



Proposed Enhancements to the Reactor Oversight Process

**Reactor Oversight Process Public Meeting
July 19, 2018**



Enhancing the Reactor Oversight Process

- NRC has a number of initiatives ongoing to make the ROP more effective and efficient. Examples include:
 - Improvements to the inspection report development process
 - Previously-discussed initiative to improve the minor/MTM component of the issue screening process
 - Work to enhance the NRC's engineering inspection program (SECY to EDO in August)
- DIRS received input from stakeholders as part of the ongoing agency initiative associated with transformation:
 - ~60 recommendations from the internal stakeholders related to potential enhancements to the ROP
 - NEI publication and NRUG letter with proposals to improve the ROP
 - Expect follow-up letter from the industry with more refined suggestions for ROP enhancement (e.g., specific problems with focused proposals)



Internal Stakeholder Feedback

- The Transformation Team provided DIRS with consolidated stakeholder feedback related to ROP transformation.
- The feedback generally fit into several categories:
 - Changes to organization and staffing supporting oversight, primarily regional changes
 - Changes to frequency of inspections and focus of inspection procedures
 - Changes to make performance indicators more effective
 - Changes to the various components of the assessment process
 - Changes to make the enforcement program more risk-informed
 - Changes to streamline or eliminate inspection reports
- No assessment was done of the proposals; the input to DIRS consisted of direct feedback provide by NRC staff.



NEI Feedback

- NEI's March 2018 publication, "A Framework for Regulatory Transformation," provided recommendation in many areas.
- One stated objective to make the ROP more focused on issues with risk and safety significance, leading to timelier decision-making.
- Specific recommendations for ROP change include:
 - Eliminate White findings
 - Development of a risk-informed compliance process, where low risk compliance issues can be evaluated and addressed by the licensee without direct NRC inspection
 - Eliminate the use of SPAR models



NRUG Feedback

- NRUG's May 2, 2018, letter proposes a paradigm shift, where factors such as prompt corrective action are more fully considered in the response to an inspection finding.
- NRUG provided some suggestions on how this approach could be implemented, to serve as a starting point for discussion:
 - Provide credit for licensee self-assessment in the oversight program
 - Better communicate the actual risk of GTG findings
 - Eliminate White findings
 - Allow GTG findings to roll-off immediately after a successful supplemental inspection
 - Modify the EP SDP to more fully consider actual vs. potential consequences



Possible ROP Enhancements Based on Feedback

- Improvements to the inspection program:
 - Extend the work done to improve the engineering inspection program to assess other areas
 - Consider crediting licensee self-assessments in the inspection program
 - Enhance PIs (e.g., augment existing NRC PIs with a subset of INPO PIs); reduce inspection if performance meets an established standard
- Modifying the treatment of White findings:
 - Consider combining Column 1 and 2 or establish a scaled-back inspection approach for White findings that don't result in a licensee moving into the degraded cornerstone column
 - Change the way the NRC messages White findings (e.g., press releases)
 - GTG findings would no longer be Action Matrix inputs once the supplemental inspection is completed, even if it takes place in less than four quarters; similarly, PIs would remain inputs until the supplemental inspection is completed
- Complete the ongoing evaluation of the EP SDP and make improvements, if needed.



Challenges

- This work is not budgeted. The add/shed/defer process would need to be used to assess and implement the recommendations.
- A number of competing, high-priority activities are ongoing, such as:
 - Replacement Reactor Program System/auto-report generator initiative
 - Support for NRC backfit initiative
 - Extensive international support
 - Resident inspector recruitment and retention initiative
 - Resolving Red metrics from ROP self-assessment
- Many of the recommendations are complex, with the potential for unintended consequences if not implemented properly.
- Significant outreach will be needed with both internal and external stakeholders before moving forward with any of the recommendations.



Next Steps

- Industry to complete development of problem statement(s) and submit proposed enhancements to the NRC.
- Assess and resolve NRC resource challenges.
- Establish working group(s) to obtain stakeholder input, evaluate proposals, develop recommendations.
- Establish recurring discussion at monthly ROP public meetings, with separate focused public meetings on specific ROP enhancements.
- Commission approval will be needed for any significant changes to the ROP, per Management Directive 8.13.