

April 8, 2011

MEMORANDUM TO: Fred Brown, Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Rani Franovich, Chief */RA by JLian for/*  
Performance Assessment Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: GAP ANALYSIS OF THE REACTOR OVERSIGHT PROCESS

Enclosed is the final Gap Analysis of the Reactor Oversight Process (ROP), which was performed to reveal potential areas of the ROP that may warrant additional oversight through inspection or PIs. As documented in the gap analysis, the staff identified one area of potential near-term change in the Public Radiation Safety (PRS) Cornerstone. The staff recommends changes to, or development of, ROP tools (e.g., inspection guidance, significance determination process, and performance indicators (PIs)) to address this perceived gap. The staff's recommendation has Commission policy implications that are further developed in the Calendar Year (CY) 2010 ROP self-assessment SECY paper.

As part of its ongoing efforts to improve the ROP PI Program, the staff prepared an NRC staff white paper in November 2009 (Agencywide Document Access and Management System (ADAMS) Accession Number ML093490170) that documented a comparison of international and United States nuclear industry PIs to the current ROP PI Program. The purpose of the white paper was to consider the potential applicability of candidate PIs for ROP purposes. The white paper was shared with internal and external stakeholders to initiate dialogue and solicit insights, feedback, and suggestions on the value and viability of candidate PIs.

On April 21, 2010, the NRC hosted a Category 2 public meeting to discuss a framework for considering new PIs. The initial approach focused on potential new PIs that would supplement the existing suite of indicators. The NRC and industry subsequently agreed to defer further application of resources to this endeavor until a problem statement could be defined to guide the effort in a focused and efficient manner. As such, the NRC agreed to perform a gap analysis with the goal of revealing potential areas of the ROP that warrant additional oversight through inspection or PIs.

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The staff reviewed information from a number of historical and contemporary sources and identified eleven areas for evaluation. The staff then evaluated each area for enhancement and offered one of three possible recommendations for each area: "Coverage is adequate," "Coverage could be enhanced," or "Defer." One area in the PRS Cornerstone resulted in a recommendation that coverage could be enhanced to address a perceived gap in ROP oversight activities. Two ROP Action Matrix deviations, internal feedback, industry initiatives in groundwater monitoring, and the Groundwater Task Force collectively indicate that a potential gap exists in the ROP's ability to address licensee performance in monitoring and controlling releases to groundwater. The perceived gap relates not to ensuring adequate protection of public health and safety, but rather reflects potential for improving public confidence.

To ensure that the perspectives of external stakeholders are represented and considered in the self-assessment process, the preliminary draft of the gap analysis was shared with external stakeholders at the January 20, 2011, ROP Monthly Public Meeting. The Nuclear Energy Institute provided comments (ADAMS Accession Number ML110760184), which have been incorporated into the final gap analysis to the extent practicable. The staff also considered the views of other external stakeholders and has reflected those views in this revised and final gap analysis.

Enclosure:  
As stated

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ADAMS Accession Number: ML110810078

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