

April 7, 2015

MEMORANDUM TO:

Ho Nieh
Director, Division of Reactor Projects
Region I

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Director, Division of Reactor Projects
Region II

Anne Boland
Director, Division of Reactor Projects
Region III

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FROM:

Scott Morris */RA/*
Director, Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT:

IMPLEMENTATION OF CHANGES TO THE
SUBSTANTIVE CROSS-CUTTING ISSUE PROCESS

This memorandum is being provided to the Regions to guide transition between the substantive cross-cutting issue (SCCI) process and the revised cross-cutting issue (CCI) process as outlined in the latest revision to Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program."

In November 2014, an NRC working group finalized a report with a number of recommendations to revise the SCCI process (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14328A544). Staff subsequently held a public meeting on November 19, 2014 (ADAMS Accession No. ML14328A157), to discuss the recommendations with stakeholders. With management concurrence on the recommendations, the staff revised IMC 0305 to incorporate the changes to the SCCI process. The revised process should be implemented during the 2015 mid-cycle review meetings.

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The revision to IMC 0305 changed the criteria to establish a cross-cutting theme for the “human performance” and “problem identification and resolution” cross-cutting areas. The revision also eliminated the word “substantive,” changing the terminology from SCCI to CCI.

For most licensees, the transition to the new criteria should be seamless. Licensees with no cross-cutting theme or SCCI documented in their 2014 annual assessment letters will be subject to the new criteria for the 2015 mid-cycle assessment period.

For licensees with an open SCCI, (Duane Arnold, Monticello, Prairie Island) documented the SCCI closure criteria for those SCCIs in the most recent assessment letter. Even though a licensee with an open SCCI may not meet the new criteria for a cross-cutting theme, the Region should ensure the licensees meet the closure criteria already promulgated in the publicly-available assessment letter prior to closing out the SCCI. If a licensee meets the closure criteria during the mid-cycle assessment meeting, then the Region should document the closure in the assessment letter. If the closure criteria are not met, then the assessment letter should document the issue remaining open, and it will be carried forward as a CCI. The assessment letter template will be revised to provide suggested wording.

In addition, for licensees with an open cross-cutting theme documented in the most recent assessment letter, the presence of the same theme (i.e, meeting the new criteria) will be considered the second consecutive occurrence of that theme for assessment purposes. If that licensee no longer meets the new criteria for a cross-cutting theme at the 2015 mid-cycle assessment meeting, then no theme would be documented in the mid-cycle assessment letter.

There are currently two licensees, (Point Beach and Palo Verde) with the same cross-cutting theme documented in two consecutive assessment letters for which no SCCIs were assigned. If these plants meet the criteria for the same theme using the new criteria, sufficient time has passed where a sustained number of findings existed in the cross-cutting aspect to be of regulatory concern. Therefore, if either of these licensees meets the new criteria for a cross-cutting theme for the 2015 mid-cycle assessment period, then that will constitute the third consecutive period with the same theme, and a CCI should be assigned using the new process.

The IMC 0305 process does not yet incorporate the recommendation to standardize the CCI closure criteria. The Regions retain some flexibility; however, closure via an inspection is encouraged. Division of Inspection and Regional Support staff are working on development of a new CCI closure inspection procedure with a goal to issue the document by January 2016.

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