Basic Attributes and Objectives of an Effective Corrective Action Program

The proposed process to provide licensees with credit for effective corrective action programs (CAPs) establishes objectives and attributes that licensees would be required to include in their CAP to enable the NRC to apply the proposed Enforcement Policy criteria. The staff presented the CAP objectives and attributes to stakeholders in public meetings, and there is general agreement among licensees that the objectives and attributes are applicable to an effective CAP. The basic objectives and attributes of an effective CAP are described below.

(1) Policies, Programs, and Procedures – The licensee describes the CAP expectations, requirements, and implementation processes in policies, programs, and/or procedures that apply to and are uniformly implemented across the licensee's organization and licensed operations.

(2) Identification, Reporting, and Documentation of Safety and Security Issues – The licensee staff, supervisors, and managers routinely recognize and promptly report safety and security issues in a manner that supports the timely and effective assessment of issues. CAP related information is appropriately documented and retained for reference to support the communication, tracking, and trending of information.

(3) Significance Assessment and Causal Evaluation of Safety and Security Issues – The licensee's assessment of the actual and potential significance of issues enables it to appropriately apply its graded risk approach, based on the issues significance, to the timing and scope of response to the issues, including the depth and detail of the causal evaluation. The licensee's application of its causal evaluation process routinely enables it to adequately identify issue causes related to issues and the contributing factors and root causes of the issues of greatest significance.

(4) Development and Implementation of Corrective Actions for Each Issue – The licensee's identification and implementation of corrective actions is timely and routinely effective in preventing the recurrence of the same issue or the occurrence of similar safety and security issues, and is most effective in preventing the recurrence of issues of the greatest significance.

(5) Assessment of Corrective Action and Program Effectiveness – The licensee's implementation of its CAP results in the identification and implementation of effective corrective actions and the recognition and resolution of ineffective corrective actions. The licensee implements a CAP assessment process that enables it to identify and correct CAP performance issues that reduce CAP effectiveness in the identification, reporting, assessment and correction of safety and security issues and the prevention of the recurrence of the same issues or occurrence of similar issues.