

## APPENDIX B

### ROP REALIGNMENT PROCESS

#### 1. PURPOSE

To describe how the Reactor Inspection Branch (IRIB), **Division of Inspection and Regional Support (DIRs), NRR**, will conduct its periodic review to ensure most effective overall application of inspection resources.

#### 2. BACKGROUND

**As part of the periodic** Reactor Oversight Process (ROP) self-assessment to evaluate the effectiveness of each baseline inspection procedure (IPs), **review of past inspection results, industry events and other inspection activities are conducted to determine if any changes to the IPs are warranted.** Inspection program performance metrics to verify the effectiveness of the ROP are described in detail in Appendix A of the Inspection Manual Chapter 0307, "Reactor Oversight Process Self-Assessment Program." Analysis with recommended changes to inspection procedures, if any, will be forwarded to the Regional Division Directors; **Deputy Director for Security Oversight (DSO), NSIR; Deputy Director for Preparedness and Response (DPR), NSIR; and to the Deputy Director of Division of Inspection and Regional Support, NRR** for comment. Change(s) to any inspection procedures which result from this review effort can only be made if the majority of the regions and **DIRs management (or DSO management for IPs in the security and DPR management for IPs in the emergency preparedness areas)** concur with the recommended changes.

#### 3. IMPLEMENTATION

##### a. Review Team:

The review team will consist of the following:

1. Review team leader from DIRS (team leader will be selected from IRIB or Performance Assessment Branch (IPAB))
2. Inspection Procedure Owners (**NRR/DIRS/IRIB, NRR/DIRS/IPAB, NSIR/DSO, NSIR/DPR, and Regions**)
3. Regional **or Headquarters** Division Directors or representatives, **as appropriate.**

##### b. Review Team Leader Responsibilities:

1. Develops a review schedule and coordinates the review meetings.

2. Works with **NRR/DIRS**; **NSIR/Division of Security Operations (DSO)**; **NSIR/Division of Preparedness and Response (DPR)** management and Region Division Directors to revise, if needed, the review criteria to be used for evaluating the inspection procedures.
3. Obtains concurrence from the Regions; **NRR/DIRS**; **NSIR/DSO**; **NSIR/DPR** on the review criteria to be used for the IP evaluation.
4. Ensures that inspection procedures are evaluated in accordance with the review criteria.
5. Collects evaluation results for each inspection procedure from **NRR/DIRS**; **NSIR/DSO**; **NSIR/DPR** and regional inspection procedure leads.
6. Conducts the review meetings with **NRR/DIRS**; **NSIR/DSO**; **NSIR/DPR** and regional IP leads and representatives to discuss the evaluation results and recommended changes to IPs, if any.
7. Provides summary of evaluation results and recommended changes to IPs, if any, for concurrence by **NRR/DIRS**; **NSIR/DSO**; **NSIR/DPR** management and Region Division Directors.
8. Provides evaluation results to the annual ROP Self-Assessment Paper. For example, CY 2009 evaluation results will be provided as an input to the ROP Self-Assessment Paper issued in CY 2010.
9. Ensure training for any changes are approved by the IMC-1245 management steering committee and the approved training is implemented before revised IPs are issued.
10. Ensure that the approved changes are made to the affected procedures (IPs and IMCs) before beginning of the calendar year **in which the IPs and IMCs will take affect**.

c. Inspection Procedure Owners (**NRR/DIRS**, **NSIR/DSO**, **NSIR/DPR** and Regions) Responsibilities:

1. Perform IP evaluations and propose any recommended changes (add/delete inspection requirements; increase/decrease inspection sample requirements; add or delete inspection procedure; or no change recommended) and the basis for recommending the change(s). The basis should contain the criteria (e.g., to increase the number of findings being identified in the inspected area, based on inspector feedback and other appropriate review criteria) used for making a recommendation to revise the IP.
2. Act as a lead during the review meeting with the regional representatives to discuss the results of their IP review and recommendations for change to the inspection procedure.
3. Revise and issue the inspection procedure, if required.
4. Identify and recommend training requirements for any changes made to their IPs to the review team leader.

d. Regional **or NSIR** Division Directors or Representatives:

1. Region, **NSIR/DSO** and **NSIR/DPR** Division Directors will appoint, if necessary, an IP lead to work with **NRR/DIRS** staff to perform an evaluation

of each IP using the selected criteria identified in the attachment to this appendix. **Figure 1 is also provided to help with the evaluation.**

2. DRP and DRS Division Directors or their assigned representatives shall attend the annual ROP realignment review meeting (**April/May meeting – see ROP realignment activities timeline**) coordinated by DIRS staff. **Additionally, NSIR/DSO and NSIR/DPR Division Directors or their assigned NSIR representatives shall attend the annual ROP realignment review meeting.** If a representative is sent to the meeting, he/she will be able to represent the region's viewpoint. **The purpose of the April/May meeting is to allow the IP owners to brief the various Division Directors on the reasons for the recommended changes to the inspection procedures and to allow the Directors to provide comments or ask questions on the analysis performed and conclusions reached by the IP owners.**
3. **The regions, NRR/DIRS, NSIR/DSO and NSIR/DPR will either concur, modify or reject the recommended changes to each inspection procedure during the June/July time period. The concurrence can be sent via e-mail or during a second meeting, if desired. The purpose of the second meeting would be to discuss any additional information which may aid in the decision to either accept or reject the proposed changes being made to the inspection procedures and to vote on the changes being proposed.**

e. Review Scope:

The outcome of this review is to improve the alignment of inspection resources across the inspection program to improve the inspectors' ability to identify risk significant licensee performance deficiencies. This should not result in a net increase of inspection resources to complete the baseline inspection program since addition of a new inspection requirement should be offset by a deletion of another requirement such that the overall budgeted ROP inspector resource requirement remains the same.

The IRIB/IPAB inspection procedure owner will review the past three years of inspection findings associated with his/her assigned inspection procedure and determine whether appropriate inspection resources are being applied based on the review criteria contained in the attachment to this appendix. The overall goal is to achieve the most effective application of inspection resources by directing inspectors to areas where there are potentially risk significant issues or where licensees are experiencing higher numbers of performance deficiencies.

The IP owners shall provide their analysis as described in the attachment to this appendix.

f. Review Process and Timeline:

**NRR/DIRS, NSIR/DSO and NSIR/DPR** management and regional Division Directors will approve the review criteria to be used by IP owners for their evaluation of IP

effectiveness. The review criteria can be changed to reflect current inspector and industry performance issues/concerns and past evaluations. The ROP realignment team leader will revise the attachment to this appendix to reflect the most recent review criteria and will send attachment to the IP reviewers.

The ROP realignment process will begin in **February and will review inspection findings from the most recent 3 years of inspections. NRR/DIRS, NSIR/DSO and NSIR/DPR** IP owners will work with regional IP owners or other point-of-contact to evaluate and provided recommend changes and the basis for the recommended change(s) to the IPs, if any.

The ROP realignment team leader will collect and send the IP evaluations to **all stakeholders (NRR/DIRS, NSIR/DSO, NSIR/DPR and Regional Division Directors)** in preparation for the ROP realignment meeting in **April or May** timeframe with **the regional and various headquarters Division Directors**. The purpose of this ROP realignment meeting is to discuss the review performed by **NRR/NSIR** staff and regional IP owners with **NRR/NSIR** management and Regional Division Directors.

The team leader will facilitate the meeting to discuss proposed changes to the ROP with the Division Directors. The IRIB/IPAB, regional **and NSIR** IP leads should attend the meeting to answer any questions which may be raised concerning their IPs. The regional IP leads should participate by using either the video conference system or by phone. At this meeting, the Regional **or NSIR** Division Directors or their representatives will have an opportunity to ask questions on how the analysis was performed.

After the realignment meeting **with regional and NRR/DIRS; NSIR/DSO; NSIR/DPR division directors**, the ROP realignment team leader will forward the summary of **proposed** changes agreed to during the ROP realignment meeting to the regional **and to DIRS; DSO and DPR division** directors for formal concurrence. The regions, **DIRS, DSO, and DPR management** will have a final opportunity to provide final corrections to the summary of the meeting minutes and concur on the proposed changes to the IPs **via e-mail or during a second meeting**. If majority of the regional **and headquarter** division directors agree to the changes, the **NRR/DIRS, NSIR/DSO, or NSIR/DPR** staff will make the changes to the IPs and ensure that adequate training is provided to the inspectors prior to implementation of the revised IPs in the following calendar year.

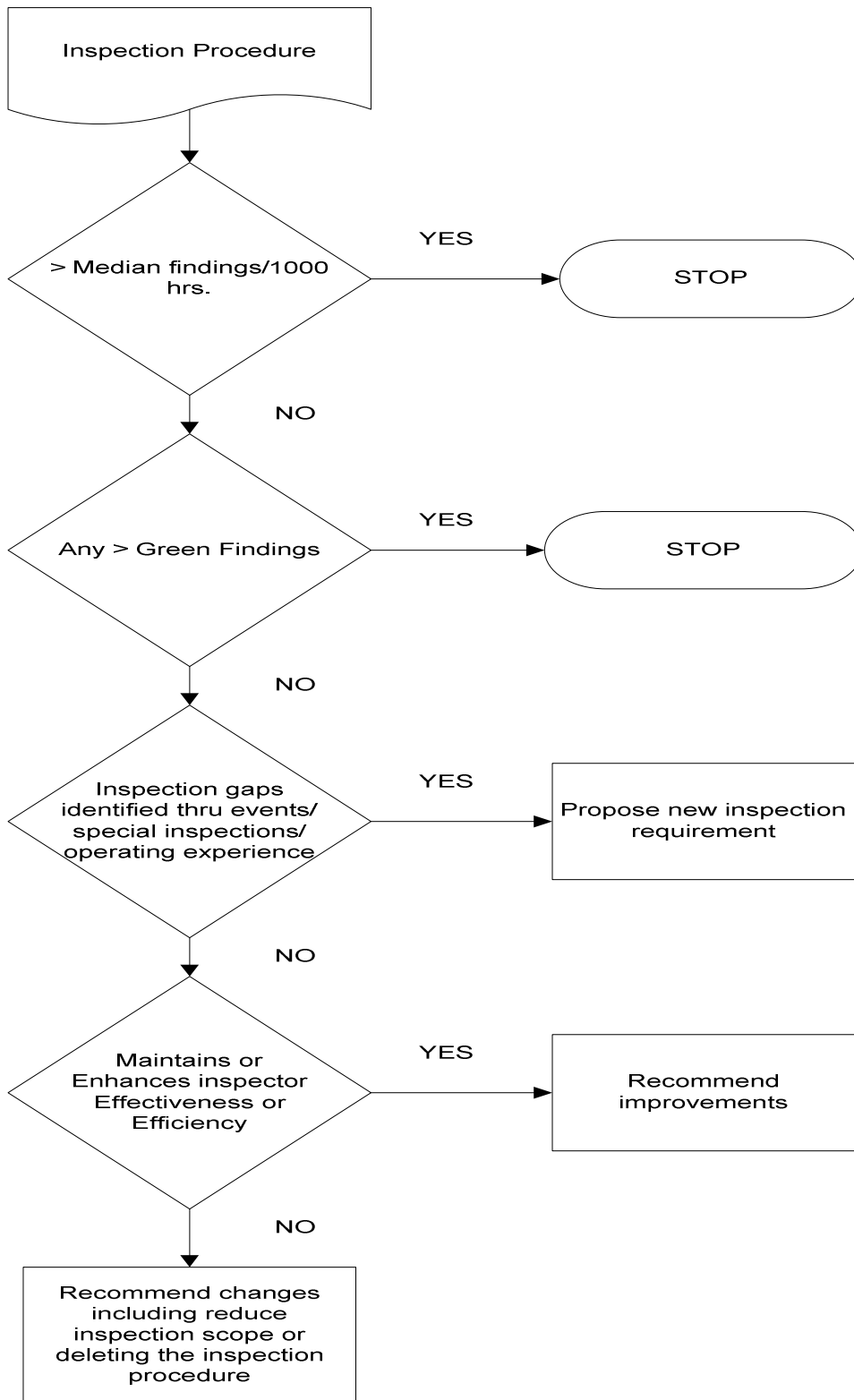
The purpose of the ROP realignment process is to appropriately allocate inspection resources within the inspection resource budget. The outcome of the review is to recommend and approve a realignment of inspection resources across the inspection program which would translate into addition or deletion of inspection requirements and increase or decrease in the number of samples. In situations where an inspection requirement or entire inspection procedure is deleted, considerations shall be given to provide, through other inspection means, a way to identify safety significant performance deficiencies which may occur in the future in the area no longer inspected. The resource evaluation required to complete the

revised inspection program will be completed as part of an independent annual inspection resource analysis performed annually by **NRR/DIRS/IPAB**.

## Inspection Procedure Review Criteria

1. Proposed recommended improvements to IPs which are at least one unit below the median ROP program value of inspection findings per 1000 hours.
2. Increase the ability of inspectors to tour and inspect the plant by recommending changes to IPs which will require more in-field inspections.
3. Develop a strategy to increase flexibility to implement the baseline program at a site based on inspector feedback and licensees past inspection performance.
4. Ensure that no inspection requirement which is intended to address past significant operating experience (NRC Bulletins and Generic Communications) is deleted from the baseline inspection program.
5. Minimize reduction of inspection effort for IPs which represents a fundamental element of ROP.
6. Develop strategies to increase inspection efficiency for IPs which inspect related inspectable areas.
7. Consider addition of inspection requirement or providing additional inspection guidance for risk significant events identified through the Operating Experience process in the past three years.

Figure 1



## Format for Inspection Procedure Evaluation

1. IP number and title
2. Statement of Procedure Objective
3. Summary of past feedback received from the regions
4. Analysis and discussion of inspection findings per 1000 hour index
5. Analysis and discussion of past special inspections and their impact, if any, on the IPs.
6. Discussion/analysis of review criteria using this attachment
7. Recommended changes (add/delete inspection requirements; increase/decrease inspection samples; add or delete inspection procedures or no change recommended)



### Timeline for ROP Alignment Activities

Activity	Month	Participants
Approve ROP Realignment Review Criteria	January/February	NRR/DIRS, NSIR/DPR, NSIR/DSO management; regional Division Directors; review team Leader
Conduct Inspection Procedure Review	February/March	Review team leader; NRR/DIRS IP owners; NSIR/DPR and NSIR/DSO IP owners; Regional IP owners
Forward the results of the IP evaluations to DIRS and regional Division Directors	March/April	Review team leader
Conduct ROP realignment meeting	April/May	NRR/DIRS, NSIR/DPR, NSIR/DSO management and staff; Regional Division Directors and NRR/DIRS, NSIR/DPR and NSIR/DSO IP owners
Forward the results from the ROP alignment meeting to DIRS management and Regional Division Directors for concurrence	May/June	Review team leader
Regions concur on the proposed changes (frequency, samples, inspection requirements, inspection hours) to the inspection program	June/July	Regional Division Directors; NRR/DIRS, NSIR/DPR, NSIR/DSO management; Review team leader.
Revise inspection procedures (IPs) and issue IPs for use	July - November	NRR/DIRS, NSIR/DPR, NSIR/DSO management and staff
Conduct training on revised IPs, if required	August - November	NRR/DIRS, NSIR/DPR, NSIR/DSO management and staff

Revision History - IMC 0307 Appendix B

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	01/25/07 CN-07-003	Initial issuance of Appendix B to IMC 0307.	NO	N/A	ML070120373
N/A	04/09/09 CN 09-011	Revisions to incorporate several recommended changes from regional Division Directors	NO	N/A	ML090640898