

Resolution of Comments for
IMC 0307 Appendix B

Source	Comment	Added	Remarks
NSIR/IRIB	No Comments	N/A	N/A
NSIR\RSOB	Not sure if "Fall" is a good term. How about beginning of 4 th quarter? Or even specify the month i.e. September	Yes	Changed to September/October.
NRR/IRIB	The TS branch is going to Division of Safety Systems (DSS) as part of the reorganization	Yes	Deleted the reference to DIRS before the branch names.
NRR/IRIB	Should mention that RP Reports – IP 28 "IP Analysis Report" can be used to generate that data.	Yes	Added statement.
NRR/IRIB	Consider March so that 4 quarter inspection data can be analyzed. There is enough fluff in this schedule to allow this to occur; other dates could be adjusted slightly. Additionally the creation of RPS Report 28 makes this task less time intensive for IP owners.	No	Keeping the schedule as stated. There was slippage during the process that could not have been easily accommodated if the start of the review period began later.
NRR/IRIB	Consider revising 0307, App B to make a reference to IMC 2523.	Yes	Added Reference in discussion of review process.
OE	No Comments	N/A	N/A
RI	Page B-1, 2. Background paragraph 2 1. First sentence references Att 1-2. Looks like it's is actually Att 2-1. 2. Remove reference to "in the office of Nuclear Security and Incident Response (NSIR)". Makes it difficult to read. 3. Remove reference to "Nuclear Reactor Regulation". Makes it difficult to read.	1. Yes 2. No 3. No	1. Fixed reference. 2. and 3. Kept offices for clarification.
RI	Page B-2, Section 3.b.8 Remove hyphen from IMC 1245	Yes	Fixed typo.
RI	Page B-3, Section 3.d.4 Delete extra "r" in first word "Regional"	Yes	Fixed typo.
RI	Page B-3, Section 3.e second paragraph Change "his/her" to their as their is used everywhere else	Yes	Made correction.

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RI	Page B-4, Section 3.f last paragraph, Add "if required" to second sentence "The outcome of the review is to recommend and approve, if required, a realignment of inspection resources across..."	Yes	Made recommended change.
RI	Page Att 1-1, Focus Areas box, What is B.5.a?	Yes	Removed reference.
RI	Page Att 2-1, under Program Optimization third paragraph, What are severe program events? Is this defined somewhere else?	No	Refers to events such as Fukushima.
RI	Page Att 2-1, under Program Optimization sixth paragraph 1. Add the reference from the seventh paragraph related to licensee past inspection performance. See next comment. 2. "Consider inspector and region feedback, taking into consideration value added inspector field observations that do not result in a finding but where there is an observed safety impact; Agency initiatives; feedback forms; internal surveys, and licensees past inspection performance."	Yes	Made recommended changes.
RI	Page Att 2-1, under Program Optimization seventh paragraph. See previous comment. Remove the reference to licensee past inspection performance. It seems out of place when talking about rulemaking and regulations.	Yes	Made recommended changes.
RI	Page Att 3-2, Section 7 1. Delete extra 7 below the first 7 2. In the first bullet, add "increase/decrease inspection hours" before "no change recommended"	Yes	Made recommended changes.
RI	Page Att 4-1, Second row, last column, Should this include the Review Team under the Participants column?	Yes	Made correction.
RII	No comments	N/A	N/A

Source	Comment	Added	Remarks
RIII	<p>Att 2-1 "Quantitative (Template) states "Consider improvements which can increase the effectiveness of IPs based on the following quantitative analysis; number of findings per 1000 hours, traditional enforcement violations, percentage of NRC identified findings, and color of the findings."</p> <p>Some identified "issues" result in significant changes to a facility but may not be captured in a finding. For example, backfits are NOT included in the list above but are outstanding examples of safety-changes a plant made as a result of an inspection. In addition, at one site, resolution of a URI caused a change to a pending Technical Specification but did NOT result in a finding. These significant issues would not be counted using the above criteria.</p>	No	Backfits and technical specification changes are identified in the review criteria.
RIII	<p>Att 3. Some identified "issues" result in significant changes to a facility but may not be captured in a finding. For example, backfits are NOT included in the list above but are outstanding examples of safety-changes a plant made as a result of an inspection (CDBI). In addition, at one site, resolution of a URI (from a CDBI) caused a change to a pending Technical Specification but did NOT result in a finding. These significant issues would not be counted using the above criteria.</p>	No	Backfits are included in the review criteria and the criteria is referenced in Att 3.
RIII	<p>Att 3. Need to include NOV to list of items to count.</p>	No	As part of the analysis NOVs and URIs are captured in the reports analyzed by the IP owners. Section 3. of Att 3. has an Etc. as that section does not list every type of data listed in the reports.

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RIII	Att 3. Suggest adding URIs to the list of items to count. The resolution of URIs take additional resources and may explain why an inspection exceeded the estimated hours.	No	See above.

<p>RIV</p>	<p>Revise the evaluation criterion of findings per 1000 inspection hours. A more subjective criterion would be more appropriate. There are some inspection procedures that don't lend themselves to more-than-minor findings, but that may still be effective in ensuring compliance with regulation, improving nuclear safety, and in driving desired licensee behaviors. Using the number of findings as a basis for adjustment without weighting this criterion with subjective insights may be detrimental to the overall program. For example, the old triennial Maintenance Rule inspection yielded very few more-than-minor violations and was eliminated; however, many minor violations were identified during these inspections resulting in needed corrective actions being taken by licensees. When this module was eliminated, many maintenance rule programs deteriorated significantly. Many inspectors believe that the elimination of this inspection activity was ill-advised. I therefore recommend modifying the discussion of the review processes, the review criteria, and the format for inspection procedure evaluation thusly: If an IP is identified to have a low number of findings per 1000 hours, direct the reviewer, prior to recommending changes, to discuss the inspection procedure with at least one inspector from each region to determine, whether the IP adds value to the inspection program and whether the performance of the inspection beneficially impacts nuclear safety. Consider insights from these inspector discussions when evaluating changes to the IP. Though we do not tally or track minor violations or CAP item initiation which come out of these inspections, the inspectors</p>	<p>No</p>	<p>The IMC does have the IP owners working with regional representatives assigned to the team, SME, and others (such as OpE experts) during the evaluation of the IP. Those discussions along with the discussions at the review and approval meetings take into consideration all of the criteria.</p> <p>The ROP realignment review process was revised this year to put less emphasis on the Quantitative Criteria. The revised Criteria were reviewed and approved by Division Directors.</p>
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RIV	performing the inspections have a good idea of whether value is being added and safety is being improved through these mechanisms.		
RIV	Font problem in Attachment I	Yes	Made correction.