

**From:** Brown, Frederick  
**Sent:** Wednesday, November 16, 2011 4:22 PM  
**To:** Beckford, Kaydian; FAST Resource; Cartwright, William  
**Cc:** Lubinski, John; Franovich, Rani; Wertz, Trent  
**Subject:** Closure of GT G20110745

The attached e-mail completes DIRS action on Ticket G20110745

**From:** Brown, Frederick  
**Sent:** Wednesday, November 16, 2011 4:19 PM  
**To:** jmo4rep@juno.com  
**Cc:** Franovich, Rani; Lubinski, John  
**Subject:** Response to your e-mail of October 15

Dear Representative Oxford:

Thank-you for your email on October 15, 2011, regarding a letter from Mr. Lawrence Criscione to Bill Borchardt, the Executive Director for operations at the U.S. Nuclear Regulatory Commission. I understand that you met with representatives from the NRC's Region IV office last week and that the subject of Mr. Criscione's letter came up toward the end of the meeting. As Mr. Vogel indicated to you at that time, the concerns raised in Mr. Criscione's letter were submitted under the provisions of Title 10 of the Code of Federal Regulation, Section 2.206. A Petition Review Board has been established to review those concerns. Nevertheless, I am responding to your email to describe the general philosophy, objectives and features of the Reactor Oversight Process (ROP).

On April 2, 2000, the NRC implemented the ROP at all operating commercial nuclear power plants. The objectives of the staff in developing this new oversight process were to provide tools for inspecting and assessing licensee performance in a manner that was more performance-based, risk-informed, objective, predictable, and understandable than the previous oversight processes. In developing the ROP, the staff revised many aspects of the old oversight process, such as the inspection program, assessment process, and enforcement policy, to meet the above stated objectives and be better integrated and streamlined. Additionally, the staff created new oversight features such as performance indicators and a significance determination process for characterizing the relative importance of inspection findings. The resulting ROP is now an established and mature oversight process to inspect, measure, and assess the safety performance of commercial nuclear power plants and to respond to any decline in plant performance. The ROP focuses inspections on areas of greatest risks, applies greater regulatory attention where there are plant performance problems, uses objective measurements of performance, gives the public timely and understandable assessments of plant performance, and provides responses to violations in a predictable and consistent manner that corresponds to the safety significance of the problem.

The ROP framework for assessing organizational issues has evolved since 2002, when severe boric acid corrosion of the Davis-Besse Reactor vessel head was discovered and was attributed, in large part, to a weak safety culture. Assessment of organizational culture is now woven into the structured framework of the ROP in the form of cross-cutting issues in the areas of Human Performance, Problem Identification & Resolution, and Safety Conscious Work

Environment. A cross-cutting issue is defined as an attribute associated with the cause of an inspection finding that was potentially indicative of underlying organizational issues. Since organizational issues in turn could affect multiple facets of plant operation they are considered under the ROP's performance assessment process and responded to in a graded approach based on the duration of the issue.

Claims of mistakes by NRC inspectors have been referred to the NRC's Office of the Inspector General.

Should you have any questions about the ROP, please do not hesitate to call me at (301) 415-1004, or Ms. Rani Franovich at (301) 415-1868.

Very respectfully,

Fred Brown  
Director, Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission