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Proposal to Modify Treatment of Greater than Green Performance Indicators

ROP Public Meeting

April 24, 2019

Background

- ROP enhancement recommendation 2B.5 - prompt closure of White findings
- Adopting the recommendation would:
  - Encourage prompt evaluation, correction, and independent verification via inspection
  - Potentially impair aggregation of White findings – one of the ways ROP detects declining performance
- Overall staff believes the recommendation benefits safety and recommends adoption
- Staff noted that this benefit did not extend to the manner in which GTG PIs are treated; explored whether GTG PI treatment should be modified

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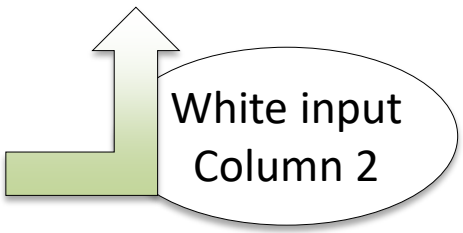
Current Treatment of GTG PIs



When PI becomes White	PI might return to Green before supp. inspection	Supplemental inspection
• White assessment input • Action Matrix Column 2 • Supplemental inspection scheduled	• No longer a White assessment input, even if no corrective actions taken or no supplemental inspection • Action Matrix Column 2	• Close issue or keep open • If PI has returned to Green but issue not closed, parallel White finding is opened. • Parallel White finding backdated to when PI returned to Green

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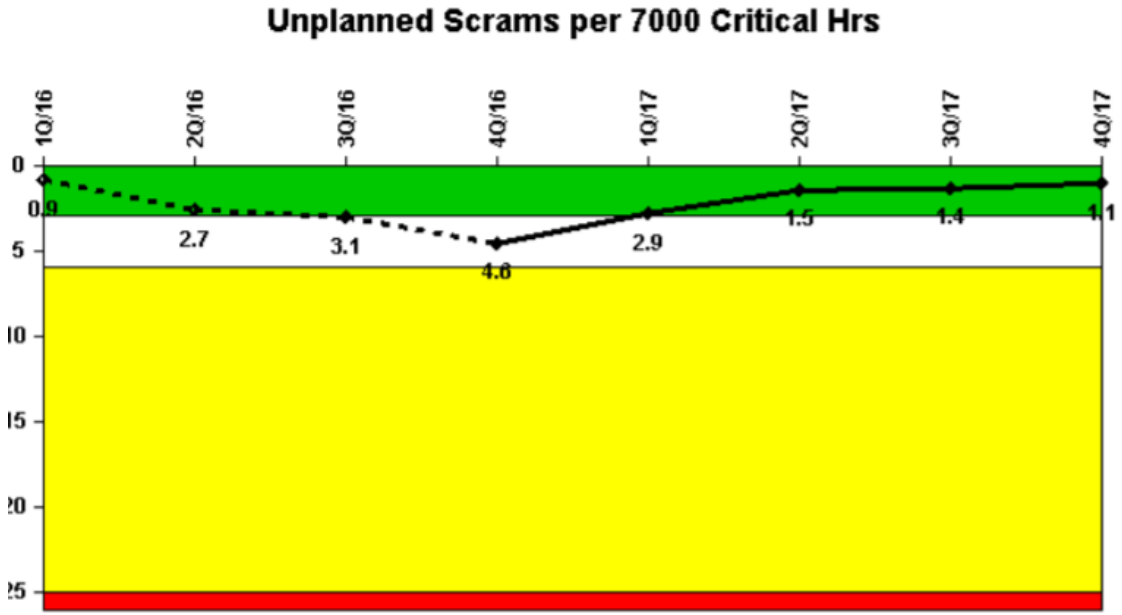
Current Treatment of PIs Example

- Unplanned scrams PI White in 3Q2016 and 4Q2016, returned to Green in 1Q2017
- Plant moved to Column 2 and remains in Column 2 pending supplemental inspection, even with all Green inputs



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Current Treatment of PIs Example

- Notification of readiness for inspection received in June 2017
- Inspection conducted in August 2017
  - Identified significant weaknesses in causal evaluations for scrams in March and June 2016
  - Parallel White finding issued in 4Q2017 and backdated to 1Q2017 (when PI returned Green)
- Parallel finding closed by inspection in 2Q2018

	2Q2016	3Q2016	4Q2016	1Q2017	2Q2017	3Q2017	4Q2017	1Q2018	2Q2018
Unplanned Scrams PI							Parallel White opened back to 1Q2017		95001 completed 6/28/18
Scrams PI parallel white finding	N/A	N/A	N/A	parallel White					
Action Matrix Column	Column 1	Column 2	Column 2	Column 2	Column 2	Column 2	Column 2	Column 2	Column 2
Assessment Inputs	All Green	1 White	1 White	All Green revised to 1 White	All Green revised to 1 White	All Green revised to 1 White	1 White	1 White	1 White

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Historical Data Review

- Excluded Yellow and Red Findings and PIs
- Excluded White inputs encompassed in 95002 or 95003 inspections
- Could not locate licensee readiness dates for some inspections, particularly early in ROP
  - These inspections not included in timing data

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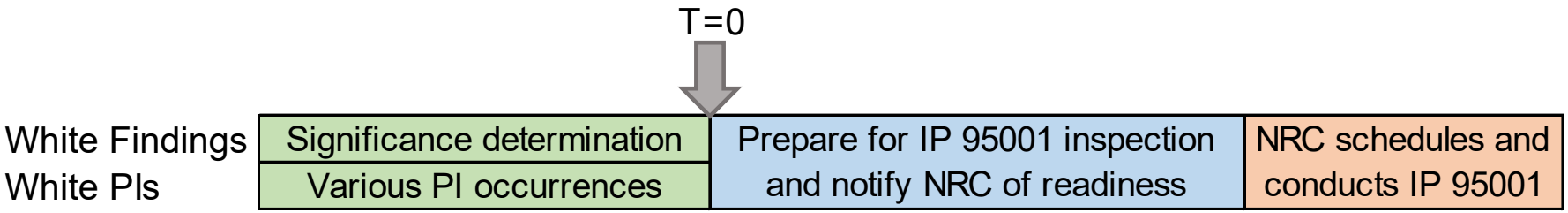
Historical Data Review

- Focus on common part of process – after GTG finding issued or PI submitted
- White PI start time: first day of quarter in which White PI reported
  - Ex: By 1/21/15 a 4Q2014 White PI is submitted. Start date assumed to be 1/1/15.
- White finding start time: date of issuance of final significance
- This is the point in both processes when it is known that a supplemental inspection will occur



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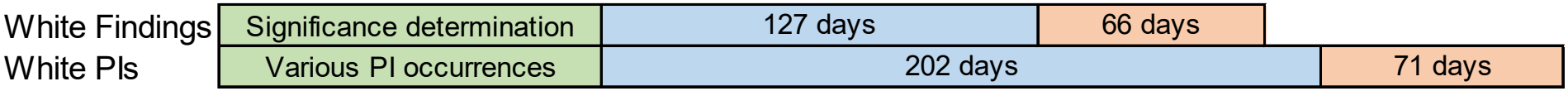
Historical Data Review

	White Findings	White PIs
Time for supplemental inspection readiness	127 days average (2% greater than 1 year) (7% greater than 3 quarters)	202 days average (9% greater than 1 year) (26% greater than 3 quarters)
Time for agency to complete supplemental inspection	66 days	71 days



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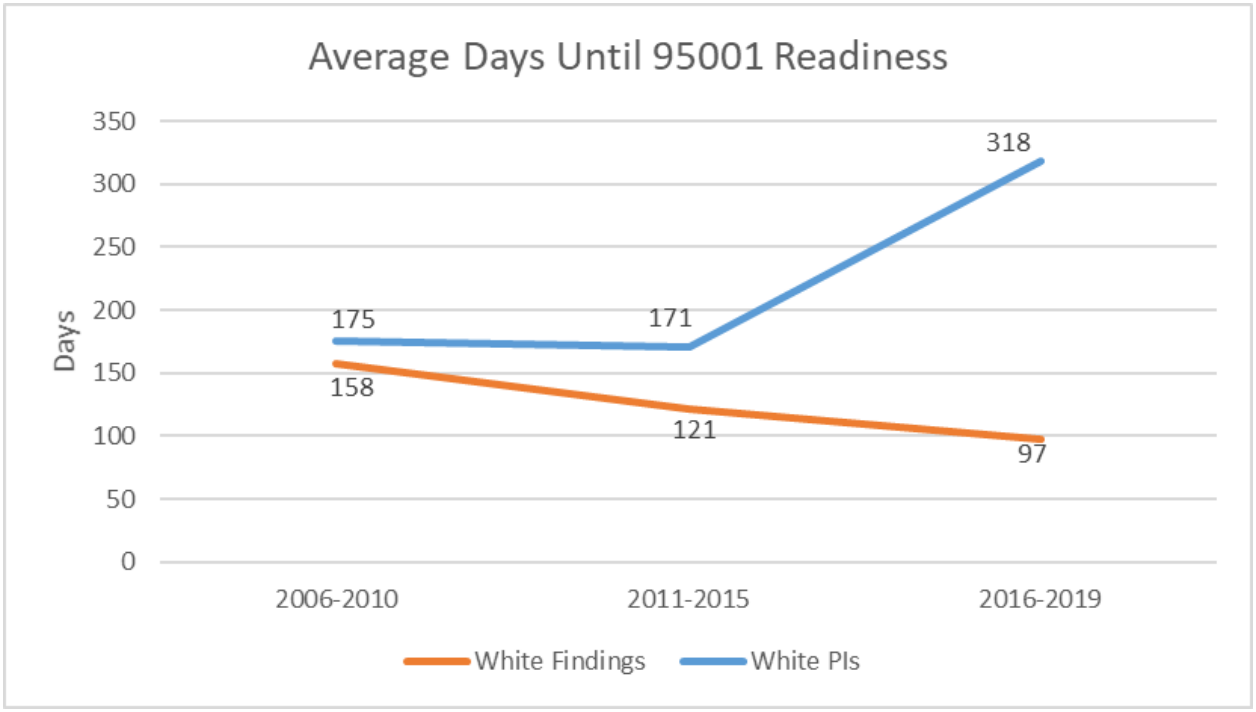
Historical Data Review

- Time until readiness for White PIs has been increasing while decreasing for White findings



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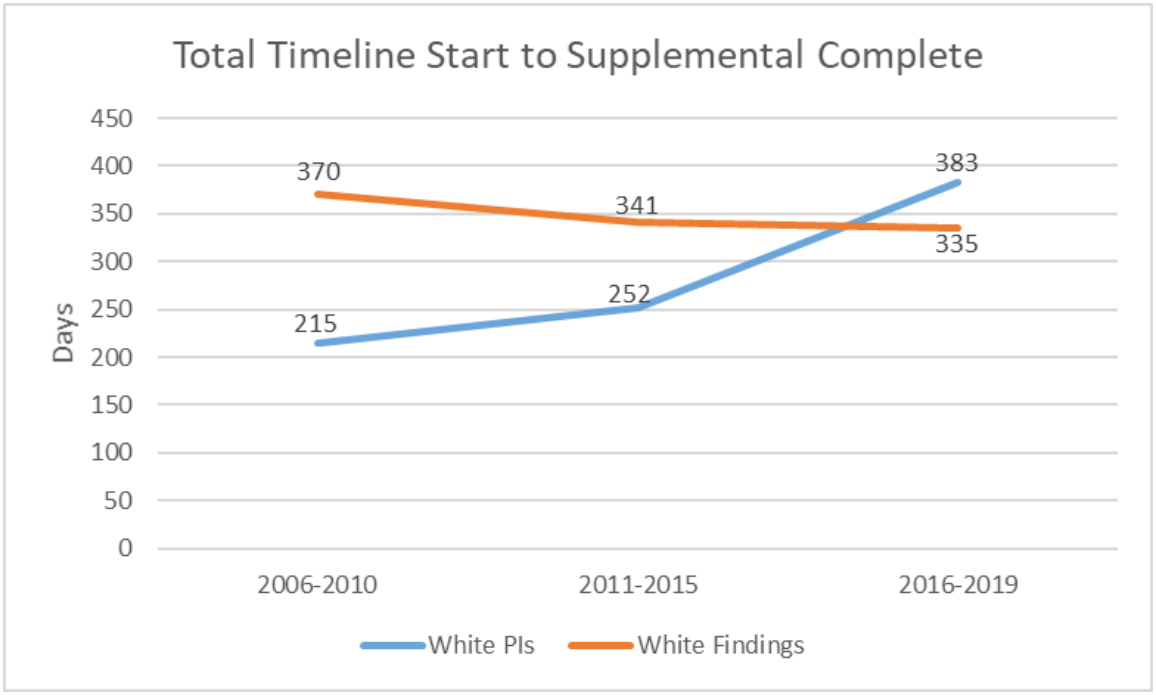
Historical Data Review

- Similar trend observed in overall timelines from finding start date/PI submittal to completed supplemental inspection



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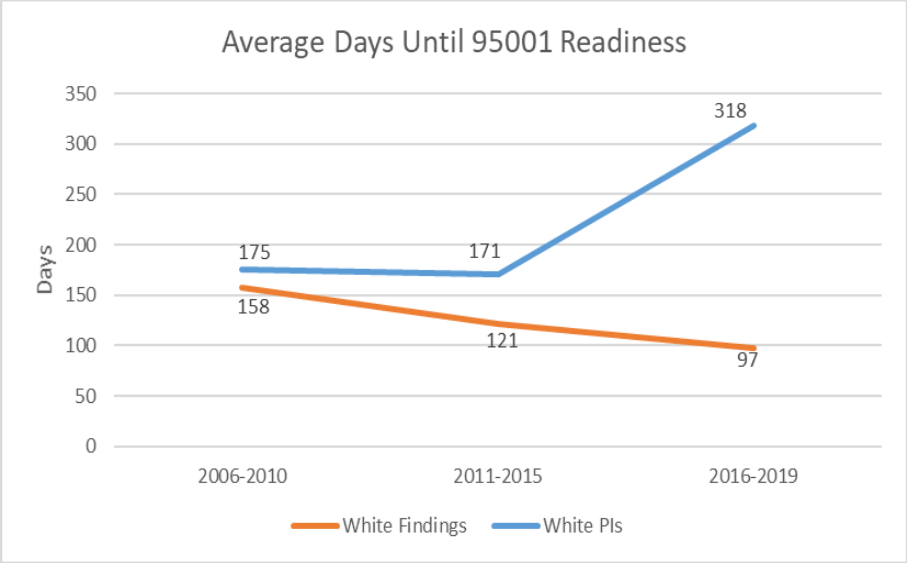
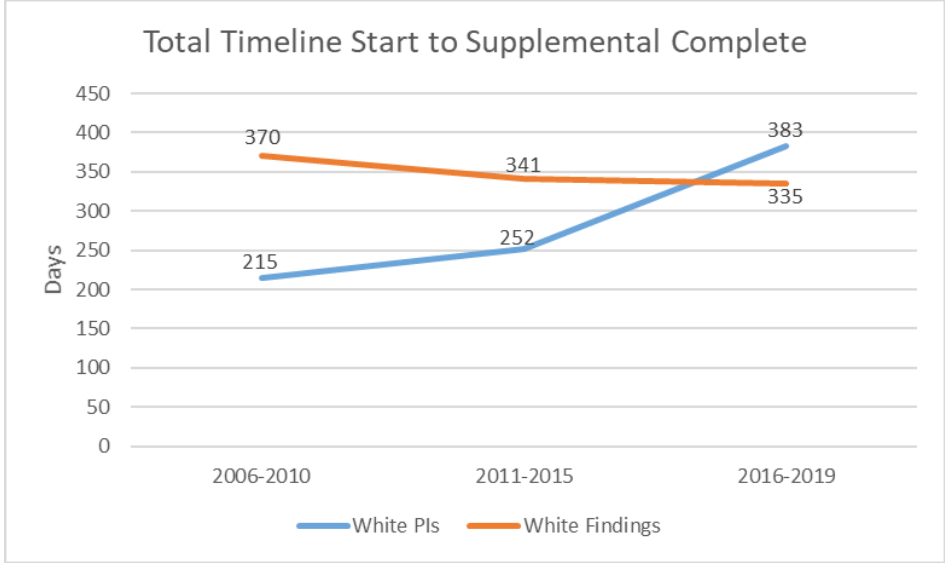
Data Conclusions

- Licensees taking more time to prepare for supplemental inspections for PIs than Findings
- The “readiness gap” is widening





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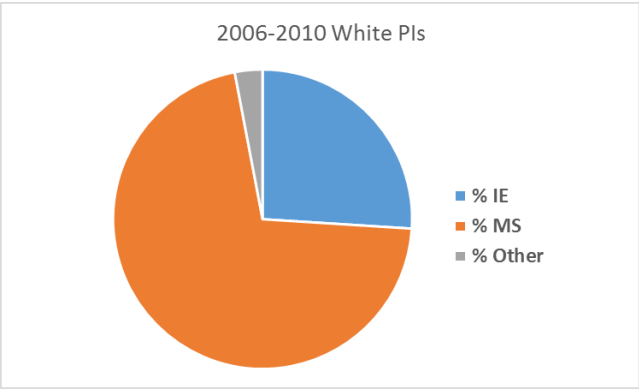
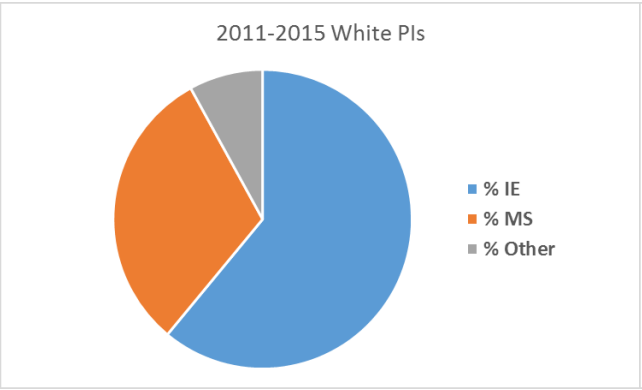
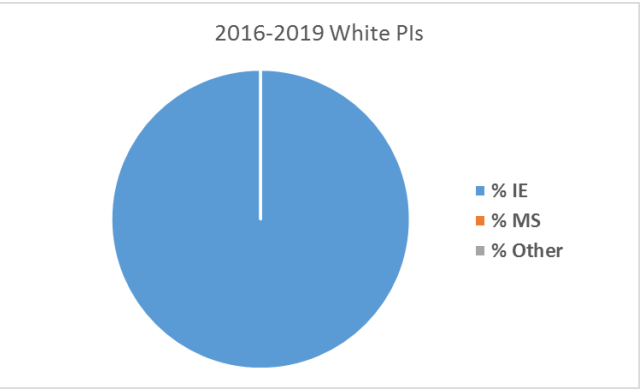
Data Conclusions

- Increase in time for readiness of inspection of White PIs despite White PIs shifting into IE cornerstone
- IE cornerstone PIs involve discrete events that are individually evaluated when they occur, which would seem to streamline supplemental inspection preparation







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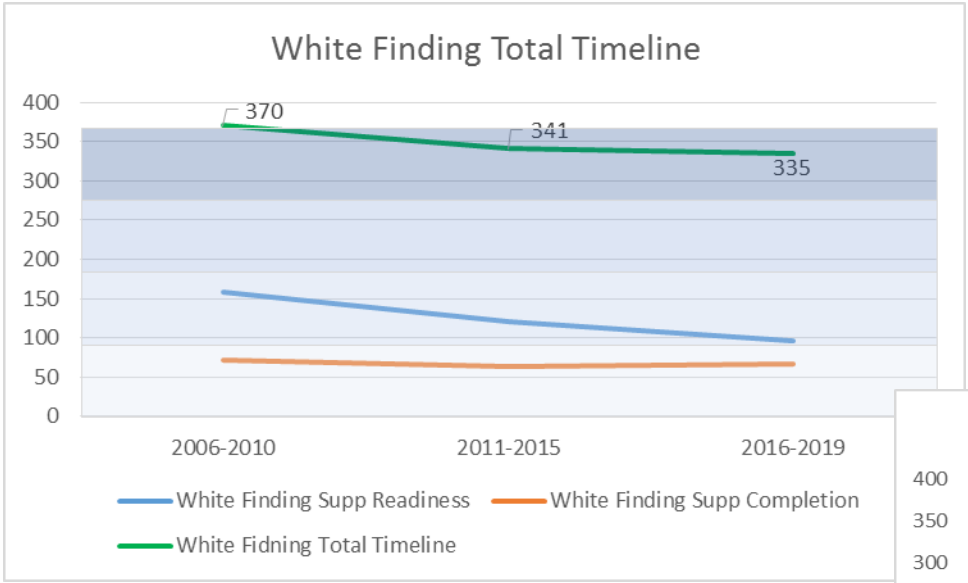
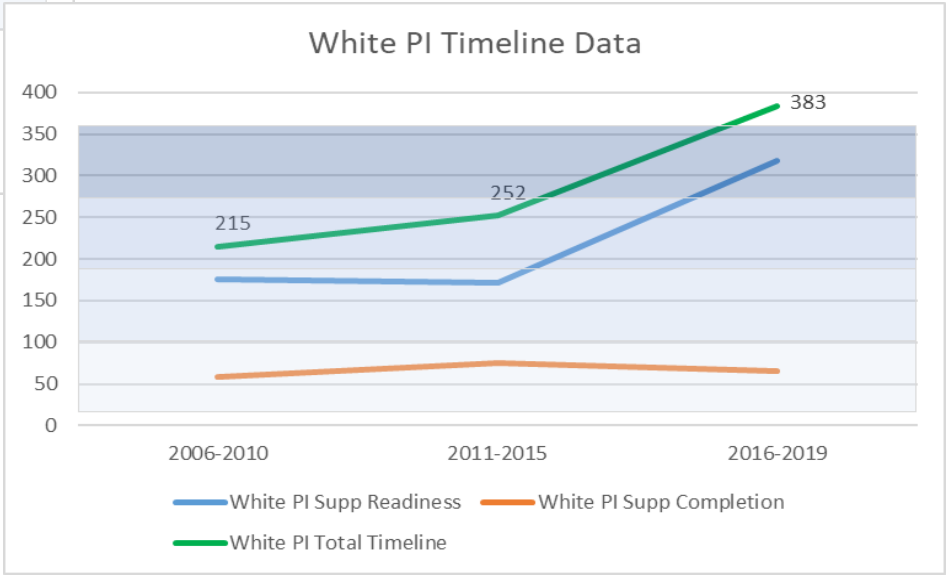
Data Conclusions

- PIs are data driven so staff does not believe increased time is due to disagreement with characterization of the issue
- Does not appear to be due to IP 95001 scope concerns since the readiness trend (and overall timeline trend) for GTG findings is decreasing
- The four quarter requirement for GTG findings may be a reason for the trend toward quicker readiness for GTG finding supplemental inspections

Data Conclusions





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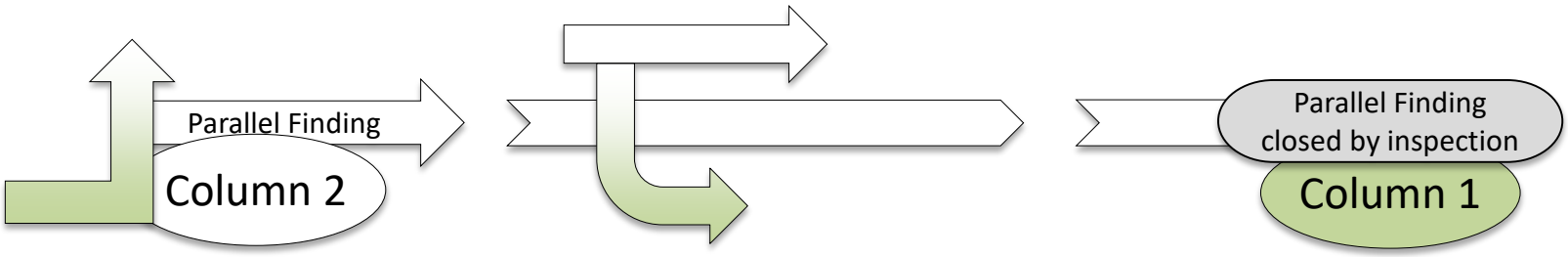
Proposed Treatment of GTG PIs



When PI becomes White	PI data reported as usual	Supplemental inspection
• White parallel finding is opened and is the assessment input • Action Matrix Column 2 • Supplemental inspection scheduled when licensee is ready	• PI data might return to Green or stay GTG • Either way the parallel finding is tracking the issue that must be inspected	• Either closes the parallel finding or keeps it open • If closed, plant moves to Column 1 even if PI hits haven't rolled off PI calculation yet

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Proposed Treatment of GTG PIs

- Benefits of proposed approach:
  - Encourages prompt correction and inspection of issues
    - PI hits can be removed once inspection closes the parallel finding
    - Action Matrix movement upon inspection completion
  - Elimination of backdated parallel findings
    - Enhances regulatory certainty
    - More timely and stable assessment results

Proposed Treatment of GTG PIs Example 1

- Revisiting the unplanned scrams GTG PI example

	2Q2016	3Q2016	4Q2016	1Q2017	2Q2017	3Q2017	4Q2017	1Q2018	2Q2018
Unplanned Scrams PI							Parallel White opened back to 1Q2017		95001 completed 6/28/18
Scrams PI parallel white finding	N/A	N/A	N/A	parallel White					
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Unplanned Scrams PI		Parallel finding opened							95001 completed 6/28/18
Action Matrix Column	Column 1	Column 2	Column 2	Column 2	Column 2	Column 2	Column 2	Column 2	Column 2
Assessment Inputs	All Green	1 White	1 White	1 White	1 White	1 White	1 White	1 White	1 White

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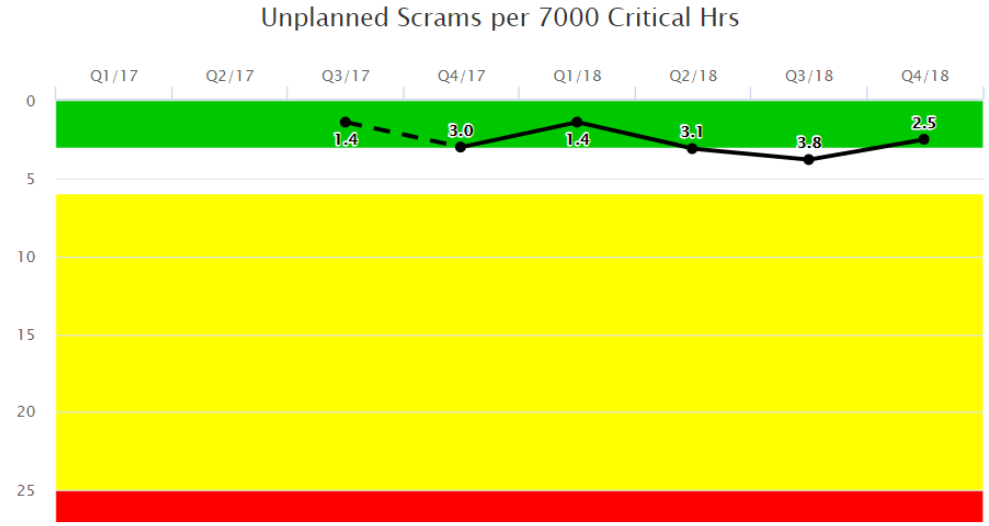
Proposed Treatment of GTG PIs Example 2

- Assume PI went White in 4Q2017 due to scrams in 1Q2017 and 4Q2017
- 2 additional scrams in 2Q2018



Thresholds: White > 3.0 Yellow > 6.0 Red > 25.0

Notes

Unplanned Scrams per 7000 Critical Hrs	Q1/17	Q2/17	Q3/17	Q4/17	Q1/18	Q2/18	Q3/18	Q4/18
Unplanned Scrams	1.0	0	0	1.0	0	2.0	1.0	0

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Proposed Treatment of GTG PIs Example 2

- After going White in 4Q2017 the PI returned to Green in 1Q2018
- Two additional scrams in 2Q2018 drove the PI White again
  - Supplemental inspection had not been scheduled yet
- Supplemental inspection completed in December 2018 and plant moved to Column 1

Proposed Treatment of GTG PIs Example 2

- Existing process provided little incentive for prompt evaluation and readiness for supplemental inspection, until the two additional scrams drove the PI White again
- Under the proposal, had a supplemental inspection closed the White PI issue before the end of 2Q2018, the new PI hits would not have resulted in a White PI in 3Q2018

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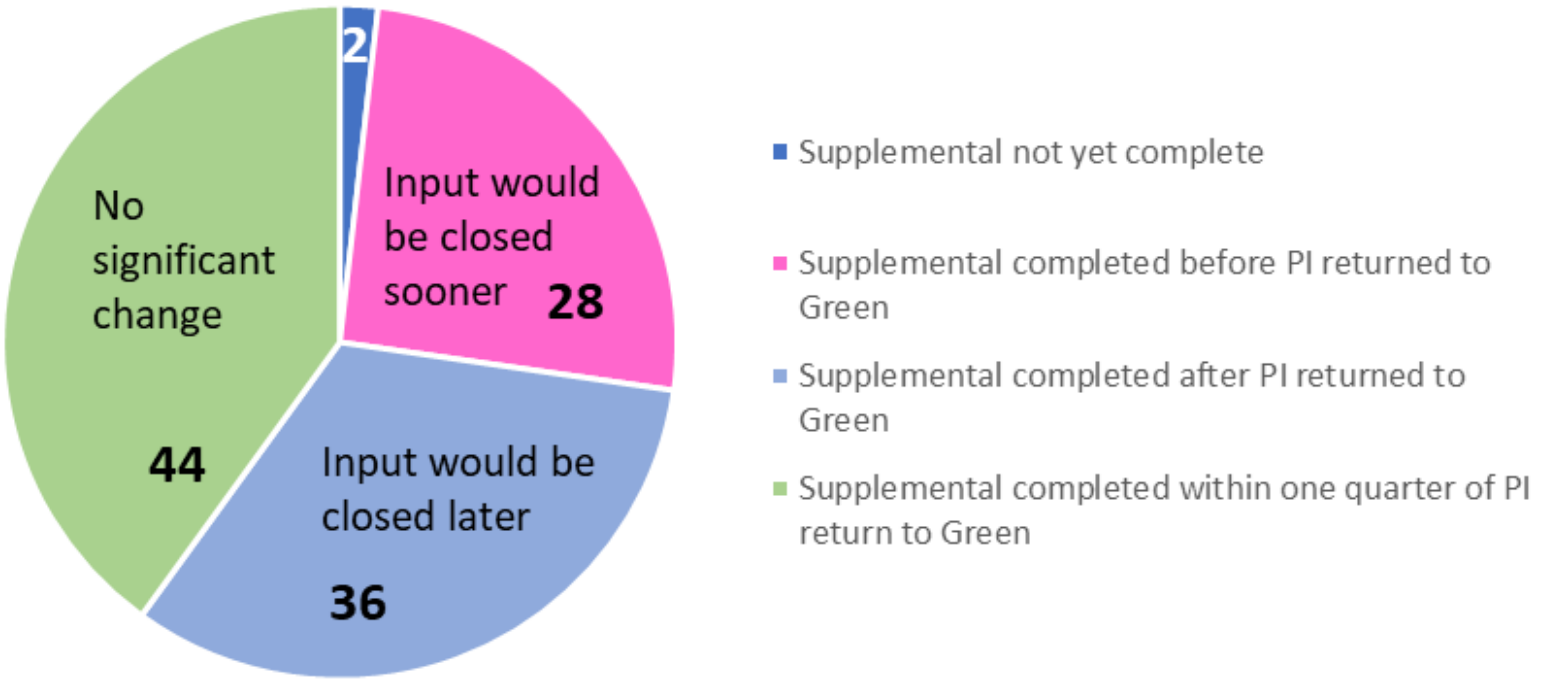
Proposed Treatment of GTG PIs



Conclusion

- Staff believes current treatment of GTG PIs should be enhanced
  - Process does not encourage prompt evaluation, correction, and inspection
  - Regulatory uncertainty due to backdating of parallel findings
  - Delayed performance assessment
  - Data review shows that readiness for PI supplemental inspections lags supplemental inspections for findings

Conclusion

GTG Finding	GTG PI
White finding issued, plant moves to Column 2	White PI reported, parallel finding opened and plant moves to Column 2
White finding remains open assessment input until supplemental inspection completed	Parallel finding remains open assessment input until supplemental inspection completed
Corrective actions completed	Corrective actions completed, PI might return to Green
Supplemental inspection completed • Finding is closed and removed from assessment process • Finding cannot be closed and remains open until future inspection	Supplemental inspection completed • Finding is closed and removed from assessment process, PI hits removed • Finding cannot be closed and remains open until future inspection

Next Steps

- Commission paper votes:
  - Proposal to modify closure of GTG findings to supplemental inspection completion
  - Proposal to modify treatment of GTG PIs
- Staff recommending that both changes be adopted
- If approved, would engage with industry on guidance revisions to accommodate removal of PI hits once inspected and closed

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Questions