

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Chairman Burns

SUBJECT: COMSECY-16-0016: PROPOSED REVISION TO THE
NOTIFICATION PROCESS FOR FORCE-ON-FORCE
INSPECTIONS

Approved X Disapproved ___ Abstain ___ Not Participating ___

Comments: Below ___ Attached ___ None X

Entered in STARS

Yes x

No _____



SIGNATURE

4 August 2016

DATE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER SVINICKI

SUBJECT: COMSECY-16-0016: PROPOSED REVISION TO THE
NOTIFICATION PROCESS FOR FORCE-ON-FORCE
INSPECTIONS

Approved XX Disapproved Abstain Not Participating

Comments: Below Attached None XX



SIGNATURE

08/ 8 /16

DATE

Entered on "STARS" Yes No

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Baran

SUBJECT: COMSECY-16-0016: PROPOSED REVISION TO THE NOTIFICATION PROCESS FOR FORCE-ON-FORCE INSPECTIONS

Approved Disapproved Abstain Not Participating

COMMENTS: Below Attached None

Less than 10 months ago, the Commission approved the staff's proposal in COMSECY-15-0025 to revise the process for notifying licensees of force-on-force (FOF) exercises, increasing the advance notice from 8-to-12 weeks to 9-to-15 months. The change was intended to better align the notifications with the 18-month timeline for Reactor Oversight Process (ROP) inspection notifications and to minimize disruptions in inspection scheduling. However, in December 2015, the ROP inspection notification timeline changed from 18 months to 24 months. As a result, the staff is now asking the Commission to again expand the advance notice for FOF inspections, this time from 9-to-15 months to 24 months.

I am disappointed that the staff did not factor the expected ROP inspection notification timeline changes into its original proposal to provide additional notice of FOF inspections. It is also unfortunate that the staff's original proposal did not take into account that the efficiencies of coordinating FOF inspections with ROP inspections and other onsite activities could best be achieved by integrating the FOF planning into the Reactor Program System Inspection Planning scheduling documents, which provide licensees with advance notice of expected inspections and regulatory activities.

If I thought this revised notification timeline would in any way compromise the effectiveness of the FOF exercises, I would disapprove the staff's request. However, FOF exercises are not intended to be surprise unannounced inspections and I do not view earlier notification as changing the dynamics of the exercises. The frequency of FOF inspections will remain once every three years for each site. Category 1 fuel cycle facilities would be notified along similar timeframes under this revised approach. Therefore, I approve this request to increase the notification timeframe to 24 months.

Entered in STARS

Yes
No



SIGNATURE
8/5/16

DATE