cutting aspect is identified during your inspection, contact your Branch Chief
- BC should contact Safety Culture Focus Team SCWE Finding Review Group (Lisa Jarriel or Ken O'Brien)
- Dialogue will occur during the inspection and during development of the inspection report.

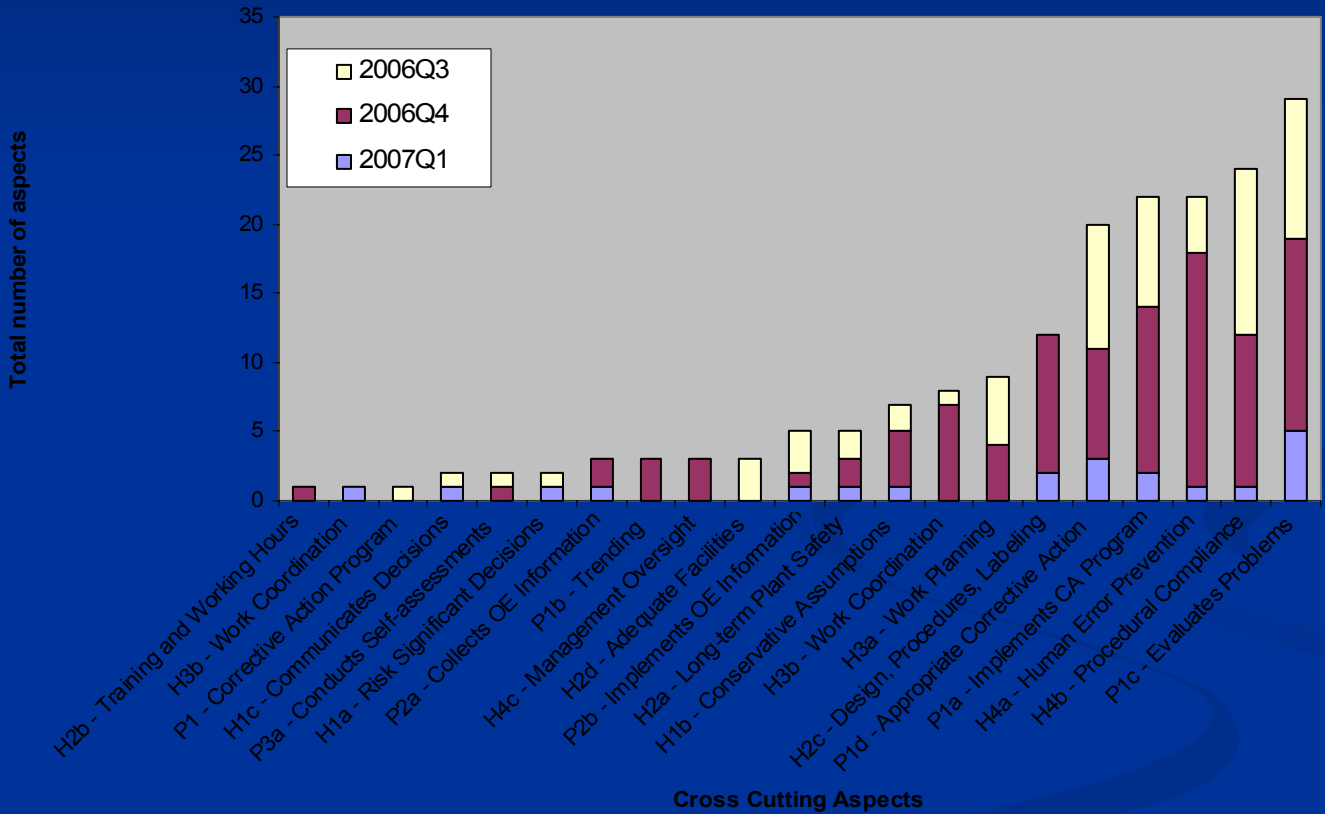
Recent Safety Culture Happenings

- IMC 0305 revised to uniquely identify cross-cutting aspects, related RPS change in progress to enter cross-cutting aspects
- Palo Verde IP 95003 effort has started, interactions with licensee on their safety culture assessment has begun
- IP 95003 safety culture assessors will come from NRR and Regions, pilot to establish 2 qualified SC assessors/region
- RIV led effort on cross-cutting aspects
- IMC 0612 Working Group audit of sample IRs

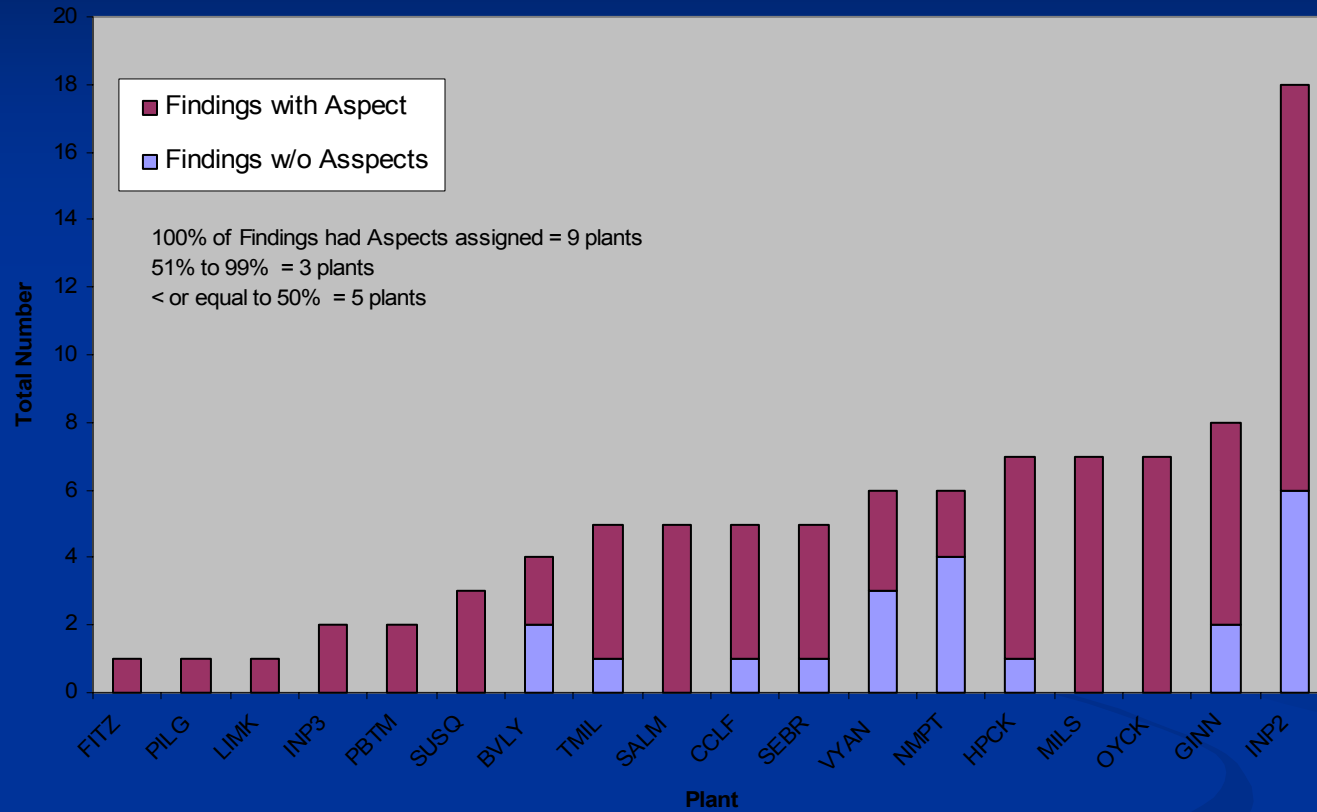
Cross Cutting Areas by Region from 2006Q3 until 2007Q1



Cross Cutting Aspects over last 3 quarters



Region I Findings from 2007Q1 through 2006Q3



Region I Cross Cutting Areas

