

PERIODIC ASSESSMENT OF CONSTRUCTION INSPECTION PROGRAM RESULTS

Draft

TABLE OF CONTENTS

2505-01	PURPOSE	1
2505-02	OBJECTIVES	1
2505-03	APPLICABILITY	1
2505-04	DEFINITIONS	1
2505-05	RESPONSIBILITIES AND AUTHORITIES	4
2505-06	BASIC REQUIREMENTS	5
06.01	Program Overview	5
06.02	Overall Construction Assessment Process	6
06.03	Performance Reviews	7
a.	Continuous Review	7
b.	Quarterly Review	8
c.	Semiannual Performance Review	8
06.04	Program Reviews	10
a.	Agency Action Review Meeting	10
b.	Commission Meeting	11
06.05	Annual Meeting with Licensee	11
a.	Scheduling	11
b.	Meeting Preparation	11
c.	Conduct of Licensee Meeting	12
06.06	NRC Responses to Licensee Performance	12
a.	Description of the Construction Response Table	12
b.	Expected Responses for Performance in Each Construction Response Table Column	13
06.07	Additional Construction Response Table Guidance	16
a.	Deviations from the CRT	16
b.	Timeframe for Significant Violations in the Assessment Program	16
06.08	Corrective Action Program (CAP) Effectiveness Reviews	17
06.09	Substantive Cross-Cutting Issues	19

PERIODIC ASSESSMENT OF CONSTRUCTION INSPECTION PROGRAM RESULTS

2505-01 PURPOSE

01.01 To establish a transparent and predictable process that objectively evaluates licensee performance of specific construction activities and the effectiveness of licensee/contractor oversight and quality assurance efforts associated with construction, module fabrication, and vendor activities.

01.02 This is the initial issuance of Inspection Manual Chapter (IMC) 2505. The staff recognizes that this IMC will likely undergo significant revisions during the next several years as both internal and external stakeholders provide feedback. This initial issuance is intended to promote such feedback, in order that the inspection program described in this IMC can benefit from the resulting revisions prior to the start of construction of future plants. Time frames listed for conducting or performing various activities associated with the assessment process are considered initial estimates and any necessary changes will be made after the NRC has experience in implementing this IMC.

2505-02 OBJECTIVES

02.01 To collect assessment information from construction inspections.

02.02 To arrive at an objective assessment of licensee oversight performance using inspection violations and substantive cross-cutting issues.

02.03 To assist NRC management in making timely and predictable decisions regarding appropriate agency actions used to oversee, inspect, and assess licensee performance.

02.04 To provide a process for informing the licensee and the public of the NRC's assessment and resultant adjustment in inspection oversight when the changes are a result of licensee performance issues.

02.05 To provide a process to follow up on areas of concern.

2505-03 APPLICABILITY

This manual chapter applies to all commercial nuclear reactors in the construction phase under the 10 CFR Part 52 licensing process. Once the facility has fully transitioned to the Reactor Oversight Process (ROP) then Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," will apply. The contents of this manual chapter do not restrict the NRC from taking any necessary actions to fulfill its responsibilities under the Atomic Energy Act of 1954 (as amended). Refer to IMC 0320, "Operating Reactor Security Assessment Program" for guidance related to the assessment of security-related inspection violations.

2505-04 DEFINITIONS

04.01 Assessment Inputs. As used in this manual chapter, assessment inputs are the violations and substantive cross-cutting issues for a particular construction site that are combined in the assessment process in order to determine appropriate agency actions in accordance with the Construction Response Table (Exhibit 2).

04.02 Assessment Period. The assessment period is a rolling 6 month period. The construction program assessment period will generally start on the date the NRC initially implements one of the IMC 2503, "Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work," or IMC 2504, "Construction Inspection Program - Non-ITAAC Inspections," inspection procedures and continues until the ROP has been fully implemented.

04.03 Audit. A periodic examination and checking of selected records or activities to verify their correctness or compliance with predetermined standards.

04.04 Contractor. Any organization or individual under contract for furnishing items or services to a licensee operating under the requirements of Appendix B of 10 CFR Part 50 or the commitments made in the Combined License (COL). It includes the terms Consultant, Vendor, Supplier, Fabricator, Constructor, and sub-tier levels of these organizations, where appropriate.

04.05 Combined License (COL). A combined construction permit and operating license with conditions for a nuclear power facility, issued pursuant to 10 CFR Part 52, Subpart C.

04.06 Construction Activities. Any activity associated with the construction, fabrication, or testing of structures, components, or systems either at the construction site or at remote fabrication or testing facilities. Construction activities also include related design and engineering activities, including design changes for the structures, systems, and components of the facility.

04.07 Construction Finding. A finding that is considered a greater-than-minor non-compliance with regulatory requirements or licensee commitments and is not associated with a specific ITAAC. A Construction Finding may result in enforcement action in accordance with the Enforcement Policy.

04.08 Construction Inspection Program Information Management System (CIPIMS). The automated database that provides the means to document, report, and track all NRC inspection activities and their results. It provides the means to integrate designated NRC inspections with their associated ITAAC and ultimately the results of those inspections with ITAAC determinations.

04.09 Construction Performance Review. A document prepared by the regional offices and used during the Semiannual Performance Review and Agency Action Review (if applicable) meetings. This document is prepared for all plants.

04.10 Cross-Cutting Aspect. Under development.

04.11 Cross-Cutting Area Component. Under development.

04.12 Cross-Cutting Theme. Under development.

04.13 Family of ITAAC. A grouping of ITAAC that are related through similar construction processes, resulting products, and general inspection attributes.

04.14 Finding. As used in this manual chapter, an observation that has been placed in context and assessed for significance.

04.15 Inspection. (1) An NRC activity consisting of examination, observation, or measurements to determine applicant/licensee/contractor/vendor conformance with requirements and/or standards. (2) Applicant/licensee/contractor/vendor quality control measures consisting of examination, observation or measurements to determine the conformance of materials, supplies, components, parts, appurtenances, systems, processes, or structures to pre-determined quality requirements.

04.16 Inspection History. A compilation of the inspection results for all inspections (construction and vendor inspections, Problem Identification and Resolution, etc.) performed by the NRC.

04.17 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). Those inspections, tests, analyses, and acceptance criteria identified in the combined license that if met are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will operate in conformity with the license, the provisions of the Atomic Energy Act, and the Commissions rules and regulations. The ITAAC identified in a combined license referencing a certified design will include the ITAAC defined in the Tier 1 documentation. Site-specific ITAAC, which include emergency planning ITAAC and ITAAC that are not part of the certified design, will also be included in a combined license. ITAAC are conditions of the license and must be met before fuel load.

04.18 ITAAC Attributes. A number of common, descriptive characteristics for each ITAAC that can be analyzed and weighted by a methodology that allows the ITAAC to be prioritized for inspection planning.

04.19 ITAAC Finding. A regulatory violation that is greater than minor, is associated with a specific ITAAC for which the licensee has submitted the ITAAC closeout letter, and is material to the ITAAC acceptance criteria. This type of finding could prevent the ITAAC from being closed out by the NRC and could require that previously closed ITAAC be re-opened. An ITAAC finding may be related to a single ITAAC or a family of ITACC. An ITAAC Finding may result in enforcement action in accordance with the Enforcement Policy.

04.20 ITAAC Matrix. An inspection planning tool that identifies groups (i.e., "families") of ITAAC, based upon common characteristics, which facilitate the ITAAC inspection sampling process and provide a consistent model for the inspection of ITAAC at plants of a similar design (see IMC 2503, Appendix B, for more details).

04.21 ITAAC-Related Construction Finding. A regulatory violation that is greater than minor, is associated with a specific ITAAC for which the licensee has not yet issued the ITAAC closeout letter, and is material to the ITAAC acceptance criteria. This type of finding could prevent the ITAAC from being closed out and therefore must be corrected and addressed in the licensee's ITAAC closure letter. An ITAAC-Related Construction finding may be related to a single ITAAC or a family of ITACC. An ITAAC-Related Construction Finding may result in enforcement action in accordance with the Enforcement Policy.

04.22 Quality Assurance. Quality Assurance (QA) comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service. Quality Assurance includes quality control.

04.23 Safety-Conscious Work Environment (SCWE). An environment in which employees feel free to raise safety concerns, both to their management and to the NRC, without fear of retaliation and where such concerns are promptly reviewed, given the proper priority based on

their potential safety significance, and appropriately resolved with timely feedback to employees.

04.24 Safety Culture. That assembly of characteristics and attitudes in organizations and individuals which establishes that, as an overriding priority, nuclear plant safety issues receive the attention warranted by their significance.

04.25 Site Construction Team. The core group of NRC inspectors assigned to a site under the leadership of a Senior Resident Inspector.

04.26 Targeted ITAAC. Targeted ITAAC are ITAAC that have been rank-ordered based on attributes and associated ITAAC impact. The targeted ITAAC and others (site-specific, etc) selected for direct inspection constitute the minimum, or baseline, amount of inspection that will be done for a particular design. Inspection Procedure (IP 65001) provides more information on the selection of targeted ITAAC for direct inspection.

2505-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Executive Director for Operations (EDO)

- a. Oversees the activities described in this manual chapter.
- b. Approves all deviations from the Construction Response Table (CRT).
- c. Informs the Commission of all approved deviations from the CRT.

05.02 Director, Office of New Reactors (NRO)

- a. Provides overall program direction for the reactor construction inspection program.
- b. Assesses the effectiveness, uniformity, and completeness of implementation of the construction inspection assessment program.
- c. Ensures that the public is informed of the results of the construction inspection assessment program as appropriate.

05.03 Deputy Regional Administrator for Construction

- a. Provides program direction for management and implementation of the construction assessments performed by the regional office.
- b. Ensures that the regional office staff includes adequate numbers of inspectors in the various disciplines necessary to carry out the construction assessment program as described in this chapter.
- c. Ensures that the public is informed of the results of the construction assessment program as appropriate.

05.04 Director, Office of Public Affairs.

Issues press releases following the completion of the Semiannual Performance Reviews.

05.05 Director, Division of Construction Inspection and Operational Programs (NRO/DCIP)

- a. Develops assessment program guidance.
- b. Collects feedback from the regional office and assesses execution of the construction inspection assessment program to ensure consistent application.
- c. Recommends, develops, and implements improvements to the construction inspection assessment program.
- d. Provides oversight of the Semiannual Performance Review meetings.
- e. Concurs on proposals by the regional office to extend a violation resulting in escalated enforcement beyond that allowed by Section 06.01.
- f. Concurs on the increased targeted inspection plan for plants in the Expanded Program and Unacceptable Performance columns of the CRT.

05.06 Regional Division of Construction Projects Director

- a. Chairs the Semiannual Performance Review meeting.
- b. Approves proposals to re-allocate resources as a result of licensee performance issues.

05.07 Regional Division of Construction Projects Branch Chiefs

Approve proposals to re-allocate resources for other than licensee performance issues.

05.08 Regional Construction Inspection Staff

- a. Administers and implements the construction inspection program and issues inspection reports.
- b. Provides NRO with the status of inspections related to specific ITAAC.
- c. Acts as the licensee's primary NRC contact for the construction inspection program.
- d. Coordinates the development of, and revision to, the site inspection plan.
- e. Integrates all of the inspection violations and other inputs to develop an overall assessment of licensee performance.

2505-06 BASIC REQUIREMENTS

06.01 Program Overview. A key objective of the NRC construction inspection program is to perform timely assessments of the quality of construction/fabrication activities to allow flexibility to refocus inspection effort in areas where additional NRC oversight is warranted. This will ensure that adequate resources are applied so that the ITAAC are adequately inspected and will promote the early resolution of construction problem areas by increasing NRC attention where warranted to assure licensee/contractor corrective actions are prompt and thorough. To accomplish that objective, the NRC will use the construction assessment process to periodically evaluate the inspection history of selected construction activities, other inspection activities (i.e.,

Problem Identification and Resolution (PI&R), etc.), enforcement history, allegations, and safety culture to determine the effectiveness of licensee/contractor/vendor quality assurance in assuring construction quality. Based on the results of each assessment, NRC management will determine whether the existing level of NRC oversight is sufficient or should be increased. Exhibit 1 shows how the assessment process fits into the overall construction inspection program.

For the purposes of assessment, a significant violation (i.e. a violation resulting in escalated enforcement) is carried forward for six months from the date of the inspection report in which the apparent violation is issued or until the NRC accepts the licensee's corrective actions, whichever is longer. Therefore, a significant violation will no longer be considered in the assessment process after the above conditions have been met unless the NRC has justification to keep the violation open in accordance with Section 06.07.b. Additionally, substantive cross-cutting issues will be carried forward until closed in a Semi-Annual Performance Review letter.

The evaluation of inspection history will be conducted of activities inspected in accordance with Inspection Manual Chapter (IMC) 2504, "Construction Inspection Program - Non-ITAAC Inspections," and at the ITAAC "family" level to determine the effectiveness of licensee/contractor/vendor quality assurance in assuring construction quality. An ITAAC family consists of those ITAAC that reside within one of the 114 cells of the ITAAC Matrix (see IMC "2503, Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work," Appendix B). From the ITAAC within a family a certain portion of the structures, systems, and components (SSCs) associated with that ITAAC have been pre-selected for each reactor design (targeted ITAAC). Additionally, for ITAAC families that do not contain any targeted ITAAC, one ITAAC will be selected for direct inspection. These ITAAC, along with selected site-specific ITAAC, will represent the minimum sample set, or baseline, that is considered mandatory for direct inspection. Further information on the protocol for selecting ITAAC for inspection is contained in IMC 2503 and Inspection Procedure (IP) 65001, "Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work".

The NRC will conduct a phased review that requires NRC inspectors to document observations of quality assurance and construction of SSCs that have ITAAC as they are completed by the licensee throughout the construction process. Since the NRC utilizes a sampling methodology, significant issues that are identified could potentially have broader implications on the licensee's performance than just the single issue. Based on this, significant issues (escalated enforcement actions or substantive cross-cutting issues) are the input to the Construction Response Table (CRT) (Exhibit 2) and could result in the inspection program being expanded to review either additional samples in the area of concern or the review of non-targeted ITAAC in the area of concern.

06.02 Overall Construction Assessment Process. Licensee performance is reviewed over a 6-month period through the construction assessment process (Exhibit 3).

The assessment program collects oversight information from continuous NRC inspections of ongoing construction activities, the results of periodic PI&R inspections, enforcement history, allegation trends, and safety culture to provide an integrated assessment of licensee performance. Additionally, the results of licensee self-assessments and independent assessments will be used to self-assess the NRC assessment and inspection process. The assessment process will examine inspection observations and violations documented in the Construction Inspection Program Information Management System (CIPIMS) to determine if the licensee has demonstrated that its control and oversight of construction programs and

processes has resulted in quality products. As set forth in both IMC-2503 and IMC-2504, the observation of construction activities will include monitoring the implementation of the Quality Assurance (QA) program by the licensee and its contractors to ensure their ability to find and appropriately characterize and resolve any occurrences of conditions adverse to quality.

A licensee's ability to provide adequate levels of oversight is a key component of the NRC assessment and its decision whether to keep the level of inspection at the baseline level or to increase inspection effort. Inspections may be increased in areas where licensee performance warrants additional review. This could involve increasing samples of the targeted ITAAC in the area of concern or could involve selecting additional ITAAC from the "non-targeted" ITAAC group. Based on this assessment information, a determination of the appropriate level of NRC construction oversight will be made in accordance with the CRT.

For the purpose of assessment, defining the point that construction begins requires that sufficient activity be occurring for any assessment to be meaningful. For that reason the construction program assessment period will generally be considered to have started on the date the NRC initially implements one of the IMC 2503 or IMC 2504 inspection procedures and will continue until the Reactor Oversight Process (ROP) has been fully implemented. However, if there are sufficient activities and inspections occurring prior to that date then the assessment period can be started at a date that will allow those activities to be assessed. In either case, the assessment period is a rolling 6 month period that contains two quarters of inspection violations and the date being utilized as the start of the assessment process should be communicated to the licensee. The 6 month period and each quarter are measured starting with the date that the assessment process started and will use that anniversary date throughout the construction assessment process. It is recognized that the amount of data specified in this Manual Chapter will not be available for the initial assessments. In these instances, the data available should be used as long as it does not exceed what is specified. Once a plant transitions to the ROP the assessment process will revert to the calendar year process outlined in IMC 0305, "Operating Reactor Assessment Program."

The construction assessment process is divided into three basic parts: continuous assessment, quarterly assessment, and semi-annual assessment (Semiannual Performance Review (SPR)). The continuous assessment is principally conducted at the site construction team level to allow for evaluation of re-allocating NRC resources to ensure that the inspection program is being adequately implemented. This allows the site construction team (including the Branch Chief) to make adjustments to the inspection plan as the licensee's schedule changes. The quarterly and SPR assessments are principally focused on licensee performance and the need to reallocate resources and/or add resources to address licensee performance. However, if the need arises to respond to a licensee performance issue sooner than the next quarterly assessment the process is flexible enough to accommodate this need. The SPR assessment results will be communicated to the licensee and the public. Agency response to assessment results will also be communicated to the licensee and the public when changes are made as a result of licensee performance issues. Follow-up agency actions, as applicable, are conducted to ensure that the licensee's/contractor's/vendor's corrective actions designed to address performance weaknesses were effective.

06.03 Performance Reviews. The overall process for the assessment of licensee performance consists of the series of actions that are listed below.

- a. Continuous Review. The Resident Inspectors and regional Branch Chiefs in the regional office will continuously monitor the performance of their assigned construction sites using the results of the evaluation of inspection history of selected construction

activities contained in CIPIMS. Inspections are conducted on a continuous basis in accordance with IMC 2503 and 2504. During the assessment review, the ability of the licensee to find and successfully resolve problems will be considered when evaluating the licensee's ability to ensure that the completed plant will be able to operate in accordance with the design.

The Region may issue a Mid-Quarter Assessment Letter and address an issue, in accordance with the CRT, between the normal quarterly assessments if a significant inspection violation (i.e. violations resulting in escalated enforcement action) is identified.

- b. Quarterly Review. Each region conducts a quarterly (3 month) review utilizing inspection violations, enforcement history, allegation trends, and safety culture compiled over the previous 6 months. This review is conducted within 4 weeks after the conclusion of each quarter of the semiannual assessment period. The most recent quarter of inspection violations shall be considered in determining agency actions to be taken per the CRT.

The responsible Division of Construction Projects (DCP) Branch Chief reviews the inspection violations contained in CIPIMS to identify any performance trends. The Branch Chief shall utilize the CRT to help identify where there are NRC actions that should be considered which are not already embedded in the existing inspection plan. Quarterly Assessment letters are normally issued within 2 weeks after the quarterly review for any new significant violations.

If, based on the continuous review discussed above, the region issued a Mid-Quarter Assessment letter for any significant inspection violations during the past quarter, a subsequent Quarterly Assessment letter would not be necessary if its only purpose is to re-iterate any issues that had been previously addressed to the licensee.

For plants whose performance is in the Expanded Program column of the CRT, consideration shall be given at each quarterly review for engaging senior licensee and agency management in discussions associated with taking additional regulatory actions (as appropriate). If there are significant changes in the inspection plan for a plant in the Expanded Program column of the CRT, the region should issue a separate Quarterly Assessment letter in order to ensure the licensee is aware of these changes.

- c. Semiannual Performance Review. The regional office conducts an SPR utilizing the inspection violations compiled over the previous 6 months. This review incorporates activities from the previous SPR and quarterly review, including consideration of the conclusions of any independent assessments, such as the Institute of Nuclear Power Operations (INPO). The purpose of considering independent assessments is to provide a means of self-assessing the NRC inspection and assessment process's. References to INPO conclusions will not be included in the assessment letters. The output of this review is an SPR Letter. The SPR and subsequent SPR Letters should only discuss issues when the inspection was completed prior to the end of the assessment period. Additional activities include planning inspection activities through the next 6 months, discussing any potential substantive cross-cutting issues, and developing an input (if applicable) to support the Agency Action Review Meeting (AARM). The SPR meeting should be held within 6 weeks of the end of the assessment period. The CRT will be used to determine the scope of agency actions in response to assessment inputs.

In preparation for the SPR's, the regional office shall develop a meeting agenda as well as provide the Construction Performance Review and the proposed inspection plan for the plant being assessed. The Construction Performance Review package will assist the regional office in conducting the meeting and will form the basis for the semiannual assessment letter. These packages will also be used at the Performance Summary Meeting (if applicable) as well as providing input to the AARM (if applicable). The Construction Performance Review should include background on the facility, what CRT column they are in, any significant violations, any substantive cross-cutting issues with an evaluation of each, the status of NRC/licensee actions if other than in the Baseline Program column, the status of the CAP effectiveness reviews, any recommendations, and any other areas of interest (i.e., ITAAC closure status, allegation trends, etc), as well as a proposed inspection plan. Each page of the meeting agenda and Construction Performance Review should be clearly marked as "pre-decisional" to ensure that the document is handled properly and not inadvertently released to the public.

In order to aid in the discussion and integration of plant issues, the regional office should prepare a plant-specific CRT that details the time line and consideration of significant violations (escalated enforcement issues) and substantive cross-cutting issues in the assessment program as an attachment to the Construction Performance Review. The plant specific CRT should display the quarterly status of significant violations, substantive cross-cutting issues, and the associated CRT column over a sufficient time line.

The SPR meeting is chaired by the DCP Division Director or his/her designee. The regional Branch Chiefs present the results of the semiannual review to the Deputy Regional Administrator for Construction (or designee). Other routine participants should include the Division of Construction Inspection Program (DCIP) Branch Chiefs, applicable regional and resident inspectors, a representative from the NRO Construction Inspection and Allegations Branch (CCIB), the regional Allegations Coordinator or the Agency Allegations Advisor, and any other additional participants deemed necessary by the regional office. The following representatives should also participate if there are pertinent performance issues that should be factored into the performance for a particular plant: the senior representatives from the Division of New Reactor Licensing, the Quality and Vendor Inspection Branch, Office of Investigations, Office of Enforcement, and Office of Research. The role of the various headquarters participants during the SPR meeting is to provide: 1) an opportunity for these offices to share any significant insights into license performance over the course of the assessment period, 2) an independent validation of the regional office's assessment of licensee performance from their office's perspective, and 3) clarifying or ancillary remarks regarding ongoing or current issues under their cognizance. The average time allocated for each plant review is intended to be between 30 minutes and 2 hours and should be consistent with the number and significance of plant issues. These are estimates for planning purposes only.

A Performance Review Summary briefing may be necessary at the conclusion of the SPR meeting to summarize its results with NRO senior management. The regional staff will summarize the results of the SPR for those plants whose performance in one or more quarters in the previous 12 months has been in the Increased Focus Program column, Expanded Program column, or Unacceptable Performance column of the CRT. The Performance Review Summary briefing will be scheduled within 2 weeks of the SPR meeting. This briefing will occur before the issuance of the semiannual assessment letter.

During the Performance Review Summary briefing, the Director of NRO (or designee) will preside over the briefing while the Deputy Regional Administrator for Construction (or designee) will lead the discussion for the region. The Performance Review Summary briefing is an informational briefing vice a decision-making meeting. In preparation for the briefing, CCIB will develop an agenda for the meeting with input from the regional office. The regional office should provide their input to CCIB 3 working days prior to the briefing. The purpose of this briefing is for regional management to engage headquarters management on those discussion plants in order to ensure awareness of the plants to be discussed at the AARM and those agency actions already taken in response to plant performance.

The output of the SPR is the SPR Letter. These letters shall be issued within 3 weeks of the completion of the SPR meeting. Signature authority for each SPR assessment letter is determined by the most significant column of the CRT that the plant has been in over the four quarters of the assessment period. This letter shall contain:

1. A summary of significant violations (violations resulting in escalated enforcement action) for the most recent quarter as well as discussion of previous action taken by the licensee and the agency relative to these issues. Performance issues from previous quarters may be discussed if:
 - (a) The agency's response to an issue had not been adequately captured in previous correspondence to the licensee.
 - (b) These issues, when combined with assessment inputs from the most recent quarter, result in increased regulatory action per the CRT that would not be apparent from reviewing only the most recent quarter's results.
2. A discussion of any deviations from the CRT during the assessment period.
3. A qualitative discussion of substantive cross-cutting issues, if applicable.
4. A discussion of the licensee's progress in addressing a substantive cross-cutting issue, if documented in the previous semiannual assessment letter.
5. A discussion of significant (Severity Level III or greater) enforcement actions.
6. A statement of any actions to be taken by the agency in response to safety significant issues, as well as any actions taken by the licensee.
7. An inspection plan consisting of approximately 6 months of activities (from the issuance of the semiannual assessment letter). The inspection plan will consist of **Report 22** from the Reactor Program System (RPS).

06.04 Program Reviews

- a. Agency Action Review Meeting. An AARM is conducted several weeks after issuance of the ROP annual assessment letters. This meeting is attended by appropriate senior NRC managers and is chaired by the Executive Director for Operations (EDO) or designee. This meeting is a collegial review by senior NRC managers of (1) the

appropriateness of agency actions for plants with significant performance issues using data compiled during the semiannual assessment meetings, (2) trends in overall industry performance, (3) the appropriateness of agency actions concerning fuel cycle facilities and other materials licensees with significant performance problems, (4) the results of the reactor oversight process assessment, including a review of approved deviations from the Action Matrix and (5) the results of the construction oversight process assessment, including a review of approved deviations from the CRT. Plants under construction with significant performance weaknesses are those plants that are in the Expanded Program or Unacceptable Performance columns of the CRT. This meeting is more completely described in Management Directive 8.14, "Agency Action Review Meeting."

- b. Commission Meeting. The EDO will brief the Commission semiannually to convey the results of the AARM, including a discussion of any deviations from the CRT. The Commission should be briefed within approximately four weeks of the AARM, consistent with Commission availability, to ensure that the information presented is as current as possible.

06.05 Annual Meeting with Licensee

- a. Scheduling. A public meeting with the licensee will be conducted on an annual basis following issuance of every second SPR assessment letter to discuss the results of the NRC's assessment of the licensee's performance over the prior 12 month period. For plants that have been in the Expanded Program column or Unacceptable Performance column of the CRT during the previous 12 months, these meetings should be scheduled within 8 weeks of the end of the assessment period. These meetings should be conducted no earlier than 1 week after the SPR assessment letter is issued in order to allow time for the licensee to review the contents of the letter. The 8-week requirement may occasionally be exceeded to accommodate the licensee's schedule or regional scheduling conflicts. These meetings may be scheduled within 3 months of the issuance of the SPR assessment letters for plants that have been in the Baseline Program Review or Increased Focus Program column of the CRT during the previous 12 months. The meeting is conducted onsite or in the vicinity of the site and should be scheduled to ensure that it is accessible to members of the public. The regional office should use this meeting as an opportunity to engage interested stakeholders on the performance of construction at the plant and the role of the agency in ensuring that the plant is being constructed in accordance with the design and NRC regulations. NRC management, as specified in the CRT, conducts the public meeting. The appropriate level of NRC management to chair this meeting is determined by the most significant column of the CRT that the plant has been in during the previous 12 months. The highest level of NRC management, as allowed in the plant's performance column of the CRT, should chair the annual public meeting for those plants that currently have substantive cross-cutting issues as described in the semiannual assessment letters.
- b. Meeting Preparation. The region shall notify those on distribution for the SPR assessment letters of the meeting with the licensee. The region shall notify the media and State and local government officials of the meeting with the licensee and the issuance of the SPR assessment letter. Commensurate with the level of historical interest and/or construction issues, the regional office should use the following additional tools to inform members of the public of the meeting, as appropriate: press releases, advertisements in local newspapers, or letters soliciting attendance to known interested parties.

- c. Conduct of Licensee Meeting. The annual public meeting is intended to provide an opportunity for the NRC to engage interested stakeholders on the performance of construction of the plant and the role of the agency in ensuring that the plant is being constructed in accordance with the design and NRC regulations. NRC management, as specified in the CRT, will discuss the agency's evaluation of licensee performance as documented in the SPR assessment letter. This meeting is considered to be a Category 1 meeting in accordance with the Commission's policy on public meetings.

The last two SPR assessment letters provide the minimum performance information that should be conveyed to the licensee during the annual public meeting. However, this does not preclude the presentation of additional plant performance information when placed in the proper context. The licensee should be given the opportunity to respond at the meeting to any information contained in the SPR assessment letter. The licensee should also be given the opportunity to present to the NRC any new or existing programs that are designed to maintain or improve their current performance.

The annual meeting will be a public meeting with the exception that the meeting must be closed for such portions which may involve matters that should not be publicly disclosed under Section 2.390 of Title 10 of the Code of Federal Regulations (10 CFR 2.390). Members of the public, the press, and government officials from other agencies are considered as observers during the conduct of the meeting. However, attendees should be given the opportunity to ask questions of the NRC representatives after the conclusion of the meeting.

06.06 NRC Responses to Licensee Performance

- a. Description of the Construction Response Table. The CRT (Exhibit 2) was developed with the philosophy that, within a certain level of performance (i.e., the Baseline Program column), licensees would address their performance issues without additional NRC engagement beyond the baseline inspection program. Agency action beyond the baseline inspection program will normally occur only if assessment input thresholds are exceeded. The CRT identifies the range of NRC and licensee actions and the appropriate level of communication for varying levels of licensee performance.

Overall response to licensee performance will be determined by the number of violations that rise to the level of escalated enforcement (Severity Level I, II, or III) in combination with the number of substantive cross-cutting issues. The NRC will utilize a graded approach in determining the response to the identified issues. This graded approach will result in an increase in sampling in the area(s) of concern, an increase in the ITAAC being inspected, and/or the issuance of a Confirmatory Action Letter (CAL), Demand For Information, and/or the issuance of an Order. Increased inspection, whether increased sampling or the selection of additional ITAAC, will be conducted through the use of expanded inspections.

The NRC assessment of ITAAC inspection results requires consideration of the specific licensee controls and contractor programs that yielded the subject violations. For example, if significant violations in a construction activity result in increased inspection targets for a specific family of ITAAC, the responsible NRC personnel should ensure that the targets selected for additional inspection actually represent the problematic licensee/contractor's/vendor's work or the scope of construction evidencing the inadequate licensee controls. Consideration may also be given to targets outside of this

scope to ensure that the problem is not more widespread.

A few terms are used throughout the discussion of the CRT. These are:

1. **Regulatory Performance Meetings.** Regulatory performance meetings are held between licensees and the agency to discuss corrective actions associated with significant violations (i.e. violations resulting in escalated enforcement action). Each significant assessment input shall be discussed in one of the forums listed below in order to arrive at a shared understanding of the performance issues, underlying causes, and planned licensee actions. These meetings may take place at periodic inspection exit meetings between the agency and the licensee, a periodic NRC management visit, conference calls, or public meetings after completion of the expanded inspection. This meeting should be documented in an inspection report or a public meeting summary, as appropriate.
 2. **Licensee Action.** Anticipated actions by the licensee in response to overall performance are indicated by the appropriate column of the CRT. If these actions are not being taken by the licensee then the agency may consider increasing the scope of the applicable expanded inspection to appropriately address the area(s) of concern. This would not be considered a deviation from the CRT in accordance with Section 06.07 of this manual chapter.
 3. **NRC Inspection.** The range of NRC inspection activities in response to performance indicated by the appropriate column of the CRT.
 4. **Regulatory Actions.** The range of actions that may be taken by the agency in response to performance indicated by the appropriate column of the CRT.
 5. **Communication.** Communication between the licensee and the NRC is based on a graded approach. For declining licensee performance, higher levels of agency management will review and sign the assessment letters and conduct the annual public meeting.
- b. Expected Responses for Performance in Each Construction Response Table Column. The CRT lists expected NRC and licensee actions based on the inputs to the assessment process. Actions are graded such that the agency becomes more engaged as licensee performance declines. Listed below are the ranges of expected NRC and licensee actions for each column of the CRT:
1. CRT Baseline Program Column. Violations are not greater than Severity Level IV and there are no substantive cross-cutting issues. The licensee will receive only the baseline inspection program and identified deficiencies will be addressed through the licensee's corrective action program.
 2. CRT Increased Focus Program Column. There are no more than a combination of two Severity Level III violations and/or substantive cross-cutting issues. The licensee is expected to place the identified deficiencies in its corrective action program and perform an evaluation of the root and contributing causes. The licensee's evaluation will be reviewed during expanded inspection procedure (IP) 90001, "Increased Focus Program Inspection." Following completion of the inspection, the branch chief or division director should discuss the performance deficiencies and the licensee's proposed corrective actions with the licensee.

The regulatory performance meeting will normally occur at an inspection exit meeting, at a periodic NRC management visit, or a conference call between the licensee and the appropriate branch chief (or division director).

3. CRT Expanded Program Column. A combination of three Severity Level III violations or substantive cross-cutting issues, or one Severity Level II violation. The licensee is expected to place the identified deficiencies in its corrective action program and perform an evaluation of the root and contributing causes for both the individual and the collective issues. *This evaluation should also determine whether deficient safety culture components caused or significantly contributed to the significant performance issues. If so, those safety culture deficiencies should be entered into the plant's corrective action program.*

The licensee's evaluation will be reviewed during expanded inspection procedure IP 90002. Also, an independent assessment of the extent of condition will be performed by the region using appropriate inspection procedures chosen from the tables contained in IP 90002, "Expanded Program Inspection." *Additionally, the NRC may request that the licensee complete an independent assessment of safety culture, if the NRC identified through the IP 90002 inspection and the licensee did not recognize that one or more safety culture component deficiencies caused or significantly contributed to the significant performance issues. In this context, an independent assessment is an assessment that is performed by qualified individuals that have no direct authority and have not been responsible for any of the areas being evaluated.* Following completion of the inspection, the regional administrator (or designee) should discuss the performance deficiencies and the licensee's proposed corrective actions with the licensee. The regulatory performance meeting will normally consist of a public meeting between the licensee and the appropriate regional administrator (or designee).

4. CRT Unacceptable Performance Column. One Severity Level I violation, multiple Severity Level II violations, or a combination of the following: One Severity Level II and a total of four Severity Level III violations/substantive cross-cutting issues; or a total of seven Severity Level III violations/substantive cross-cutting issues. The licensee is expected to place the identified deficiencies in its corrective action program and perform an evaluation of the root and contributing causes for both the individual and the collective issues. This evaluation may consist of a third party assessment. *The licensee is also expected to perform an independent assessment of its safety culture. In this context, an independent assessment is an assessment that is performed by qualified individuals that have no direct authority and have not been responsible for any of the areas being evaluated.*

Expanded inspection procedure IP 90003, "Unacceptable Performance Inspection" will be performed to review the breadth and depth of the performance deficiencies, *assess the licensee's evaluation of its safety culture, and independently assess the licensee's safety culture.* A decision not to independently perform an assessment of the licensee's safety culture would be a deviation from the CRT and would have to be approved in accordance with Section 06.07. The expanded inspection plan must be approved by the appropriate regional division director with concurrence of the Director of the Division of Construction Inspection and Operational Programs (DCIP).

Following the completion of the inspection, the EDO or his designee, in conjunction with the regional administrator and the Director of NRO, will decide whether additional agency actions are warranted. These actions could include additional expanded inspection, a demand for information, a CAL, or issuance of an order, up to and including a stop work order. At a minimum, the regional office will issue a CAL to document the licensee's commitments as discussed in their performance improvement plan, as well as any other written or verbal commitments. The regional administrator should document the results of their decision in a letter to the licensee. These regulatory actions may also be considered prior to the completion of expanded inspection procedure IP 9003, if warranted. The regulatory performance meeting will normally consist of a public meeting between the licensee and the EDO or designee).

Note: Other than the CAL, the regulatory actions listed in this column of the CRT are not mandatory. However, the regional office should consider each of these regulatory actions when significant new information regarding licensee performance becomes available.

Due to the depth and/or breadth of performance issues reflected by a plant being in the Unacceptable Performance Column of the CRT, it is prudent to ensure that actual performance improvements (which typically take longer than several quarters to achieve) have been made prior to closing out the significant violations and exiting the Unacceptable Performance Column of the CRT. In making this determination, the regional offices should consider whether:

- (a) New plant issues or violations do not reveal similar significant performance weaknesses.
- (b) The licensee's performance improvement program has demonstrated sustained improvement.
- (c) NRC expanded inspections show licensee progress in the principal areas of weakness.
- (d) There were no issues that led the NRC to take additional regulatory actions beyond those listed in the Unacceptable Performance Column of the CRT. Additionally, the licensee has made significant progress on any regulatory actions that were imposed (i.e., CALs, orders, 50.54(f) letters) because of the performance deficiencies that led to the Unacceptable Performance Column designation.

After the original significant violations have been closed out, the licensee will return to the CRT column that is represented by the other outstanding inputs to the CRT. Additionally, for a period of up to one year after the initial significant violations have been closed out, the regional offices may utilize some actions that are consistent with the Expanded Program Column or Unacceptable Performance Column of the CRT in order to ensure the appropriate level of agency oversight of licensee improvement initiatives. These actions, which do not constitute a deviation from the CRT, include senior management participation at periodic meetings/site visits focused on reviewing the results of

improvement initiatives (such as efforts to reduce corrective action backlogs and progress in completing the Performance Improvement Plan), expanded inspection procedure IP 90003 and CAL follow up inspections (not to exceed [REDACTED] hours of direct inspection without concurrence from the Director, DCIP, the annual public meetings, and authorization of the contents of the subsequent assessment letters. The actions taken above those required by the CRT shall be discussed at the following SPR meetings to ensure an appropriate basis for needing the additional actions to oversee the licensee improvement initiatives. These actions will also be described in the following SPR assessment letters until the end of the extended period of time. All assessment letters that address these additional actions shall include CCIB on concurrence.

The regional offices must convey the specific actions that the licensee needs to address to remove the significant violations that caused the licensee to enter the Unacceptable Performance Column from consideration in the assessment program. The correspondence to the licensee describing the extension of the significant violation(s) in the assessment program beyond the normal period discussed in Section 06.01 must be authorized by the appropriate regional division director with the concurrence of the Director, DCIP.

06.07 Additional Construction Response Table Guidance

- a. Deviations from the CRT. There may be rare instances in which the regulatory actions dictated by the CRT may not be appropriate. In these instances, the agency may deviate from the CRT (which is described in Section 06.06.a of this manual chapter) to either increase or decrease agency action. A deviation is defined as any regulatory action taken that is inconsistent with the range of actions discussed in Section 06.06 of this manual chapter. Deviations from the CRT shall be documented in the appropriate letter to the licensee (i.e., Quarterly or SPR Assessment letter) or separate docketed correspondence. The EDO shall approve all deviations from the CRT and inform the Commission when deviations are approved and annually at the Commission meeting on the results of the AARM. Memorandums requesting deviations from the CRT should be initiated by the applicable regional administrator to the EDO and should go through the Director of NRO for program office approval. Any deviations from the CRT shall be documented in the subsequent SPR assessment letter. Letters requesting deviations from the CRT should include a synopsis of the licensee performance deficiencies, the required NRC actions per the CRT for these inputs, the proposed alternative actions, and the region's rationale for requesting the deviation. Examples of when deviations from the CRT may be considered are: (1) when the violation resulting in escalated enforcement is un-related to the construction process, such as a licensed operator or licensee failing to report a change in medical condition that affects an operators license; (2) when the decision is made not to independently perform an assessment of the licensee's safety culture if licensee performance was determined to be in the Unacceptable Performance Column.
- b. Timeframe for Significant Violations in the Assessment Program. Significant violations (i.e. violations resulting in escalated enforcement action) are normally considered in the assessment program from the date the inspection report with the apparent violation is issued until the NRC accepts the licensee's corrective actions plus 6 months . However, there may be instances in which the corresponding expanded inspection reveals substantive inadequacies in the licensee's evaluation of the root causes of the original performance deficiency, determination of the extent of the performance problems, or the

actions taken or planned to correct the issue. Significant weaknesses in the licensee's evaluation of the performance issue may be subject to additional agency action, including additional enforcement actions or an expansion of the expanded inspection procedure as necessary to independently acquire the necessary information to satisfy the inspection requirements. Also, for significant violations, the original performance issue will remain open and will not be removed from consideration in the assessment program until the weaknesses in the evaluation are addressed and corrected, the NRC has accepted those actions, and 6 months have elapsed. The regional offices must convey the specific weaknesses that the licensee needs to address in order to remove this violation from consideration in the assessment program. The violation will be removed from consideration of future agency actions (per the CRT) when the inadequacies in the licensee's efforts to address the issue have been corrected, the NRC has accepted the licensee's corrective actions, and 6 months have passed since the associated violation was documented in an inspection report. This notification should be included in the cover letter of the expanded inspection report and the violation will be removed from consideration in the assessment program after the end of the period discussed above.

The correspondence to the licensee describing the extension of an inspection violation in the assessment process beyond the normal time frame must be authorized by the appropriate regional division director with concurrence of the Director of the Division of Construction Inspection and Operational Programs (DCIP). If this approach is taken by the agency, the region should issue a violation under 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," if applicable.

06.08 Corrective Action Program (CAP) Effectiveness Reviews. A fundamental goal of the NRC's oversight of new construction activities is to establish confidence that licensees (and their contractors/vendors) are detecting and correcting problems in a manner that ensures quality and safety is a top priority and that construction activities will be completed in a manner that ensures each plant is constructed in accordance with the design and will operate safely. A key premise of NRC oversight is that weaknesses in a licensee's CAP will manifest themselves as performance issues that will be identified during the inspection program. Completion of these objectives is accomplished by resident inspectors screening CAP issues on a frequent basis, by performing a semiannual trend review, by sampling issues during each inspectable area inspection, by follow-up of all NRC identified issues, and by performing periodic PI&R team inspections.

The use of non-cited violations (NCVs) as part of the enforcement process is predicated on a licensee having an adequate CAP in which identified issues are entered into and effectively resolved in a timely manner. Because the CAP at construction sites will be new and implemented initially by individuals with limited experience with the new program and because construction will involve program implementation by contractors, the NRC will delay the use of NCVs pending confirmation that the new program is adequate and being adequately implemented. Therefore, prior to or near the beginning of construction for each plant, PI&R inspections will be conducted to allow the NRC to gather sufficient information to make a timely decision that the licensee's CAP has been adequately demonstrated for the purposes of issuing NCVs. After the staff has concluded that a licensee's CAP is adequate, the PI&R inspections will be conducted in accordance with a normal schedule.

Inspections will be conducted in accordance with inspection procedure (IP) 40505, "Effectiveness of Process to Identify, Resolve, and Prevent Construction Problems," to review the CAP program and to review the licensee's implementation of the CAP. These inspections

can be done either as a single inspection or as two separate inspections. The inspections will be conducted following the licensee's notification to the NRC that it is ready for the inspection to be conducted. Since a licensee would need to have a CAP in place prior to the start of construction, the program review could be completed before construction begins. For the implementation inspection, the licensee would need to determine that sufficient CAP activity has occurred prior to notifying the NRC that it is ready for the inspection to be conducted. Sufficient CAP activity could include vendor and modular construction activities that the licensee is overseeing. The results of resident and other inspections (vendor, remote location, specialist inspections, etc) should be considered along with the results of the PI&R inspections in formulating a decision.

In order for the licensee to successfully demonstrate to the NRC the effectiveness of their CAP, the inspections (PI&R, baseline, vendor, etc) conducted previously cannot have identified any significant issues related to the CAP. Significant issues are considered to be any Severity Level I, II, or III violations or any substantive cross-cutting issues related to an area of the CAP. If significant issues have been previously identified then review of the licensee's corrective actions for those issues need to have been conducted to ensure that effective corrective actions have been taken to resolve the issues such that there is reasonable assurance that they will not recur. Both a programmatic and implementation inspection needs to have been conducted that conclude the licensee's CAP is adequate and being adequately implemented before a conclusion can be reached on its effectiveness. The determination of whether or not the licensee's CAP has been adequately demonstrated for the purpose of issuing NCVs shall be documented and communicated to the licensee in the PI&R inspection report(s). The determination will also be documented in the first assessment report issued following this determination. The criteria for making a determination of CAP effectiveness are:

- The licensee has established an adequate program.
- The licensee has demonstrated adequate effectiveness in identifying and documenting problems (indicated by the lack of substantial violations involving failure to identify and document adverse conditions).
- The licensee has demonstrated adequate effectiveness in correcting problems and preventing recurrence (indicated by the lack of substantial violations involving failure to take corrective action and prevent recurrence).

If a licensee's demonstrated CAP implementation degrades then it will be necessary to evaluate the extent of the degradation to determine if the enforcement process should revert to no longer issuing NCVs. This decision will be made based on the nature of identified issues that indicate a significant degradation of the licensee's CAP. The staff expects that if the identified issues are significant, then the staff will have taken escalated enforcement measures in accordance with the NRC enforcement policy for new construction. Therefore, the issuance of a Severity Level II violation against the licensee's CAP will be considered one indicator that the program has sufficiently degraded such that reverting to issuing Notices of Violations (NOVs) for all NRC identified violations is appropriate. If the decision is reached to revert to issuing NOVs then it should be communicated to the licensee as part of the assessment of licensee performance (i.e. included in the semiannual assessment letter or in a letter communicating the results of the NRC quarterly assessment review). Following the licensee's corrective actions to restore the effectiveness of their CAP the process described above to allow the NRC to issue NCVs would need to be repeated as appropriate (i.e., if the degradation was limited to implementation and not the program then the programmatic portion of the inspection need not be re-done).

06.09 Substantive Cross-Cutting Issues.

This section is under development. An NRC working group has been tasked with developing the guidance for this section with input from stakeholders. After completion of the development work this section will be revised to reflect the updated guidance.

END

EXHIBITS:

1. Construction Inspection Program
2. Construction Response Table
3. Process Activities
4. Construction Performance Review outline

Draft

Exhibit 1 - Construction Inspection Program

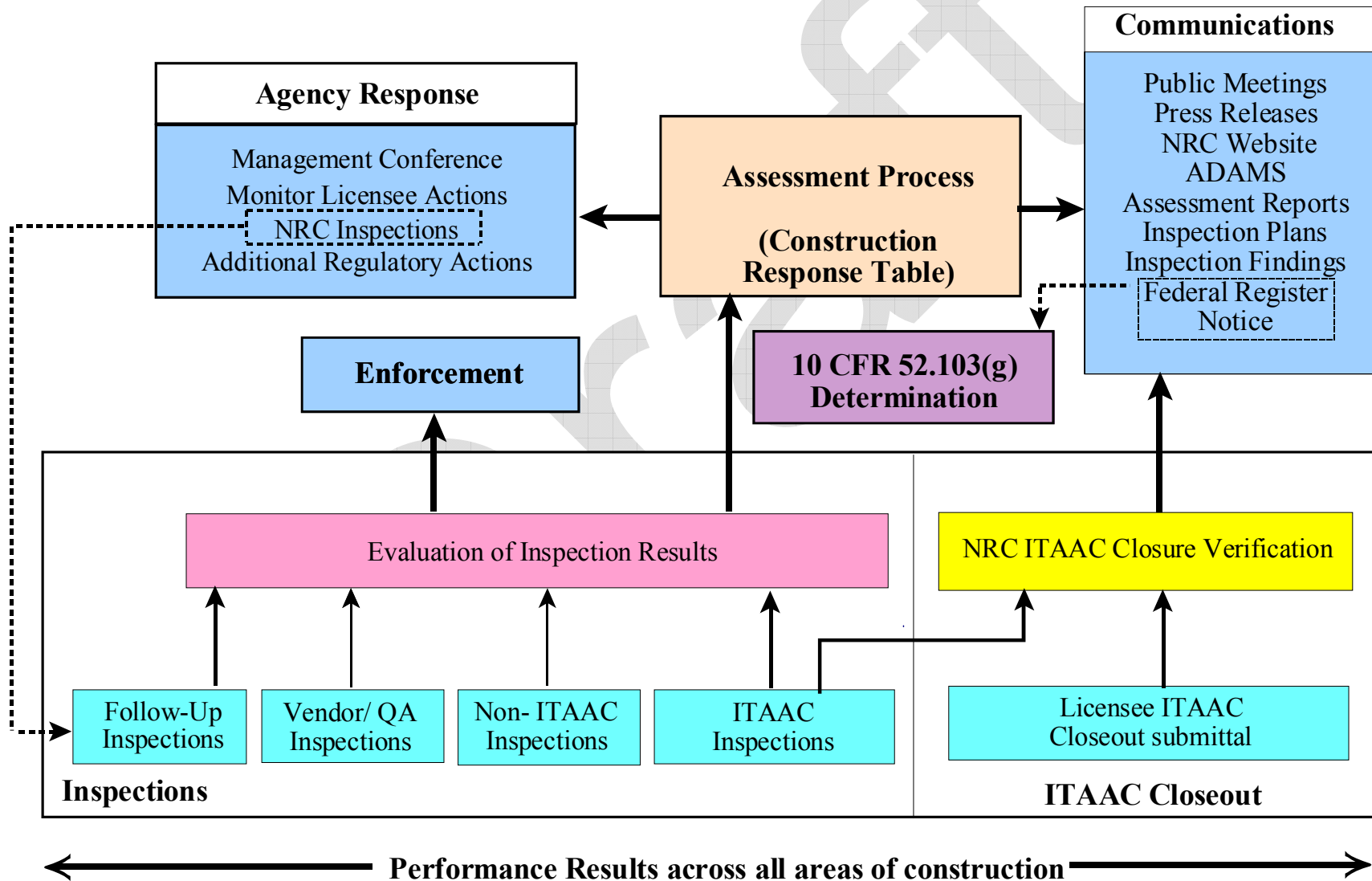


Exhibit 2 - CONSTRUCTION RESPONSE TABLE

		Baseline Program column	Increased Focus Program column	Expanded Program column	Unacceptable Performance column
RESULTS		Only SL IV violations and no substantive cross-cutting issues.	One or two SLIII violations and/or substantive cross-cutting issues.	Any combination of three SL III violations or substantive cross-cutting issues, or one SL II violation.	One SL I violation, multiple SLIII violations, or a combination of the following: 1 SL II and a total of four SL III violations/ substantive cross-cutting issues; or a total of seven SL III violations and /or substantive cross-cutting issues.
		License requirements fully met	License requirements met with some challenges to licensee	License requirements met with some significant challenges to licensee	Loss of Confidence to construct within licensing requirements in areas of concern
RESPONSE	Regulatory Performance Meeting	None	Branch Chief (BC) or Division Director (DD) Meet with Licensee	DD or Deputy Regional Administrator (DRA) or designee meet with senior licensee management	EDO or DEDO meet with senior licensee management
	Licensee Action	Licensee Corrective Action	Licensee root cause evaluation and corrective action with NRC Oversight	Licensee cumulative root cause evaluation with NRC Oversight	Licensee Performance Improvement Plan and Independent inspection with NRC Oversight.
	NRC Inspection	Baseline Inspection Program	Limited increase in NRC oversight of area(s) of concern. Expanded Inspection in accordance with IP 90001.	Expanded NRC oversight in area(s) of concern. ITAAC sample increased as appropriate. Expanded inspection in accordance with IP 90002.	Reactive team inspection in area(s) of concern. Expanded inspection in accordance with IP 90003.
	Regulatory Actions	None	Additional inspection only	Additional inspection only. Evaluate continued use of non-cited violations.	Demand for Information and/or Order. Discontinue use of non-cited violations
COMMUNICATION	Assessment Letters	BC or DD review/sign assessment report (w/ inspection plan)	DD review/sign assessment report (w/ inspection plan)	DRA review/sign assessment report (w/ inspection plan)	RA or EDO review/sign assessment report (w/ inspection plan)
	Annual Public Meeting	SRI or BC Meet with Licensee	BC or DD Meet with Licensee	DRA (or designee) Discuss Performance with Licensee	EDO (or designee) Discuss Performance with Licensee
	Commission Involvement	None	None	None	Commission Meeting with Senior Licensee Management
INCREASING SAFETY/REGULATORY SIGNIFICANCE ----->					

Exhibit 3 - Process Activities

Level of Review	Frequency/ Timing	Participants (* indicates chairperson)	Desired Outcome	Communication
Continuous	Continuous	SRI, RI, regional inspectors, SRAs	Performance awareness	None required, notify licensee by a Quarterly Assessment letter <u>only</u> if thresholds crossed
Quarterly	Once per quarter/ Four weeks after end of quarter	DCP: BC*, PE, SRI, RI	Input/verify CIPIMS data, detect early trends	Update data set, notify licensee by a Quarterly Assessment letter <u>only</u> if thresholds crossed
Semiannual Performance Review	At Semiannual Performance Review/ Six weeks after end of second quarter	DCP* and DCI DD, DCP and DCI BCs	Detect trends, plan inspections, assess plant performance, oversight, and coordinate regional actions	Semiannual Performance Review letter with an inspection plan of approximately 6 months
Performance Summary Meeting	Two weeks after the end of the Semiannual Performance Review	NRO Senior Management, DRA, Regional BCs, DCIP, other HQ offices as appropriate	Summarize results of the Semiannual Performance Review for plants in other than the CRT Baseline Program Review Column	Information to be discussed at Agency Action Review Meeting
Agency Action Review	Annually/ Several weeks after issuance of the ROP annual assessment letters	EDO*, DIR NRO, DRA, DCI/DCP DDs, DCIP, OE, OI, other HQ offices as appropriate	Review of the appropriateness of agency actions	Commission briefing