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 Reactor Oversight Process Enhancement Initiative

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General Comment

I generally support the initiative supported by the industry to change some of the inspection frequencies at the stations. However, in my experience, the program that the NRC needs to increase its frequency and depth of inspection if they are going to go down this path is that of the Corrective Action Program (CAP). If a station has a strong CAP, with a positive Safety Conscious Work Environment (SCWE) supported by in-depth external self assessments, the NRC may be justified in decreasing some of its oversight in less safety significant areas. The industry is justifiably proud of its record in improved safety performance and that is directly attributable to station employees finding and correcting problems. The NRC must, in my view, tailor its inspection regime to ensure that the CAP is functioning at a high level BEFORE changing the inspection frequencies. It should develop Performance Indicators (PI's) so that it can track performance of the CAP on a recurring basis, and should evaluate its own IP for the P&IR inspection to ensure that the CAP is working well. The frequency of the P&IR may need to be changed to an annual inspection to ensure the effectiveness of the CAP is maintained.

The NRC should ensure that its own processes are adequate to detect and correct any degradation of the CAP, SCWE and assessment quality at stations to ensure they can intervene if needed to protect the health and safety of the public.

Finally, I would advocate rolling any changes out to a smaller subset of stations in each region as a "pilot" program, then evaluate the changes to see if they are effective.