



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 19, 2019

MEMORANDUM TO: Christopher G. Miller, Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Tara Inverso, Chief */RA/*  
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Generic Communications Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: REACTOR OVERSIGHT PROCESS PERFORMANCE METRIC  
REPORT FOR CALENDAR YEAR 2018

The Reactor Oversight Process (ROP) self-assessment program evaluates the effectiveness of the ROP by measuring its success in meeting its pre-established goals and intended outcomes. The staff performed the calendar year (CY) 2018 performance metric analysis in accordance with Inspection Manual Chapter (IMC) 0307, "Reactor Oversight Process Self-Assessment Program," dated November 23, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15216A347) and IMC 0307 Appendix A, "Reactor Oversight Process Self-Assessment Metrics," dated August 25, 2017 (ADAMS Accession No. ML17186A115).

Under Element 1 of the ROP self-assessment process described in IMC 0307, the staff measures the effectiveness of, and adherence to, the current ROP program using objective and measurable metrics. The staff uses a graded approach of Green, Yellow, and Red thresholds in order to measure performance against the metrics. In Appendix A of IMC 0307, the staff aligns and categorizes the ROP performance metrics with the five Principles of Good Regulation: independence (I), openness (O), efficiency (E), clarity (C), and reliability (R). The staff uses the metric analyses as an input to the annual Commission paper providing the results of the ROP self-assessment.

As a result of its analysis, which is summarized in Enclosure 1 and provided in detail in Enclosure 2, the staff found that all but one of the ROP performance metrics met the Green criteria as defined in Appendix A to IMC 0307. Specifically, the staff found that 25 out of 26 ROP performance metrics satisfied the Green criteria, while 1 metric was found to be Red.

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The metric found to be Red is “Responsiveness to ROP Feedback Forms” (E-6). A metric found to be Red indicates unexpected performance in the area measured by the metric, which requires further evaluation and staff action to address the associated cause(s). The staff received 59 new feedback forms in CY 2018 and dispositioned 13 of them within 12 months (22 percent, Green threshold is greater than 90%). With regard to year-over-year performance in this area, while the staff resolved more feedback forms in CY 2018 than in CY 2017, more new feedback forms were submitted in CY 2018 than CY 2017. Overall, the total number of feedback forms in the backlog remained unchanged from CY 2017 to CY 2018. This was the second year data was collected for this metric, and the second year that the metric was found to be Red.

The staff continues to take action to address timely resolution of ROP feedback forms, such as prioritizing resolution of all feedback forms tied to specific IP and IMC documents undergoing revisions, and providing increased engagement with monthly ROP feedback form disposition status update meetings with Division management. The Division of Inspection and Regional Support (DIRS) staff is currently performing a detailed review of the feedback form backlog to identify feedback forms which may be obsolete due to other ROP changes, or which may be able to be dispositioned in the near term. Additionally, DIRS leadership intends to issue a memorandum detailing expectations for IP and IMC leads, which would include timely disposition of feedback forms. As part of a holistic review of the ROP self-assessment program, the staff is evaluating more meaningful metrics with which to measure the efficiency of the feedback form process.

The staff expects that ROP enhancement initiative efforts in the area of inspection will likely trigger resolution of a number of ROP feedback forms in the areas of problem identification and resolution, supplemental inspections, and other areas. Additionally, the staff anticipates that the ROP enhancement effort may delay disposition of these feedback forms through CY 2019 due to reviews associated with the initiative. These delays may impact performance against the E-6 metric for CY 2019, however, as noted above, the staff will continue efforts to improve performance in this area.

Enclosure:

1. Self-Assessment Metrics  
    Overview/Dashboard
2. CY 2018 ROP Self-Assessment  
    Metrics Report

SUBJECT: REACTOR OVERSIGHT PROCESS PERFORMANCE METRIC REPORT FOR  
CALENDAR YEAR 2018

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**ADAMS Accession Nos.:**

ML19044A565 Package

ML19044A568 Memo

ML19044A573 (Enclosures 1 and 2)

**\* concurred via email**

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