

REACTOR INSPECTION BRANCH

Branch Operating Instruction 010

SIGNIFICANCE DETERMINATION PROCESS TIMELINESS TRACKING AND REPORTING

010-01 PURPOSE

To describe how the Reactor Inspection Branch (IRIB) tracks and reports on the significance determination process timeliness metric.

010-02 BACKGROUND

Inspection Manual Chapter (IMC) 0609 establishes requirements for NRC's Significance Determination Process (SDP) program. Section 08.05 states, "The Agency's goal for SDP timeliness is that all final significance determinations be completed within 90 days from the issue date of the first official correspondence that described the finding and documented the need for further review to determine significance."

IMC 0307, "Reactor Oversight Process Self-assessment Program," establishes the following metrics for SDP timeliness: SDP-6a, the current metric, and SDP-6b, a pilot metric, potentially replacing the existing SDP timeliness metric.

1. SDP-6a Based on a quarterly audit of RPS data to identify the total number of inspection items finalized as greater than green that were under review for more than 90 days since:
 - (1) the date of initial licensee notification of the preliminary significance in an inspection report, or
 - (2) the item was otherwise documented in an inspection report as an apparent violation pending completion of a significance determination and not counted in either of the above categories.

At least 90% of all SDP results should be finalized within 90 days and 100% in 180 days.

2. SDP-6b Based on a quarterly audit of issues that were assessed by the Significance Determination Process/Enforcement Review Panel (SERP) to identify the total number of inspection items finalized as green or greater-than-green that were under review for more than 90 days since:

- (1) the date of initial licensee notification of the preliminary significance in an inspection report, otherwise documented in an inspection report as an “AV” pending completion of a significance determination, or
- (2) the date the item was presented to the SERP for review.

At least 90% of all SDP results that are counted per the criteria above should be finalized within 90 days on average and 100% in 180 days.

010-03 COLLECTING AND TRACKING SDP DATA

1. The SDP Timeliness Spreadsheet (ActiveSDPFindings.xls) is used as the data collection tool in which information is entered, formulas are calculated, graphs presenting data are updated, and PDF forms are created for monthly presentation on the ROP Digital City website (<http://nrr10.nrc.gov/rop-digital-city/ActiveSDPfindings.pdf>).

a. Sheet 1 captures the current fiscal year’s data, organized by region, as follows:

- At the top left, SDP Active Issues Tracking Table for issues in which the choice letter or inspection report has been sent: the region, the Enforcement Action (EA) or Alleged Violation (AV) number, plant, performance deficiency with cornerstone, inspection report number, inspection report date, preliminary color of the finding, choice letter date, regulatory conference date, final due date (calculated 90 days from choice letter or inspection report date), owner, status, days overdue, and days from the inspection report.
- Second from top at left, Significance Determination Has Been Completed Table: in addition to most fields listed above, final letter date, final SDP color, number of days from inspection report date to final SDP letter date, and number of days from choice letter date to final SDP letter date.
- Third from top at left, In the Items presented to the SERP (i.e. not yet documented in a IR)* Table: Tracking Number, plant, cornerstone and topic, first SERP date, last SERP date, preliminary SERP result, responsible division director or branch chief, status, and days since first SERP.
- Fourth from top at left, summaries by region: region, average age of all active SDPs, percentage closed within 90 days, the number of non-overdue issues, the number of overdue issues, number closed within 90 days, the total number closed, and the fiscal year metric (e.g., 90%).
- Fifth from top at left, fiscal year summaries: average age open issues as of September 30 for the fiscal year.
- Top center, FY'XX Timeliness Completed Issues by Region - bar chart showing for each region, the metric of 90% of issues being completed in 90 days
- Second from top at center, Average Age of Open Issues - bar chart by region

- Top right, # of Open Issues - Current - bar chart by region, showing non-due and overdue issues
 - Second from top at right, Average Age of Open Issues at the End of FY - bar chart of all issues for each fiscal year reported
- b. Sheet 2 captures data for completed issues since the beginning of the ROP: cornerstone (per IMC 2515) and topic, inspection report number, inspection report issue date or first SERP date, preliminary SDP color, final SDP letter due (calculated 90 days from date of inspection report), choice letter issue date, Actual SDP Letter Issue Date/Closure Report or Final SERP, final SDP color, days from inspection Report Date TO Final SDP Letter)
2. The IRIB SDP Timeliness Lead collects and tracks data as follows:
- a. Researches and collects potential SDP data from the following sources:
- ADAMS searches for enforcement actions and inspection reports
 - E-mails from the NRR Enforcement Coordinator
 - Pre-SERP packages
 - SDP/EA Request & Strategy Forms
- b. Examines the data and enters information onto the SDP Timeliness spreadsheet only if it meets the SDP criteria referenced in IMCs 0609, 0612 Appendix B: finding related to a cornerstone, greater than green, not willful, not Performance Indicator, not traditional enforcement. Every time information is added to the spreadsheet it is saved with the date changes are made (e.g., ActiveSDPFindings 07-02-07).
- c. Updates information on the spreadsheet from regions' SDP Update Forms (see Enclosure 1). [Per 12/14/06 memorandum from Stuart Richards to the deputy regional administrators, regions are to e-mail the SDP Update Form with current information on the first and third week of the month to SDP_Track@nrc.gov.]
- d. At least one week prior to the end of each month, creates a PDF report (described in 010-04 below).
- e. Sends to the SDP contacts in each region an e-mail from the SDP_Track mailbox, containing the PDF SDP report and a blank SDP Update Form. The e-mail requests regions to confirm the accuracy of the data and send updates via the form.

010-04 REPORTING SDP RESULTS

1. The IRIB SDP Timeliness lead takes the following actions to report the SDP timeliness metric.

- a. Updates the SDP Timeliness spreadsheet to incorporate any information regions provide to SDP_Track mailbox .
 - b. Selects the following as the Excel print area and creates a PDF file named ActiveSDPFindings.pdf:
 - SDP Active Issues Tracking Table (see Enclosure 2)
 - Significance Determination Has Been Completed Table (see Enclosure 3)
 - FY'XX Timeliness Completed Issues by Region Chart (example: Enclosure 4, left)
 - # of Open Issues - Current Chart (example in Enclosure 4, right)
 - Average Age of Open Issues Chart (example in Enclosure 5, left)
 - Average Age of Open Issues at the End of FY Chart (example in Enclosure 5, right)
 - c. Inserts a file to create an “Official Use Only” watermark on all pages that will appear only if the PDF file is printed
 - d. Sends an e-mail to NRRWebServices, with a copy to IPAB leads, requesting that the ROP Digital SDP link be updated with the attached ActiveSDPFindings.pdf file.
2. NRRWebServices posts the file on the internal website at <http://nrr10.nrc.gov/rop-digital-city/ActiveSDPfindings.pdf>.
 3. The IPAB leads for the Web change the month listed on the above listed website.

END

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