NRC INSPECTION MANUAL

IPAB

Manual Chapter 0608

PERFORMANCE INDICATOR PROGRAM

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0608-01 PURPOSE

This Inspection Manual Chapter (IMC) provides guidance on the implementation of the operating Reactor Oversight Process (ROP) Performance Indicator (PI) Program. It includes guidance on the process for modifying existing PIs and for developing additional PIs for use in the oversight process.

0608-02 OBJECTIVE

02.01 To provide policy and guidance regarding implementation of the ROP PI Program, including data submission, verification, and posting of data and frequently asked questions (FAQs) on the internal and external web.

02.02 To establish a formal process for responding to questions related to interpretation of PI reporting guidance and for developing and implementing changes to the PI Program, including creating new PIs and making changes to existing PIs or thresholds.

0608-03 APPLICABILITY

This manual chapter applies to all operating commercial nuclear power reactors.

0608-04 DEFINITIONS

04.01 NEI 99-02 The PI guidance document, which is jointly produced by the NRC and the Nuclear Energy Institute (NEI), published by NEI, and entitled “Regulatory Assessment Performance Indicator Guideline.“

04.02 Feedback Form A form contained in IMC 0801, “Program Feedback,” used by NRC staff to submit a request to the Performance Assessment Branch (IPAB) of the Office of Nuclear Reactor Regulation (NRR) for clarification of the PI guidance document.

04.03 Frequently Asked Question (FAQ) A question from an external stakeholder regarding the PI Program or its implementation. All FAQs submitted to the ROP Working Group by external stakeholders will be available on the NRC's external web site and will be discussed in public meetings. The web site is periodically updated to include draft FAQs (i.e., FAQs for which the response has not yet been approved), FAQs that have been approved for use, and archived FAQs. Approved FAQs can be viewed by cornerstone/PI, posting date, or identification number.

04.04 ROP Working Group A group composed of NRC staff and licensee representatives who meet typically once every month in an open public meeting to discuss FAQs and other issues related to the ROP PI, inspection, and assessment programs.

04.05 Self-Assessment An annual report to the Commission on the Reactor Oversight Process.

04.06 Extended Shutdown For the purposes of the PI Program, a plant is considered to be in extended shutdown when the reactor has been subcritical for at least six months.

0608-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Director, Office of Nuclear Reactor Regulation (NRR)

a. Provides overall policy direction for the PI Program.

b. Directs the development and implementation of policies, programs, and procedures for the PI Program and oversight of program effectiveness and implementation.

05.02 Director, Division of Inspection and Regional Support (DIRS). Manages PI Program development and implementation within NRR and oversees program implementation and effectiveness.

05.03 Chief, Performance Assessment Branch

a. Develops policy, programs, and procedures for implementation of the PI Program.

b. Receives and posts PI data and FAQs on the internal and external web.

c. Manages and implements the process for responding to questions related to interpretation of PI reporting guidance and develops and implements changes to the PI Program, including creating new PIs and making changes to existing PIs or thresholds.

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d. Assesses PI Program effectiveness and implementation.

05.04 Regional Administrator. Manages regional implementation of the PI Program in accordance with the requirements of this IMC, Management Directive (MD) 8.13, "Reactor Oversight Process," Inspection Procedure (IP) 71151, "Performance Indicator Verification," and IP 71150, "Discrepant or Unreported Performance Indicator Data."

0608-06 BACKGROUND

06.01 Framework

The ROP is built upon a framework directly linked to the Agency's mission. That framework includes cornerstones of safety that focus on the licensee's ability to (1) limit the frequency of initiating events; (2) ensure the availability, reliability, and capability of mitigating systems; (3) ensure the integrity of the fuel cladding, the reactor coolant system, and containment; (4) ensure the adequacy of the emergency preparedness functions; (5) protect the public from exposure to radioactive material releases; (6) protect nuclear plant workers from exposure to radiation; and (7) provide assurance that the physical protection system can protect against the design-basis threat of radiological sabotage.

Within each cornerstone, a broad sample of data on which to assess licensee performance in risk-significant areas is gathered from PI data submitted by licensees and from the NRC's risk-informed baseline inspections. The PIs are not intended to provide complete coverage of every aspect of plant design and operation, but they are intended to be indicative of performance within the related cornerstone.

Data submitted by each licensee are used to calculate PI values. These values are then compared to objective thresholds to determine the performance band associated with those values. The bands are color coded. Plant data for a PI that falls within the "green" band indicates licensee performance is within the nominal, expected range. The "white" band indicates that performance is outside of the nominal, expected range and can be characterized as of low to moderate safety significance, but performance remains acceptable. Performance in the "yellow" band indicates a more significant decline in performance and can be characterized as being of substantial significance. Performance is considered acceptable, but a reduction in safety margin exists. Performance in the "red" band indicates a very significant decline in performance. Changes can be characterized as being of high safety significance. Performance may be acceptable with a significant reduction in safety margin or may be unacceptable.

06.02 Performance Indicators

PIs are a means of obtaining information related to the performance of certain key attributes in each of the cornerstone areas. They provide indication of problems that, if uncorrected, may increase the probability and/or the consequences of an off-normal

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event. Since not all aspects of licensee performance can be monitored by PIs, safety significant areas not covered by PIs will be assessed through inspection.

a. For the reactor safety strategic performance area, the objectives of the cornerstones and PIs are as follows:

1. Initiating Events - this cornerstone is intended to limit the frequency of those events that upset plant stability and challenge critical safety functions during power operations. Such events include a reactor trip due to a turbine trip, loss of feedwater, loss of off-site power, and other reactor transients. The following indicators are provided in this cornerstone:

   - Unplanned scrams (automatic and manual) per 7,000 critical hours
   - Unplanned power changes per 7,000 critical hours
   - Unplanned Scrams with Complications

2. Mitigating Systems - this cornerstone is intended to ensure the availability, reliability, and capability of systems that mitigate initiating events to prevent reactor accidents. Mitigating systems include those associated with safety injection, residual heat removal, and their support systems, such as emergency AC power. The following indicators are provided in this cornerstone:

   - Safety System Functional Failures - this PI monitors the readiness of a variety of risk significant systems to perform their safety function(s).

   - Mitigating System Performance Index - this PI is calculated separately for each of the following five systems for each reactor type:

   BWRs

   - emergency AC power systems
   - high pressure injection systems (high pressure coolant injection, high pressure core spray, or feedwater coolant injection)
   - reactor core isolation cooling and/or isolation condenser systems
   - residual heat removal systems (or the equivalent function)
   - cooling water support systems for the above systems

   PWRs

   - emergency AC power systems
   - high pressure safety injection systems
   - auxiliary feedwater systems
   - residual heat removal systems (or the equivalent function)

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- cooling water support systems for the above systems

3. Barrier Integrity - this cornerstone is intended to ensure the integrity of the physical barriers designed to protect the public from radionuclide releases caused by accidents. These barriers are the fuel cladding, reactor coolant system boundary, and containment. The following indicators are provided in this cornerstone:

   - Reactor Coolant System (RCS) Specific Activity
   - RCS Identified (or total) Leak Rate

4. Emergency Preparedness - this cornerstone is intended to ensure that actions taken in accordance with the emergency plan provide adequate protection of public health and safety during a radiological emergency. The cornerstone does not include off-site actions, which are covered by the Federal Emergency Management Agency (FEMA). The following indicators are provided in this cornerstone:

   - Drill/Exercise Performance
   - Emergency Response Organization Drill Participation
   - Alert and Notification System Reliability

b. For the radiation safety strategic performance area, the cornerstones and PIs are as follows:

1. Occupational Radiation Safety - this cornerstone is intended to ensure adequate protection of worker health and safety from exposure to radiation and radioactive materials during routine civilian nuclear reactor operations. The following indicator is provided in this cornerstone:

   - Occupational Exposure Control Effectiveness

2. Public Radiation Safety - this cornerstone is intended to ensure adequate protection of public health and safety from exposure to radiation and radioactive materials released into the public domain as a result of routine civilian nuclear reactor operations. These releases include routine gaseous and liquid radioactive effluent discharges, the inadvertent release of solid contaminated materials, and the offsite transport of radioactive materials and wastes. The following indicator is provided in this cornerstone:

   - Radiological Effluent Technical Specifications (RETS)/Offsite Dose Calculation Manual (ODCM) Radiological Effluent Occurrences

c. For the safeguards strategic performance area, the cornerstone I is as follows:

1. Security - this cornerstone is intended to provide assurance that the physical protection system can protect against the design basis threat of radiological

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sabotage. The threat could come from either external or internal sources. Although the NRC is actively overseeing the Security Cornerstone, the Commission has decided that the related performance indicator, inspection, and assessment information will not be publicly available.

0608-07 PI DATA SUBMISSION

07.01 Reporting of PI Data

Reporting of PI data to the NRC is a voluntary program in which all licensees of operating reactor plants participate. To submit PI data, licensees send a delimited text file to the NRC at pidata@nrc.gov. Hard copy submissions, in accordance with 10 CFR 50.4 "Written Communications," are not required, except in the event that the email submission is unsuccessful. Within two business days of receipt of the PI data, the NRC will send each licensee a return email to confirm and authenticate receipt of the data. Licensees have four business days from receipt of the NRC's email to report any transmission problems to the NRC.

Once the data are confirmed by the NRC, they are entered into the Reactor Programs System (RPS) database to calculate the indicator values. Within three business days after the licensee's data submittal deadline (which is twenty-one days after the end of a calendar year quarter), the NRC will post the data, the indicator values, and associated graphs on the NRC's internal web site. The regions will be notified when the PIs are available on the internal web site to allow them an opportunity to become familiar with the PIs and to identify any obvious inconsistencies prior to public release. Within 10 business days after the licensee's data submittal deadline, the NRC will place the PIs on the NRC's external web site to make them available to external stakeholders (refer to IMC 0306 "Information Technology Support for the Reactor Oversight Process" for additional information.)

07.02 PI Submission For Plants In Extended Shutdown

An operating commercial nuclear power plant with significant performance or equipment problems may be shut down for an extended period of time for a variety of reasons. Licensees may voluntarily or involuntarily shut down the plant due to significantly degraded performance, major equipment failures, or a significant plant event. In these cases, the NRC may make the decision to place the plant under the process described in IMC 0350, "Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational concerns." Plants in extended shutdown should report PIs in accordance with the guidance provided in the current version of NEI 99-02.

0608-08 PI VERIFICATION

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08.01 Because of the importance of PIs in the ROP as a source of information regarding performance upon which agency actions will be based, PI data must be reported accurately. Inspection Procedure (IP) 71151, "Performance Indicator Verification," shall be conducted to review licensees' PI data collection and reporting activities for adherence to pertinent guidance. It is expected that licensees will make reasonable, good faith efforts to comply with the guidance in NEI 99-02. This includes taking appropriate and timely action to identify and report performance issues captured by the indicators. It may be necessary for inspectors to exercise some judgment on the adequacy of licensee actions to make a reasonable, good faith effort to comply with the guidance. Discrepancies with the performance indicator data collection and reporting or with the actual data should be documented in accordance with IP 71151 and the requirements of IMC 0612, "Power Reactor Inspection Reports." Enforcement action can be taken for inaccurate PI reporting in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions."

08.02 Discrepant or Unreported PIs

In the event the NRC determines that major discrepancies exist in the PI data submitted by a licensee that causes the Agency to lose confidence in the licensee's ability to collect and report PI data accurately, the affected PI(s) will be classified as discrepant. Examples of situations in which a PI would be considered to be discrepant may include but are not limited to the following: (1) recurring errors in the reported data; (2) recurring instances of incorrect interpretations of NEI 99-02; or (3) inadequate documentation of PI data.

When PI data has been determined to be discrepant or is not being reported by the licensee, IP 71150, "Discrepant or Unreported Performance Indicator Data," will be conducted. IP 71150 provides for the performance of selected inspection activities to compensate for the discrepant or unreported PI data. Regional management should coordinate activities in this area with IPAB. The selected inspections will be performed in addition to the baseline inspection. Once the licensee has corrected the root cause(s) of the discrepant or unreported data and the NRC has verified that the licensee can collect and report PI data accurately, oversight of PI reporting in accordance with IP 71151 will resume.

When a plant has been in an extended shutdown, some PIs may not provide a meaningful indication of plant performance in the areas they are intended to monitor. In these situations, the guidance provided in IP 71150 should be followed to obtain sufficient performance information via the inspection program until the plant has restarted and sufficient PI data has been collected.

0608-09 QUESTIONS AND FEEDBACK

The NRC has received many questions and comments regarding the PIs over the years. The staff expects that changes to existing PIs and thresholds as well as development of new PIs will occur. Therefore the NRC has established a formal

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process to address questions and feedback from internal and external stakeholders, make changes to existing PIs and thresholds based on lessons learned, and develop new PIs and associated thresholds. This formal process is provided in Exhibit 1, "PI Process For Addressing Feedback and Questions." The process consists of the following five major components:

1) Input
2) Evaluation of Questions or Feedback,
3) Resolution of Questions or Feedback Not Requiring a PI Change
4) Resolution of Questions or Feedback Requiring a PI Change, and
5) Closure.

The remainder of this IMC describes the formal process. Exhibit 1 (flowchart) may be referred to at any point hereafter to gain an understanding of the four phases of the formal process. The section numbers of this IMC are included at corresponding points in the flowchart to provide easy reference to the write-up of the respective section.

09.01 Input

NRC staff, industry, or the public may raise questions or provide feedback regarding an individual PI. Questions from the NRC staff should be documented in a Feedback Form and submitted to IPAB in accordance with IMC 0801. Questions raised by industry personnel should be documented in an FAQ and submitted to an industry member of the ROP Working Group in accordance with NEI 99-02. These questions will be provided to the NRC at periodic public meetings of the ROP Working Group. Questions raised by the public or other stakeholders should be submitted via email to the Office of Public Affairs at opa@nrc.gov. Alternatively, questions from the public can be submitted in writing to the United States Nuclear Regulatory Commission, Office of Public Affairs, Washington D.C. 20555. Regardless of their origin, all questions will be addressed in accordance with the process described below.

An NRC staff member (e.g., resident inspector) with a question about a PI should first look in NEI 99-02 for guidance. If further clarification is required, he or she should search the FAQs on the NRC's external web site. The NRC staff may also provide feedback on issues related to PI guidance or implementation, including observed or perceived instances of unintended consequences. If the NRC staff and licensee do not agree on the NEI 99-02 guidance then a FAQ should be submitted in accordance with Appendix E of NEI 99-02. However, if the licensee does not intend to submit an FAQ to NEI, then the NRC staff should submit a ROP feedback form in accordance with IMC 0801 "Reactor Oversight Process Feedback Program" to solicit NRR support. The submitter should adhere to the following guidance since the feedback is in regards to an NEI document, not an internal IMC or IP for which the ROP feedback process was originally designed.

1) For the IP or IMC Number and Title block, and any additional places in the form that refer to IP or IMC, indicate "IP 71151"
2) For the Performance Indicator Flag be sure to specify which PI requires a guidance interpretation (e.g., IE04)

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3) In the Summary and/or Comments sections state that this feedback form concerns a guidance interpretation of NEI 99-02 and include specific page numbers and lines.

4)3)
Upon receipt of the feedback form, the PI lead in IPAB will perform an initial screening of the question and/or feedback. IPAB will assign a lead reviewer with assistance from the appropriate technical branch, if necessary. If NRR agrees with the regional inspector recommendations in the feedback form, the inspector should present the licensee with the staff's consensus position and ensure that the licensee will submit a FAQ to NEI in a timely manner. Similarly, NRC will acknowledge receipt of questions and feedback provided directly to the NRC from members of the public or from members of industry. This response will be in the form of written correspondence. All follow-up questions should be directed to the PI lead reviewer.

Differences in interpretation of the PI guidance between the inspector and the licensee are the only issues to be entered, via feedback form, into the PI feedback process. Issues involving technical differences should follow already established agency processes such as a task interface agreement, or a conference call with the NRR technical reviewer, the licensee, and regional staff.

09.02 Evaluation of Questions or Feedback

Issues that only require an explanation of the existing guidance will be promptly resolved. The lead reviewer will provide the originator with the explanation and the issue will be closed out in accordance with "Closure" (Section 09.05).

Questions or feedback that require modification to the guidance to clarify meaning or intent will be addressed in accordance with "Resolution of Questions and Feedback not Requiring a PI Change" (Section 09.03).

Questions or feedback in which the resolution would require a new PI or a change to an existing PI or threshold will be addressed in accordance with "Resolution of Questions and Feedback Requiring a PI Change" (Section 09.04) and subsequent steps.

09.03 Resolution of Questions or Feedback Not Requiring a PI Change

The following steps will be performed to resolve questions or feedback that do not require a PI or threshold change:

a. The ROP Working Group will review the question and develop a proposed response. DIRS staff will involve the regions and NRR technical staff when necessary in developing the response.
b. The issue will be discussed at a public meeting of the ROP Working Group to arrive at tentative approval of the question and its proposed response. Although it is desirable that tentative approval be achieved by the close of the meeting in which the issue is first discussed, this portion of the process is iterative and could

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take several working meetings. In the event NRC and its stakeholders are unable to reach alignment on the issue being discussed, the DIRS Director will make the final decision. Regardless of whether or not tentative approval is achieved by the conclusion of the meeting, NEI will enter the new FAQs into a log that contains draft FAQs and will provide a copy of the electronic file to the NRC. The NRC will make the FAQs available to the public, industry, and other stakeholders on the ROP external web page.

c. Following tentative approval, the FAQ will be held for a waiting period – normally until the next regularly scheduled meeting – to allow a final opportunity for all stakeholders to review the proposed FAQ and provide any input. Stakeholders should forward any feedback that impacts the resolution of the issue to the assigned lead reviewer for resolution prior to the next scheduled public meeting. The schedule for upcoming public meetings is posted on the public web page.

d. At the conclusion of the waiting period, the ROP Working Group will consider any additional input and will issue its final conclusion. IPAB will then place the approved FAQ on the external web page and will notify appropriate internal stakeholders of the resolution. NEI will notify licensees of the updated FAQ.

e. NEI 99-02 will be updated periodically, as appropriate, to clarify the PI reporting guidance based on insights from the resolution of the FAQs.

09.04 Resolution of Question or Feedback Requiring A PI Change

Questions or feedback that raise issues which require more than clarification of reporting guidance or policy will be addressed as described below. Resolution may involve creating a new PI, changing an existing PI, changing a threshold for an existing PI, or changing an existing PI to reflect a unique plant design features. Each of the processes share common steps, but will be discussed separately.

Developing new PIs or making changes to existing PIs or thresholds can require significant NRC resources. Prior to expending those resources, the DIRS Director will determine whether the proposed change appears to be feasible. For those changes that would clearly not be feasible, the DIRS Director will suspend consideration of the change and provide a response to the originator that includes a rationale for not proceeding. The issue will then be closed out.

If a change appears to be feasible, one of the four steps described below will be followed.

a. New PI

When an existing PI reveals some, or all, of the following indications there may be a need to develop a new PI:

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1) Proven to be ineffective,
2) Consistently generates many FAQs, or
3) Has the potential to be misleading or to create unintended consequences.

NOTE: An assessment of both the PI and inspection programs that reveals a potential safety cornerstone gap could result in the development of a new PI to ensure coverage of the key safety attribute(s). If a new PI is created to replace an existing PI, the proposed new PI should provide indication of licensee performance in the same cornerstone..

Once the need for a new PI has been determined and the scope of the information the PI will cover has been identified, the ROP Working Group will propose a definition for the PI and associated reporting criteria. To ensure that the new PI is effective for implementation in the ROP, a number of factors should be considered. Those factors should serve as a framework for evaluating the efficacy of the proposed new PI. Specifically, a proposed new PI should:

A) Be capable of being objectively measured
B) Allow for the establishment of a risk-informed threshold to guide NRC and licensee actions
C) Provide a reasonable sample of performance in the area being measured
D) Represent a valid indication of performance in the area being measured
E) Represent a verifiable (auditable) indication of performance in the area being measured
F) Encourage appropriate NRC and licensee actions
G) Provide sufficient time for the NRC and licensees to correct declining performance prior to posing undue risk to public health and safety
H) Adhere to the overall objectives of the ROP (i.e., risk-informed, objective, predictable, and understandable).

NOTE: This framework includes the considerations applied for selecting the initial set of PIs that was established in SECY 99-007 and later recorded in IMC 0308, Attachment 1.

The NRC will consider previous lessons learned and any stakeholder feedback in developing the proposed definition. The proposed PI will be discussed at a public meeting of the ROP Working Group to develop a mutually agreed upon definition. The proposed PI will be made available to internal and external stakeholders for comment via the NRC ROP web site. Following the comment period, NRC and the Industry ROP Working Group will review the comments provided and make appropriate changes to the PI as necessary.

Early consideration should be given to the potential need for OMB Clearance for the new PI to ensure clearance processing will not adversely impact final PI implementation. The OMB clearance for PI reporting, OMB No. 3150-0195, allows additional PIs to be added when necessary.

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Following the development of the final proposed PI definition and reporting guidance, the NRC must determine the efficacy of the PI. The PI must be benchmarked against past industry performance data to determine whether the results obtained from the PI would be indicative of current plant performance. If historical data are available, the ROP Working Group will collect the data to determine if the PI can identify declining performance in a timely manner so that increased regulatory attention can be applied before performance becomes unacceptable. In the event that historical data is not available, NRC and the Industry ROP Working Group will use the best information available.

If the proposed PI cannot identify declining performance in a timely manner, the PI must either be revised prior to proceeding or development efforts should be discontinued. Once the PI has been successfully benchmarked, the ROP Working Group will consider whether the PI will provide information that is not currently being collected and adds value commensurate with the reporting burden. In the event the PI does not provide information that would make its continued development and implementation beneficial, it must be revised or it will be discontinued.

The ROP Working Group will conduct a pilot test or a tabletop exercise using a representative sample of plants to collect data for the proposed PI, in addition to continuing to collect data on the existing PIs. The purpose of this pilot or tabletop exercise is to conduct a real-time test of the proposed guidance, to establish thresholds, and to determine the effectiveness of the proposed PI. When the pilot or the tabletop exercise has been completed, NRC will provide an opportunity for the industry, public, and other stakeholders to provide feedback. This feedback, along with lessons learned from the pilot, will be evaluated by the staff and may be used to modify the proposed PI and/or its thresholds, as necessary.

In conjunction with adding a PI, NRC will consider whether changes to the baseline Inspection Program are warranted to eliminate potential overlap or ensure coverage of key attributes.

After the ROP Working Group has agreed on final changes to the proposed PI and thresholds, NEI will, in collaboration with the NRC staff, revise NEI 99-02 . IPAB will update the web page as appropriate to include the new PI data. The ROP Working Group may conduct training, as deemed necessary. IPAB will issue a Regulatory Information Summary (RIS) to inform stakeholders of the new PI and its reporting criteria. The RIS will also be publically available in the Agencywide Documents Access and Management System (ADAMS) and on the public web site.. Additionally, IP 71151 will be revised to reflect the new PI.

b. Substantive <u>Changes To An Existing PI</u>

The process for making a significant change to an existing PI is similar to creating a new PI. Like the initial steps in creating a new PI, NRC must ensure that the revised PI will provide an indication of licensee performance in the key attributes of the cornerstone for which the existing PI was intended. The ROP Working

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Group will conduct public meetings with all stakeholders to discuss and reach agreement on the proposed change, including the PI definition and reporting criteria. The proposed change will be made available to internal and external stakeholders for comment via the NRC ROP web site. Following the comment period, NRC and NEI will review comments provided and make changes to the PI as appropriate. This process is iterative and allows all stakeholders an opportunity to contribute to the process.

If the proposed change is approved, the NRC and NEI will identify a representative sample of plants that are willing to pilot test the proposed change by collecting data for the modified PIs while continuing to provide data on the existing PIs. The purpose of a pilot program is to conduct a real-time test of the proposed guidance, validate the thresholds, and ensure the effectiveness of the PI. When the pilot has been completed, NRC will provide an opportunity for the industry, public, and other stakeholders to provide feedback. This feedback, along with lessons learned from the pilot, may be used to modify the proposed PI as appropriate.

After the ROP Working Group has agreed on final changes to the PI, NEI will revise NEI 99-02 accordingly and IPAB will update the web page as appropriate to reflect the changes. The ROP Working Group may conduct training as deemed necessary. IPAB will issue a RIS to inform stakeholders of the PI change and approve the use of the new PI. The RIS will be publically available in ADAMS and on the public web site. Additionally, IP 71151 will be revised to reflect the new PI.

c. Change In Threshold(s)

Thresholds may need to be adjusted based on lessons learned from experience with individual PIs. Such adjustments are not intended to continually raise licensee performance expectations, but rather they are intended to ensure that the initial thresholds, some of which were established without the benefit of actual industry performance data, are performing as intended.

Once the need for a threshold change has been identified, the NRC and Industry ROP Working Group will meet in a public forum to discuss and reach agreement on the proposed threshold change. The establishment of a threshold should be consistent with the approach used in SECY 99-007, if practicable. The proposed change will be made available to internal and external stakeholders for comment via the NRC ROP web site. Following the comment period, the ROP Working Group will review the comments in a public meeting. If the Working Group is unable to reach agreement on a new threshold, the issue will be elevated to higher levels of NRC management to make the final decision.

IPAB will issue a RIS to inform stakeholders of the threshold change and will modify the web page accordingly. The RIS will provide guidance on when the revised threshold will become effective. Additionally, the RIS will be publically available in ADAMS and on the public web site.

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d. Unique PI

With multiple reactor designs, plants may have unique design features that make compliance with the data reporting criteria established in NEI 99-02 impossible, impractical, or ineffective.

In such cases, the ROP Working Group will form a sub-group that includes representatives of the affected licensees to develop unique criteria to accommodate plant-type differences. If historical data are available, it will be collected and used in this effort. When historical data are unavailable, an expert panel will be assembled to identify appropriate thresholds based on experience. The NRC will then follow the remainder of the guidance outlined in Section C, Change In Threshold(s), to complete this process.

09.05 Closure. Once an issue has been resolved the originator of the question or feedback will receive a response in a timely manner. If the question or feedback was generated by a NRC feedback form, the lead reviewer will notify the originator of the final response in accordance with the guidance established in IMC 0801. If the question or feedback was generated by an FAQ, the ROP Working Group will adhere to the guidance in NEI 99-02, Appendix E, for documenting and posting the final resolution. If the question or feedback was generated by a public stakeholder the NRC will respond in written correspondence.

If a licensee disagrees with the resolution documented on a feedback form, the licensee should submit an FAQ to the ROP Working Group to present at the next ROP Working Group meeting. The FAQ process discussed in sections 9.01 and 9.03 and outlined in Appendix E of NEI 99-02 will be followed.

0608-10 PI REFERENCES

Management Directive 8.13, "Reactor Oversight Process"

SECY-99-007, "Recommendations For Reactor Oversight Process Improvements"

SECY-99-007A, "Recommendations for Reactor Oversight Process Improvements (Follow-up to SECY-99-007)"
SECY-00-049, "Results of the Revised Reactor Oversight Process Pilot Program"

Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review"

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Inspection Procedure 71151, “Performance Indicator Verification”

Inspection Procedure 71150, “Discrepant or Unreported Performance Indicator Data”

NEI 99-02, “Regulatory Assessment Performance Indicator Guideline,” (Current Revision)

Regulatory Information Summary 99-06, “Voluntary Submission Of Performance Indicator Data” (collecting and reporting historical data)

Regulatory Information Summary 2000-08, “Voluntary Submission Of Performance Indicator Data” (collecting and reporting data reflecting plant performance during full implementation of revised reactor oversight process)

General Statement of Policy and Procedure for NRC Enforcement Actions

Manual Chapter 0350, “Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational Concerns”

Public web site for access to FAQs:
http://www.nrc.gov/reactors/operating/oversight/program-documents.html#pi

Internal ROP web site: http://nrr10.nrc.gov/rop-digital-city/index.html

External ROP web site: http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html

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PERFORMANCE INDICATORS
Process for Addressing Questions and Feedback

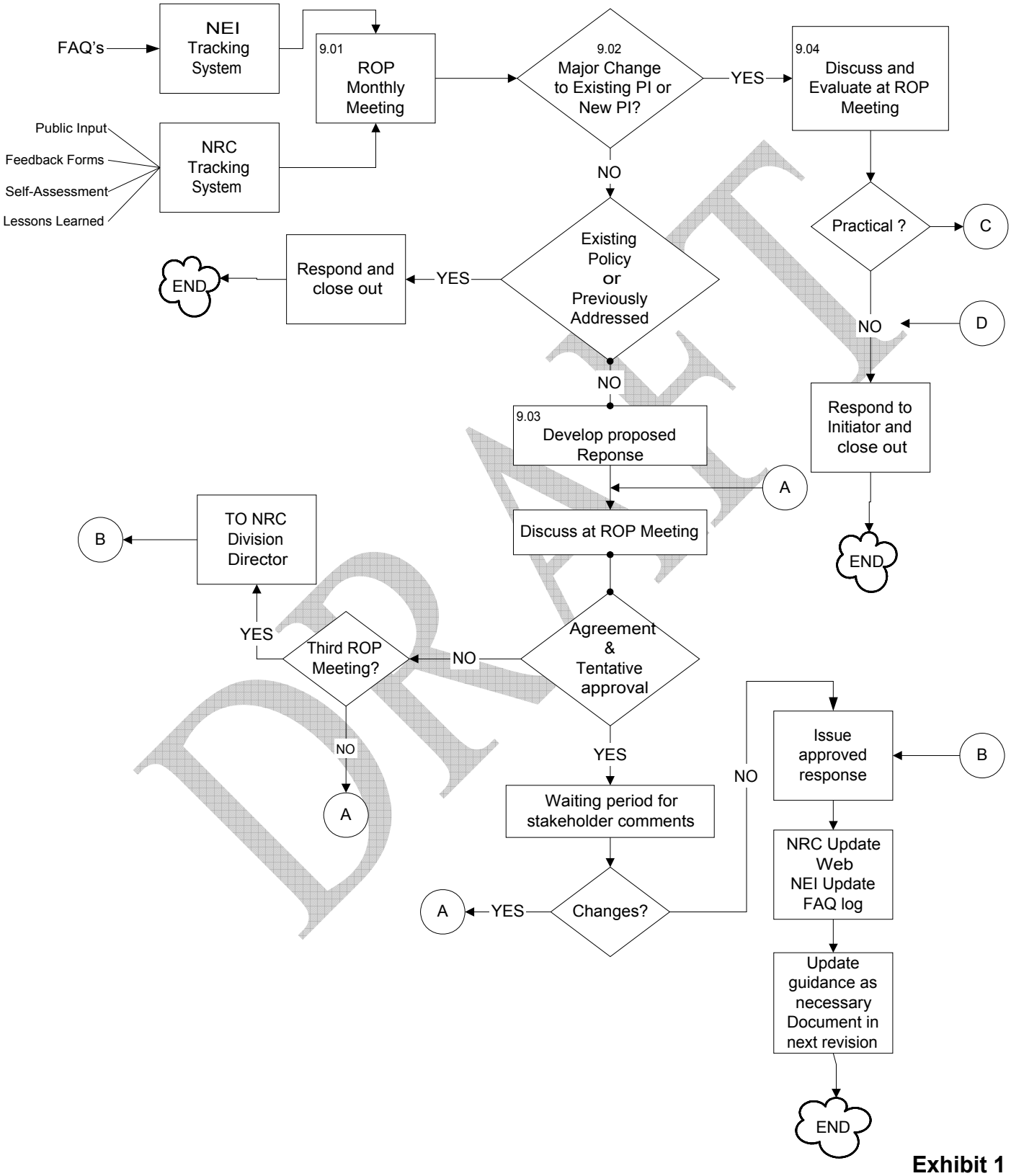

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Exhibit 1
Part 1

PERFORMANCE INDICATORS
Process for Addressing Questions and Feedback (Continued)

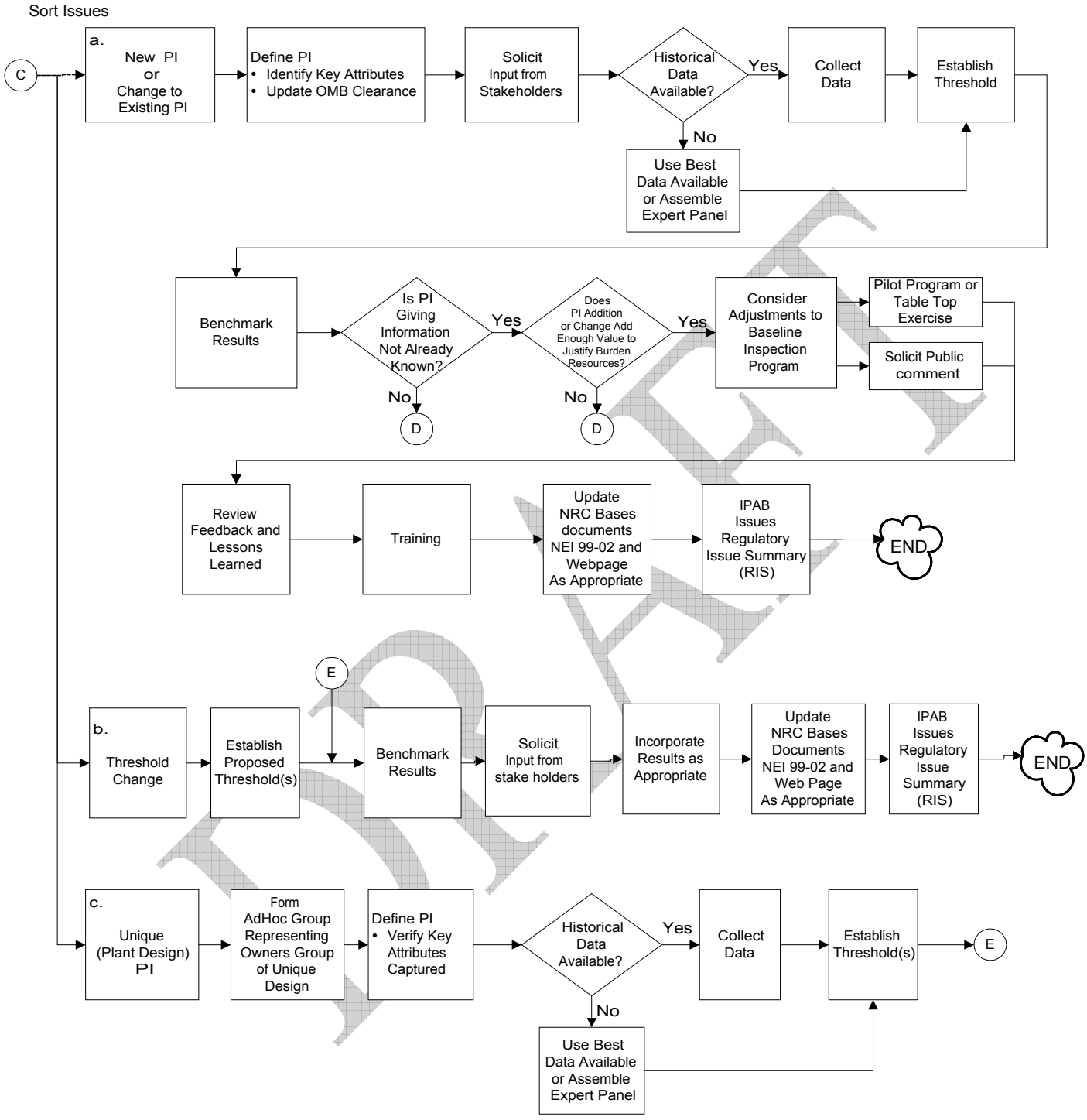

Exhibit 1 - Continued
Part 2

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ATTACHMENT 1

Revision History for IMC 0608

Commitment Tracking Number	Issue Date	Description of Change	Training Required	Training Completion Date	Comment Resolution Accession Number
N/A	02/27/07 CN 07-007	IMC0608 Delete SSU, add MSPI; update flow charts; add definitions	None	N/A	N/A
N/A	XX/XX/XX	Clarified guidance on the ROP feedback form process and its relationship to the PI Program, added additional guidance on a framework to consider in developing new PIs, and various editorial corrections and minor updates.	None	N/A	

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