

Integrated Regulatory Review Service Mission to the United States

MODULE 4: MANAGEMENT SYSTEMS FOR REGULATORY BODY

Overview

The International Atomic Energy Agency (IAEA) safety requirements of GS-R-3, “Documentation of the Management System,” identify criteria for establishing, implementing, assessing, and continually improving a management system that integrates safety, health, environmental, security, quality, and economic elements. These requirements apply to management systems for industrial nuclear facilities and activities, as well as those for entities engaged in regulating such facilities and activities, such as the U.S. Nuclear Regulatory Commission (NRC). Therefore, the NRC used GS-R-3 criteria to perform a self-assessment of the agency’s management systems, in anticipation of the upcoming Integrated Regulatory Review Service (IRRS) mission, scheduled for October 2010.

The NRC compared favorably with the GS-R-3 requirements in most areas. However, one area for improvement should be highlighted. As an outcome of its self-assessment, the NRC identified that it does not have an overarching document describing the many complex components of the agency’s management system, as required in Sections 2.8, 2.9, and 2.10 of GS-R-3. In response, the NRC is developing a comprehensive management systems document, with the expectation that it will be modified to incorporate other outcomes of the IRRS mission before it is finalized and formally published as a guideline for all NRC staff.

The following sections describe the results of the NRC review for each high-level area of interest within GS-R-3.

The Management System of the Regulatory Body

The regulatory body shall establish, implement, and assess and improve a management system that is aligned with its safety goals and contributes to their achievement. (GS-R-1, Requirement 19)

NRC management has demonstrated its commitment to, and has established, appropriate management controls, feedback loops, and well-established values that demonstrate the agency’s commitment to establishing, maintaining, and improving the agency’s management system. The NRC is headed by five Commissioners, collectively referred to as the Commission, who formulate policies and regulations governing nuclear reactor and materials safety and security. The Commission conducts its business in a public forum and encourages input from its stakeholders, thereby reinforcing its belief that nuclear regulation is the public’s business, and it must be transacted publicly and candidly.

Management at all levels demonstrates a commitment to the establishment, implementation, assessment and continual improvement of the management system through the activities described below.

Strategic Planning

The NRC's Strategic Plan describes how the agency intends to accomplish its mission and establishes the Commission's strategic direction by defining the vision, goals, and outcomes it intends to pursue. In particular, the Strategic Plan focuses on the goals of safety and security and strategies for organizational excellence, including openness, effectiveness, and operational excellence. Together, these goals support the agency's ability to maintain the public health, safety, and trust. Success in achieving each goal and strategy in the Strategic Plan is gauged primarily through performance measures that have been developed for the agency's annual "Performance Budget" and is reported in the annual "Performance and Accountability Report."

Performance Budget

Each year, the NRC publishes its "Performance Budget" (NUREG-1100), which describes the agency's programs in the performance plan, the budget estimates for these program activities, and the distribution of the budget by major program area. The performance plan also includes goals and measures that gauge the agency's success in accomplishing its mission.

Performance and Accountability Report

For each fiscal year, the NRC evaluates its own performance against the previous year's "Performance Budget" (NUREG-1100). The "Performance and Accountability Report" (NUREG-1542) presents a comprehensive and integrated picture of the agency's performance for a specific fiscal year. This report includes the following:

- the NRC's audited financial statements
- the results of an evaluation of management controls
- a report on the agency's success in achieving its strategic and performance goals
- the results of any significant assessments of program activities that were carried out during
- the reporting period the NRC Inspector General's discussion of the most serious management challenges facing the agency and how the NRC is addressing them

Corporate Values and Ethics

These NRC values guide the NRC staff and activities:

- Integrity...in our working relationships, practices and decisions...trustworthy, reliable, ethical, unbiased
- Service...to the public, and others who are affected by our work...responsive, accountable, proactive
- Openness...in communications and decision-making...transparent, forthright

- Commitment...to public health and safety, security and the environment...dedicated, diligent, vigilant
- Cooperation...in the planning, management, and performance of agency work...helpful, sharing, team-oriented, engaged
- Excellence...in our individual and collective actions...high quality, continuously improving, self-aware
- Respect...for individuals' diversity, roles, beliefs, viewpoints, and work-life balance...professional, courteous, objective, compassionate

Safety Culture

The NRC encourages a strong safety culture through the development and reinforcement of positive safety attitudes and behaviors in individuals and teams supporting the agency's mission. The NRC holds its employees to a high standard of involvement and responsibility for the decisions that are made. The agency expects employees to promptly speak up, listen to differing views fairly, and treat each other with respect. The NRC strives to establish and maintain an open, collaborative work environment that encourages all employees and contractors to promptly voice differing views without fear of retaliation. The NRC encourages trust, respect, and open communication to foster and promote a positive work environment that maximizes the potential of all individuals and improves the agency's regulatory decisionmaking. Alternative viewpoints are welcomed, valued, and considered.

Management Roles, Responsibilities, and Activity Planning

The NRC's Commission consists of five members nominated by the President and confirmed by the U.S. Senate for a 5-year term. The President designates one member to serve as Chairman, principal executive officer, and spokesperson of the Commission. The members' terms are staggered so that one Commissioner's term expires on June 30 every year. No more than three Commissioners can belong to the same political party.

The Commission as a whole formulates policies and regulations governing nuclear reactor and materials safety, issues orders to licensees, and adjudicates legal matters brought before it.

The Executive Director for Operations carries out the policies and decisions of the Commission and directs the activities of the various program and regional offices. Among the program offices, the Office of Nuclear Reactor Regulation (NRR) is the lead office responsible for regulating all licensing activities and overseeing all inspection activities associated with the operation of both nuclear power reactors and research and test reactors. The management directive (MD) system is a comprehensive set of documents that outlines the NRC's basic policies and standards; Volume 9, "NRC Organization and Functions," presents the NRC's organizational structure and assigns responsibility to organizational components. More specifically, MD 9.27, "Organization and Functions, Office of Nuclear Reactor Regulation (NRR)," details the management responsibilities for the Director of NRR and assigns him or her the responsibility for supervising, directing, coordinating, and approving the activities of the various organizational units within the office.

In support of the NRC's Strategic Plan and annual budget allocations from Congress, and with direction from the Commission, senior managers plan and implement regulatory work activities through office-specific operating plans. These plans are then sent to the Office of the Executive Director for Operations for approval. The budget, service-level agreements, and operating plans are based on the defined roles and responsibilities of the various parts of the organization. For example, the NRR operating plan includes a summary of NRR programs, projects, activities, and other items to be measured throughout the year and the metrics that will be used to monitor them. These measures are integrated into the performance plans for the senior managers responsible for achieving the desired outcomes.

NRC Management System's Scope and Documentation

The NRC's management system comprises multiple interrelated and interacting programs and processes. The management system supports the NRC's regulatory mandate and structure and integrates the programs and processes of major activities with programs and process in three support areas. Five major activity areas are (1) regulations and guidance, (2) licensing, decommissioning, and certification, (3) oversight, (4) operational experience, and (5) support for decisions. Support areas are regulatory support, corporate support, and human capital.

The NRC's management system is implemented through a series of guidance documents. Those documents fall into one of five levels. Each level represents documents with equivalent levels of authority and similar intended audiences.

1. Documents at the highest level are Commission-level policies and papers.
2. The second level addresses general, high-level policy implementation. At the center of policy implementation are the MDs. Directives specify policy, objectives, responsibilities, authorities, and other requirements in specific functional areas. They are formal issuances that guide, inform, and instruct NRC employees in the performance of their jobs and communicate policies to enable employees to work effectively within the agency, with other agencies, and with the public. Directives have associated handbooks, which contain instructional material consisting of procedures, guides, standards, reporting requirements, exhibits, and identification of pertinent laws that require compliance with the policy stated in the directives.
3. Third level documents contain agency-level guidance for activities spanning multiple agency offices.
4. Fourth level documents are office-specific implementation guidance that contains extensive detail that applies internally to a particular NRC organization. Within each major office of the NRC, a series of documents (e.g., office instructions) provides guidance on administrative activities, budget formulation, communication with other offices, and guidance on performing licensing or other regulatory activities that are assigned to that office. In addition to providing guidance for the specified activity, each guidance document typically highlights special responsibilities or authorities required of or by the managers and staff for that activity. Each series of guidance documents also includes directions for the control and approval of changes to the information contained in any document in the series.
5. Fifth level documents contain more detailed task-specific user guidance for implementation of activities in the various divisions. Documents in this level fall into two

categories: administrative and technical. Administrative guidance documents direct the staff in the performance of some day-to-day tasks.

Included in this category are templates for producing routine documents, as well as instructions on how to disseminate general, time-sensitive information. Technical guidance documents will normally vary by work unit. Technical guidance documents normally provide more detailed information used by only part of the organization. These documents can identify interactions with other processes, inputs, process flow, and process outputs.

Controlling Documents and Records

To manage the guidance documents described above, as well as all of the NRC's business documents, the agency established a document control system that is the official repository for all official agency records. This system, the Agencywide Documents Access and Management System (ADAMS), is available to all NRC staff as part of the desktop infrastructure. ADAMS has easy search capabilities, because documents residing in ADAMS are profiled to be retrievable according to attributes such as the document date, the author's name and affiliation, the date of availability in ADAMS, the document type (according to a structured list of choices), document title, and document text. Additionally, logical operators such as "greater than" and "less than" allow the staff to search by value ranges.

As required for all Federal agencies, it is NRC policy that all official records made or received by the agency in the course of its official business comply with the regulations governing Federal records management issued by the National Archives and Records Administration and the General Services Administration.

All internally and externally generated records and documents are processed, maintained, distributed, made available to the public, and preserved or destroyed, as appropriate. ADAMS maintains appropriate NRC unclassified, non-Safeguards, official program-related records in a centralized electronic records repository. The NRC's publicly available documents are made available to the public via the agency's external Web site and the ADAMS public libraries. In addition to ADAMS, the NRC maintains hard-copy and electronic record and document-handling systems necessary to meet the needs of the agency. All NRC systems, including ADAMS, are designed to meet National Archives and Records Administration regulations.

External Communication

ADAMS is also used for external communications. It is mandatory for NRC staff to add documents to ADAMS and use the system to declare documents as official agency records. These records can be made available to the public at various times, depending on the need. In general practice, an NRC-generated document is made available to the public through ADAMS, if it is marked as publicly available, on the sixth working day after the date of the document.

While ADAMS is the official recordkeeping system, the NRC uses other information technology infrastructure to give stakeholders access to information. Access to information is organized and highlighted on the NRC internal and external Web sites. The Web provides information to stakeholders by supporting the offices in providing the agency's most current information through the public Web site. The upcoming Web site redesign will assist the public stakeholders by increasing the ease of finding information through user-centered research. The redesign will incorporate improved navigation and a one-stop Google search for the Web site,

as well as publicly available ADAMS documents. Also, NRR uses list servers to ensure that interested stakeholders receive electronic copies or notification of availability of information related to a specific topic. The Web site is also a notification system for meetings and conferences.

For internal communications, NRR has an internal Web site that includes links to all necessary policy and guidance documents, has community-of-practice sites that allow for sharing of safety and technical information, and SharePoint® sites to facilitate communications and document development.

Managing Information and Knowledge as a Resource

The NRC relies heavily on information technology tools and services to communicate with staff. Almost all documents that govern agency policy or procedures or are necessary for staff to perform their jobs are available to staff through the NRC's internal Web site and ADAMS (described above), or through SharePoint portals. These tools are especially helpful for documents that are considered a "work-in-progress" or that require a consensus. In addition, for time-sensitive notifications, the NRC maintains current communication with staff via e-mail and inclusion of information on the internal Web site. The NRC also uses its external Web site to communicate with external stakeholders. The external Web site contains almost all applicable guidance for licensees and also serves as a notification system for meetings and conferences.

The NRC staff represents the NRC's most vital resource, and the NRC cultivates leadership skills, excellence, results, and accountability through its development and performance management programs. The agency assesses organizational and individual results and leadership effectiveness through a variety of tools and processes.

The NRC has an integrated and comprehensive program, referred to as the Leaders Academy, for training and developing leaders at all levels in order to emphasize NRC values (e.g., the staff's and agency's adherence to the values and principles of good regulation) and important leadership skills (e.g., coaching and rewarding staff, managing subordinates' performance, fostering diversity, developing teams). Individuals compete for and are carefully selected for leadership positions at each level based on their skills, and the agency is committed to continually developing the skills needed at each level of leadership.

The agency has included specific programs and activities to support knowledge retention and management. All NRR employees receive training through formal qualification programs. The NRC has launched a knowledge management (KM) program to support more effective approaches to knowledge collection, transfer, and use. A few recent initiatives include upgrading the Knowledge Management Center; continuing to populate the Expertise Exchange; videotaping subject matter experts and building the agency's KM Subject Matter Expertise Library; and pursuing other information technology initiatives to streamline workforce planning, expert location, and qualifications tracking. NRR Office Instruction ADM-506, "Knowledge

Management Process," defines the KM process for NRR. The process assists supervisors and employees in identifying the important information that should be captured, stored, and transferred to employees. The process also assists in identifying potential methods for capturing and transferring knowledge. Handbooks, desk references, seminars, video interviews, and training manuals are all examples of methods for knowledge capture and transfer.

Management Self-Assessments and Independent Assessments on Behalf of Senior Management

Self-assessments and independent assessments on behalf of senior management can occur in various ways and are divided into two types of assessments: those related to organizational efficiency and effectiveness and those that address personnel practices and procedures.

Assessments of Organizational Efficiency and Effectiveness

The U.S. Government Accountability Office (GAO), a nonpartisan agency that works for Congress, performs independent audits. GAO advises Congress and the heads of executive agencies about ways to make Government more effective, efficient, ethical, equitable, and responsive. Another external entity is the U.S. Office of Management and Budget (OMB), which requires agencies, including the NRC, to perform self-assessments using the OMB methodology, known as the Program Assessment Rating Tool (PART). OMB reviews the results of these assessments and uses the results in its review of the agency's budget request. Within the NRC, an independent and objective unit, the Office of the Inspector General (OIG), conducts and supervises audits and investigations relating to the NRC's programs and operations. Additionally, the Federal Financial Integrity Act of 1982 requires a self-assessment, and the Chairman of the NRC annually certifies, with reasonable assurance, that the NRC meets the objectives of (1) efficient/effective operations, (2) reliable financial reporting, and (3) compliance with laws and regulations.

Assessments of Personnel Practices and Procedures

The NRC formally evaluates the design and implementation of its performance management systems for NRC staff on a regular basis through assessment tools developed and reviewed by the U.S. Office of Personnel Management, the Federal agency responsible for advising the President on the U.S. Civil Service. The Senior Executive Service appraisal system is evaluated through submission of detailed performance plan information; and the NRC regularly evaluates and documents leadership indicators and initiates efforts to further improve leadership and performance requests for certification to the U.S. Office of Personnel Management. The appraisal systems for other NRC staff are evaluated through the Performance Appraisal Assessment Tool. In determining whether to grant certification, the U.S. Office of Personnel Management reviews, among other things, governance and oversight within the agency; whether the system is results-oriented, holds executives and their subordinates accountable, and is based on balanced measures; and the extent to which the system makes meaningful distinctions in performance level, pay, and bonuses based on individual and organizational performance. The agency has received full certification from the U.S. Office of Personnel Management for its Senior Executive Service appraisal system.

In addition to reviewing organizational results and individual performance and developing staff, the NRC regularly administers staff surveys to obtain feedback about employee perceptions, including perceptions of leadership, alignment with mission, cooperation within and between organizations, performance evaluation, recognition, training and development, and communications and information sharing. Surveys regularly administered include Human Capital Surveys administered by the U.S. Office of Personnel Management and Safety Culture and Climate Surveys administered through the NRC's OIG. The NRC typically scores well. For example, the NRC has been rated the best place to work in the Federal Government as a result of the last two Federal Human Capital Surveys and also showed substantial improvement in

most areas from one survey to the next. Results from the last OIG survey also showed improvements. The agency pays close attention to survey feedback, follows up with focus groups and working groups, and acts on opportunities to improve (such as additional communications initiatives).

Promotion and Support of a Strong Safety Culture

Since its establishment in 1974, the NRC has emphasized safety culture promotion and continuous improvement, both externally (for those the agency regulates) and internally (for the agency itself).

External Safety Culture

As part of the NRC's integrative approach, the emphasis on continuously improving the safety culture of the agency over many years has evolved from the earlier concept of quality management. The NRC's efforts to formally promote safety culture date back to the 1989 issuance of a policy statement on conduct of operations. The focus was broadened and a new policy was issued in 1996, which addressed the concept of a safety-conscious work environment. In 2008, the NRC initiated an effort to expand the Commission's policy of safety culture to address the unique aspects of security and to ensure that the resulting policy would be applicable to all licensees and certificate holders. In doing so, the NRC reviewed a range of domestic and international information, considered lessons learned, and obtained input from a wide variety of stakeholders.

Based on these activities, in May 2009, the staff presented a draft safety culture policy statement to the Commission and received approval to again engage stakeholders by requesting public comment through publication in the *Federal Register*. During the public comment period, the NRC worked with stakeholders through a public workshop, which was aimed at refining the definition of safety culture and identifying related traits. After reviewing and resolving the various comments, the staff will attempt to validate the safety culture traits before developing a final policy statement for Commission consideration. The final policy is scheduled to be sent to the Commission in early 2011. Once the statement is final, the NRC will review and revise, as necessary, its programs and processes for the oversight of licensees with respect to the expectations in the policy statement. Licensees and certificate holders will be expected to (1) consider the extent to which the traits are present in their organizations and among individuals who are overseeing or performing regulated activities and (2) take the steps necessary to foster a positive safety culture commensurate with the safety and security significance of activities and the nature and complexity of their organization and functions.

Internal Safety Culture

To strive for continuous improvement, the agency formed the Internal Safety Culture Task Force to review internal safety culture activities against expectations for external safety culture activities. From October 2008 to May 2009, the task force conducted a series of data collection activities, including focus groups, interviews, benchmarking, and communications and outreach. Overall, the task force found that NRC employees support the agency's mission and feel pride in their jobs and that the agency has many processes and practices that support a strong safety culture. In focusing on areas for enhancement, the task force made a set of recommendations for continuous improvement. The NRC has begun implementing all the task force recommendations. In addition, the agency has developed, and continues to update,

agencywide and office-specific action plans in response to the latest OIG Safety Culture and Climate Survey results (as discussed above in the section “Assessments of Personnel Practices and Procedures”). Once the safety culture policy statement is final, the agency will evaluate its internal safety culture activities and initiatives to ensure alignment with the expectations in the policy statement.

Open Collaborative Work Environment and Opportunities to Express Differing Views

To promote a strong safety culture, the NRC recognizes the need to establish and maintain an open, collaborative work environment that encourages all employees and contractors to promptly voice differing views without fear of retaliation. The NRC holds its employees to a high standard of involvement and responsibility for the decisions that are made. As such, alternative viewpoints are welcomed, valued, and considered.

The NRC encourages trust, respect, and open communication to foster and promote a positive work environment that maximizes the potential of all individuals and improves the agency’s regulatory decisionmaking.

Most differences in opinion are resolved through informal discussions with coworkers and supervisors, which lead either to a modification in the agency’s position or a resolution of the employee’s concern without the need for further action. The NRC has several processes available to individuals for expressing and having their mission-related differing views heard by decisionmakers. For example, the NRC has an *open door policy* that supports and allows any employee to initiate a meeting with an NRC manager or supervisor, including a Commissioner or the Chairman of the NRC, to discuss any matter of concern to the employee. An employee may request an open door meeting directly with the selected manager or supervisor without the approval of the intermediate management. In using the *nonconcurrency process*, employees may choose not to concur on any part of a document with which he or she has disagreed. In addition, employees are permitted to document their concerns and attach them to proposed staff positions or other documents to be forwarded with the position as it moves through the management approval chain by using the nonconcurrency process. The *Differing Professional Opinions Program* is a formal process that allows all employees and contractors to have their differing views on established, mission-related issues considered by the highest level managers in their organizations (i.e., Office Directors and Regional Administrators). The process also provides managers with an independent, three-person review of the issue (with one person chosen by the employee). After a decision is issued to the employee, he or she may appeal the decision to the Executive Director for Operations (or the Chairman for those offices reporting to the Commission).

Consideration of Stakeholders’ Expectations

The NRC has various levels of stakeholders to whom it regularly reports its work plans and accomplishments. Each stakeholder represents a different level of oversight and accountability, yet each level maintains a consistency and transparency that ensures that the NRC achieves the goals and objects identified. There is the “contract” between the NRC and the U.S. Congress that provides the funding necessary for the NRC to perform the regulatory tasks

required for implementation of its “contract” with another group of stakeholders, the licensees. There is also a “contract” with the public, whose safety and security is the NRC’s paramount concern, and with whom the NRC strives to be open in all regulatory activities.

The NRC's "contract" with Congress is developed through the agency's Planning, Budgeting, and Performance Management (PBPM) Process, which has four distinct phases of activity:

1. budget formulation
2. congressional action
3. budget execution
4. audit, review, and performance reporting

The PBPM process is ongoing, and all activities are tied to the outcomes identified in the President's budget presented to Congress. These outcomes are the distinct, measurable activities that the NRC plans to accomplish each year, in support of the agency's Strategic Plan. For example, the fiscal year 2010 "Performance Budget" uses the Strategic Plan structure to align resources and to show a clear link between the programs and the agency's goals.

Commitment to Openness with Stakeholders

In interactions with public stakeholders, the NRC strives for open communications and encourages public involvement through activities identified in the recently drafted Open Government Plan, which responds to the Obama White House Open Government Initiative. The agency's commitment to openness is also evident in other legally mandated public requirements, such as the Administrative Procedure Act for rulemaking activities; DLOP 228, Procedures for Processing License Amendments for Power Reactors and Testing Facilities—No Significant Hazards Consideration; Noticing and State Consultation; and opportunities for the public to participate in hearings and environmental assessments and to petition the NRC. These "contracts" are captured in the NRC's regulations.

In addition to publications that detail the NRC's top priorities in its mission to protect people and the environment, such as the Strategic Plan, which was developed with public participation, the NRC also holds regular public meetings and conferences with its external stakeholders. These meetings provide a forum for stakeholders to voice concerns and make recommendations. Following these meetings, the NRC reviews all comments and evaluates the feasibility of implementing them, as well as their impact on safety. One of the most visible examples of NRC openness and public information sharing with external stakeholders is the annual Regulatory Information Conference, which is held in March of every year; in 2010, this 3-day conference attracted approximately 3,000 attendees, representing over 25 countries.

The openness and accessibility of the NRC's decisionmaking and regulatory processes are a key component in the agency's commitment to carrying out its mission. These various communication channels are intended to serve all NRC stakeholders. At all times, the NRC strives to create a decisionmaking environment that is consistent and predictable and that promotes openness, while ensuring that safety and security are not compromised.

Systematic Approach for Handling Nonconformances and Potential Nonconformances

The NRC continuously evaluates its internal controls and implements continuous process improvements.

MD 6.8, "Lessons-Learned Program," implements an agencywide program that provides reasonable assurance that major organizational problems (nonconformances) identified as lessons learned will not recur and that the knowledge gained from the lessons learned is

retained and disseminated in a manner that will maximize its benefit and usefulness to the staff. In addition, the NRC's KM activities support retention of lessons learned.

The NRC places a high priority on communicating with, and obtaining feedback from, staff, licensees, other Federal agencies, and interested external stakeholders. One example is the Reactor Oversight Process (ROP). The staff maintains the NRC's Web pages to communicate current ROP-related information and results. To promote communications with external stakeholders, the staff conducts monthly public working-level meetings with the Nuclear Energy Institute, the industry, and interested stakeholders to discuss the status of ongoing refinements to the ROP. The staff also conducts formal licensee meetings and other public stakeholder events in the vicinity of each operating reactor to discuss the results of the NRC's assessment of the licensee's performance and other topics of stakeholder interest. These annual meetings involving the public provide an opportunity to engage interested stakeholders in discussions of the NRC's role in ensuring safe and secure plant operations. In addition, the NRC performs an annual self-assessment in accordance with Inspection Manual Chapter 0307, "Reactor Oversight Process Self-Assessment Program."

In addition to the ROP self-assessment program, the agency has performed several independent evaluations since the inception of the ROP to analyze its effectiveness and recommend improvements. The staff publishes a survey in a *Federal Register* notice on a biennial basis to obtain external stakeholder input regarding ROP effectiveness and conducts internal surveys on a biennial basis (opposite years) to solicit and analyze stakeholder feedback from the NRC staff to inform the staff's annual self-assessment.

Additionally, in response to the Davis-Besse reactor vessel head degradation event, the NRC's oversight of safety culture at operating reactors has been strengthened. This started with the 2006 initiative to better incorporate safety culture in the ROP; since then, the staff has further improved the program based on lessons-learned experience, special internal reviews, and feedback from internal and external stakeholders. The staff will continue to solicit feedback from stakeholders to inform future improvements to the ROP, including implementation of safety culture oversight, and make refinements in accordance with the ROP self-assessment process.

Management System Review

It is the policy of the NRC (MD 3.17, "NRC Information Quality Program") to ensure the quality of all information it relies on for making decisions or disseminates to the public. The NRC's policies and practices are designed to ensure that the appropriate level of quality commensurate with the nature of the information is established and maintained. Thus, the most influential scientific, financial, and statistical data are subject to the most rigorous quality standards. Influential scientific, financial, or statistical information is defined as information that forms the technical basis for a substantive rulemaking that has substantial impact on an industry. The NRC will correct information that does not meet its standards and the OMB guidelines on the basis of the significance and the impact of the correction.

Each document system has its own requirements and procedures for review and update. Overall, the management system is up to date. Key documents are reviewed and updated at appropriate frequencies. However, in recent years, the NRC did note one area for improvement, which is being implemented. In 2005, agency officials recognized that the NRC's MD system needed improvements and formed a Management Directives Working Group (see "Final Report of the Management Directives Working Group" (ADAMS Accession

No. ML0611990096)). One of the working group recommendations was that the MDs be reviewed and reissued every 5 years. As a result, the NRC established the 5-year review plan (ADAMS Accession No. ML081540095), in which all agency offices have been or will be requested to review the status of MDs under their purview. This 5-year plan is currently ongoing (from 2008 until 2012). Some MDs have already been reviewed, and some are scheduled for review later in the 5-year timeframe.

Assessment Summary

The NRC management system was not specifically designed to meet any domestic or international quality management standards. However, aspects of the system were designed to meet Federal requirements that align with the goals and intent of GS-R-3 (e.g., Strategic Plan, MDs, PART reviews). The NRC's quality management system compares favorably to the criteria described in GS-R-3 in the following specific areas:

- **Management System:** The NRC has an established management system that is regularly assessed and continually improved. The system is aligned with the goals of the NRC.
- **Management Responsibility:** Management at all levels in the NRC demonstrates its commitment to the establishment, implementation, assessment, and continual improvement of the management system and allocates adequate resources to carry out these activities.
- **Resource Management:** NRC management determines the amount of resources necessary and provides the resources required to carry out the activities of the NRC.
- **Process Implementation:** NRC processes meet requirements and deliver products to support the safety mission of the agency. Specifically, documents and products are controlled. Purchasing requirements are well established and documented. Internal communications concerning the implementation and effectiveness of the management system take place at all levels of the NRC. Organizational changes are evaluated, communicated, monitored, tracked, and recorded to ensure that safety is not compromised.
- **Measurement, Assessment, and Improvement:** The effectiveness of the NRC management system is continuously monitored and measured to confirm the ability of the agency's processes to achieve the intended results and to identify opportunities for improvement.

The NRC compared favorably with the GS-R-3 requirements in most areas. In its self-assessment, the NRC identified that it does not have an overarching document describing the many complex components of the agency's management system, as required in Sections 2.8, 2.9, and 2.10 of GS-R-3. In response, the NRC is developing a comprehensive management systems document, with the expectation that it will be modified to incorporate other outcomes of the IRRS mission before being finalized and formally published as a guideline for all NRC staff.