

## **Proposed Guidance Change to MC 0305 to Address Protracted Performance Indicator Results**

### **Change to MC 305 Guidance:**

Revise MC 0305 to include guidance for exclusion from aggregation in the action matrix, long-standing performance indicator results that have been addressed by inspection and licensee action and are determined to no longer reflect current licensee performance. The guidance would allow exclusion of a greater than green performance indicator result from assessment input to the Action Matrix. This exclusion would be applied in instances where a greater than green performance indicator has existed for four quarters, supplemental inspection activities have been completed and any resulting open inspection items related to the previous performance decline have been closed out in an inspection report.

### **Problem Statement:**

Performance indicators are intended to provide an objective indication of the need to modify NRC inspection resources or to take other regulatory actions based on licensee performance. Most performance indicators assess licensee performance over a period of 4 quarter or less, giving an indication of performance that aligns with the 4 quarter assessment cycle used in the ROP. However, for performance indicators with assessment inputs extending beyond 4 quarters<sup>1</sup>, the potential exists for performance indicator results that are not indicative of current licensee performance. The NRC assessment process does not currently provide any mechanism to incorporate insights from supplemental inspection of performance indicators, in a timely fashion, as part of the assessment process.

Changes to the assessment program guidance are needed to allow performance indicators results that are no longer indicative of licensee performance to be removed as an input to the assessment process upon completion of licensee actions to address the factors that contributed to the original performance decline.

### **Proposed Change:**

The proposed changes would be incorporated in a revision to guidance contained in MC 0305, Operating Reactor Assessment Program. A new subsection would be added to Section 06.06, Additional Action Matrix Guidance. The guidance could alternatively be included as an addition to Subsection 06.06.d, Timeframe for Including Performance Indicators and Inspection Findings in the Assessment Program.

#### 06.06.x Treatment of Protracted Performance Indicator Results

The NRC may refrain from considering safety significant performance indicator results in the assessment program for a performance indicator input that meets all of the following criteria:

- (a) Four quarters have elapsed since the green-white threshold was crossed.

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<sup>1</sup> Within the Mitigating Systems Cornerstone, the Mitigating Systems Performance Index (MSPI) accumulates performance data over a rolling 12 quarter period. Under the Emergency Preparedness Cornerstone, there are two performance indicators that accumulate performance data over a rolling 8 quarter time period. These are Drill/Exercise Performance and Emergency Response Organization Drill Participation. All other performance indicators accumulate performance data over a 4 quarter period or less.

- (b) Supplemental inspection activities have been completed and any resulting open inspection items related to the condition have been closed out in an inspection report.

If a performance indicator result meets all of the above criteria, it would not aggregate in the Action Matrix with other performance indicators and inspection findings nor would additional agency actions be taken. The performance indicator result would not be changed and would continue to be displayed on the NRC's web site with its current value (e.g., White, Yellow) and a footnote would be added to the Action Matrix summary for the plant reflecting the completion of the supplemental inspection and the exclusion of the PI result from the assessment.

Example A: The NRC has concluded that a white performance indicator in the mitigating systems cornerstone meets the criteria for a protracted performance indicator for Plant A. Plant A also has a white finding in the mitigating systems cornerstone. This plant would be considered in the Regulatory Response column of the Action Matrix. The protracted PI would not aggregate for Plant A in determining the Action Matrix column or required agency response. The PI result would continue to be displayed as White until the PI returns to Green. The Action Matrix summary for the plant would include a footnote reflecting the completion of supplemental inspection activities and the exclusion of the PI result from the assessment.

Example B: The NRC has concluded that a white performance indicator meets the criteria for a protracted performance indicator for Plant B. There are no other safety significant findings or performance indicators in the mitigating systems cornerstone or any other cornerstone for Plant B. This plant would be moved to the Licensee Response column of the action matrix. The PI result would continue to be displayed as White until the PI returns to Green. The Action Matrix summary for the plant would include a footnote reflecting the completion of supplemental inspection activities and the exclusion of the PI result from the assessment.