

**From:** Mary Jane Ross-Lee  
**To:** Sanchez, Chanel  
**Date:** 9/13/2007 3:19:01 PM  
**Subject:** close out of YT020070215

>>> Mary Jane Ross-Lee 9/13/2007 3:18:00 PM >>>  
To: Bob Meyer, Exelon Corporation

From: Frederick Brown, Director  
Division of Inspection and Regional Support  
US NRC/NRR  
via Mary Jane Ross-Lee

Subject : Procedure Backlogs

Mr. Meyer:

On August 24, 2007, the Commissioners of the United States Nuclear Regulatory Commission (NRC) received a copy of an e-mail from you to Mr. Ellis of the Institute of Nuclear Power Operations (INPO). In your e-mail, you stated that procedure backlogs are among the top three concerns of nuclear power plant operators and that you have requested both NRC and INPO to create a metric.

Although the NRC is mindful that correct and usable procedures are important to the safe operation of nuclear power plants, the NRC currently considers the reactor oversight process (ROP) to be adequate for identifying and addressing nuclear safety concerns that might arise from inadequate plant procedures. Accordingly, the NRC does not have any plans at this time to develop a metric that would be based upon procedure backlogs. However, I have forwarded your e-mail to the appropriate NRC staff so that they might consider procedure concerns as an area of emphasis for their ongoing reviews of operating experience at nuclear reactors. Should the NRC identify indications through these reviews that procedure deficiencies are contributing to an adverse trend in nuclear safety, the insights would be considered for appropriate action, including, if appropriate, revision of the ROP.

In the interim, I note that NRC and INPO regularly interact on matters of common interest. As part of these interactions the NRC will propose to discuss your concerns pertaining to procedure backlogs.

Thank you for your interest,

Mary Jane Ross-Lee  
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O12H1

**CC:** Brown, Frederick; Salgado, Nancy; Tobe, Celestia

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**From:** Mary Jane Ross-Lee

**Created By:** MJR2@nrc.gov

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