

ROP Enhancement - Assessment Program Project Plan

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Goal: The goal of the ROP Enhancement Project is to take a fresh look at the ROP to address the following questions:

- Is the ROP helping us achieve what we need to achieve as a regulator?
- Is the ROP adequate for the current environment (e.g., external event uncertainties, plants entering the period of extended operation, effects of power up-rates, new corporate/financial structures, etc.)?
- What is the nexus between the ROP and industry safety performance?
- What is working? What is not? What should be improved?

Scope: The initial scope of the Assessment Program portion of the project is to:

- Develop ways to ensure timely completion of corrective actions in preparation for supplemental inspections
- Perform an SCCI effectiveness review
- Address the long-standing SCCIs
- Examine Action Matrix Column distinctions
- Examine other assessment areas for enhancement (e.g., ensuring consistent consideration of Operating Experience during annual assessment reviews)
- Coordinate/include recommendations from the Independent ROP Review
- Security SDP
- PIs?

Known Areas for Possible Enhancement:

Supplemental Inspection Completion Timeliness

Problem Statement : Three out of the last 6 years (2 out of last 3), the ROP Metric AS-4 was missed based on an increase of the average number of days from issuance of the assessment letter to the completion of the supplemental inspection. However, delays in completing supplemental inspections often are a result of licensees not completing the necessary corrective actions and, thus, not being ready for inspection in a timely manner. The staff identified supplemental inspection timeliness as a potential improvement area to ensure a timely regulatory response to declining performance, and will be exploring options as part of the ROP enhancement effort. Approximately 28% of supplemental inspections (mostly 95001 and 95002) are completed greater than 180 days from the date the assessment letter is sent informing the licensee the NRC intends to perform a supplemental.

SCCI Effectiveness Review

Problem Statement: Examine what identification of SCCIs was intended to accomplish vs. what is has accomplished. Determine if there are any implementation issues/concerns (e.g., long-standing SCCIs with no corresponding improvement). Potential elimination of cross-cutting components. Address Regional inconsistencies in applying criteria for opening or closing SCCIs. Determine if consideration should be given to additional weighting for cross-cutting aspects assigned to greater than green findings.

Addressing Long-standing SCCIs

Problem Statement: Most (73%) SCCIs are addressed within a 1.5 years of being identified. However, some sites have had SCCIs open for lengthy periods of time. Examples of these long-standing SCCIs range from 3-5 years with some still not satisfactorily addressed. Reasons

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for not closing the SCCI include competing priorities, planned corrective actions being delayed (indefinitely), and licensee management not understanding how to satisfactorily address the SCCI.

Action Matrix Column Distinctions

Problem Statement:

- i. Are columns 1 and 2 sufficiently different to warrant distinction?
- ii. Is the unacceptable performance column needed?
- iii. What is the difference between unacceptable performance and IMC 0350?
- iv. Review of criteria for entering column 3

ROP Feedback Forms

Problem Statement (ROP FF 0305-1660): The IMC 0305 definition of Multiple/Repetitive Degraded Cornerstone potentially makes the Agency's ability to complete a 95002 inspection the determining factor for a transition in the Action Matrix to the Multiple/Repetitive Degraded Cornerstone column. This puts unnecessary time and resource pressure on the Regions and licensees to complete a 95002 inspection and assessment prior to the end of the fourth quarter with the goal of preventing the licensee from automatically transitioning to the Multiple/Repetitive Degraded Cornerstone Column. Currently the licensee is being held to a start time of "the beginning of the quarter the finding is first applicable" to assess their performance. Even though the finding's significance and plant's performance assessment might not be issued until 7 months after the applicability starts. This timeframe depends on many variables:

- a. What part of the quarter the finding is identified in – (licensee response can be held accountable for up to 3 months before the finding was even identified)
- b. The type of inspection during which the finding was identified
- c. When was it exited/re-exited
- d. How long the SDP process takes
- e. When an additional White finding occurs

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Major Milestones

Action/Activity	Date	Lead	Participants	Notes
Conduct early discussion with IMC 0305 Working Group	June-July 2013	Roche	Kevin/IMC 0305 Working Group	Complete
Conduct early discussion with industry during ROP Monthly Meeting	June 26, 2013	Roche	Kevin/NEI ROP Working Group	Complete
SCCI Effectiveness Review	Oct 2013 – Feb 2014	Merzke	Merzke/Staff	
Receive and Analyze Independent Assessment Review Report	Nov 2013	Merzke	Kevin/IMC 0305 Working Group	
Conduct Assessment Enhancement internal kick-off meeting	Nov 2013	Merzke	IMC 0305 Working Group	
Interface with external stakeholders/Public meeting	Nov 2013	Merzke	NRC Staff, Industry, NGOs	
Conduct analyses on Assessment Areas	Oct 2013 – Feb 2014	Merzke	IMC 0305 Working Group	In progress
Present proposal on changes to internal stakeholders	Mar 2014	Merzke		
Public Meeting w/ External Stakeholders on recommendations	Apr 2014	Merzke	NRC Staff, Industry, NGOs	
Finalize recommendations and submit report input	Apr 2014	Merzke	IMC 0305 Working Group	Document in report
Consolidate report inputs and finalize report	May 2014	Merzke		
Obtain concurrence on report	May-Jun 2014	Merzke		
Implement changes and revise program based on recommendations.	Jun - Dec 2014**	Merzke with Regional Input		**Schedule considerations based on complexity, need for external input, review time, and optimum implementation