Issues to Consider for the May 20, 2014 Public Meeting to Discuss the Industry Proposed Model to Replace the Substantive Cross-Cutting Issue Process

Issues NRC staff would like to see addressed at the May 20th public meeting:

NEI 09-07
- Independence of the safety culture assessment process.
- The staff noted inconsistent implementation of NEI 09-07 during the pilot observations (issue potentially exacerbated with multiple options in Revision 1 to NEI 09-07). Has any thought been given to standardizing implementation?
- Who ensures rigorous implementation of the process?
- Openness of the process. What about the process will be publicly available? There must be some transparency to the public if this will be replacing a significant part of the NRC's assessment process.
- What kind of training will assessment teams have? What kind of training will licensee monitoring panels and management get?

Corrective Action Programs
- NEI 09-07 section 3.1.1 states, "The CAP is the largest single source of potential input to the culture monitoring process. Because the CAP is so comprehensive and encompassing at most sites, it is incumbent on the site to select the subset of CAP evaluations that will be fed into the culture monitoring process." The industry initiative on cumulative impacts reduces the inputs into the CAP, as well as potentially reduces human error prevention tools, which seems counter-productive to the proposed model, which relies so heavily on the CAP.
- 3 of the 5 options described in NEI 09-07 show almost all inputs to the safety culture assessment as entries into the CAP. Robust licensee CAPs are critical to the ROP, and to the proposed model to assess safety culture. Some licensee CAPs are not as strong as others (e.g., sites with long-standing SCCIs).
- During the February 5th public meeting, industry was asked what is different about the proposed process from how licensees currently operate. The response was that licensees would use the entire CAP database from which to identify trends, instead of using 4 findings that are potentially unrelated. Why aren't licensees using the entire database now?
- In your proposed model, one of the outputs from the CAP is "Corrective Action Plans." Occasionally staff closes findings or SCCIs based on corrective action plans that may ultimately never be implemented, leading to further problems, or if implemented, may prove ineffective.

Process
- IP 71152 may not be the right tool for assessing safety culture programs. Inspector skill sets for PI&R may not be the same as those necessary to assess safety culture. It may be necessary to develop a new inspection procedure.
- Reduced confidence in licensee CAPs may require stronger regulatory action than an SL IV NOV. Consideration should be given to developing a graduated regulatory response. Staff would need to determine criteria to trigger a predictable regulatory response. Criteria would also need to be developed to differentiate acceptable from unacceptable safety culture.

- The implementation of the safety culture common language into the ROP has had no run time. This may lead to more alignment between industry and staff in whether or not an SCCI exists.
- What role does INPO have in safety culture monitoring? What role should INPO have?
- NRC inspectors may still tag inspection findings with cross-cutting aspects to independently identify causal factors for those findings, and to identify trends that may or may not be identified by the licensee.