

White Paper Summarizing Substantive Cross-Cutting Issues (pre-2015)
and Cross-Cutting Issues (2015 and beyond) Identified by Staff

As part of the 2019 Reactor Oversight Process (ROP) self-assessment process and the ROP enhancement effort, staff will conduct an effectiveness review of the changes made to the cross-cutting issues (CCI) program that were implemented in 2015 along with a review of the program overall. The ROP CCI program effectiveness review effort is fully described in the team charter, available in the Agencywide Documents Access and Management System as Accession No. ML19179A105. As part of the effectiveness review effort, staff will provide opportunities for public comment on the CCI program that will be considered by the effectiveness review team. The opportunities for public comment will occur at the August and September ROP public meetings. At the July 31 ROP public meeting, staff agreed to make a summary of some supporting data for the effectiveness review public in advance of the effort.

This white paper includes data showing the history of substantive cross-cutting issues (SCCIs) and CCIs that were opened. The CCI program was initially implemented on July 1, 2006, with 27 cross-cutting aspects (CCAs) not including 10 CCAs associated with safety culture that were only used in supplemental inspections. In 2013 the CCAs were revised to align with industry's safety culture language and the Commission's safety culture policy statement, which resulted in a reduction from 27 to 23 CCAs, not counting 12 CCAs associated with safety culture that were reserved for use during supplemental inspections. Exhibit 2 of IMC 0310 contains a cross-reference of how CCAs prior to the common language initiative lined up with CCAs post-implementation of the common language initiative. Up to this point in the program, an SCCI could be opened if four or more findings were identified in an assessment period with a common CCA and the staff had concerns with the licensee's efforts at addressing the issue. A significant change to the CCI program was implemented in 2015 that changed the criteria for cross-cutting themes and replaced SCCIs with CCIs but did not alter the CCAs. At this point a CCI could be opened if six or more findings were identified in three consecutive assessment periods with a common CCA. More detailed discussion of the CCI program and changes is available in the ROP CCI program effectiveness review team charter documents referenced therein.

Enclosure 1 shows all cross-cutting theme thresholds that were exceeded and SCCIs that were opened under program criteria prior to the changes implemented in 2015.

Enclosure 2 shows all cross-cutting themes that were exceeded and CCIs that were opened under the revised cross-cutting program in 2015 and beyond. This enclosure also shows when the pre-2015 cross-cutting theme thresholds would have been exceeded had they continued past 2015.

Enclosure 3 shows SCCI/CCIs opened and cross-cutting theme thresholds exceeded per year.

Substantive Cross-Cutting Issues Prior to 2015 Program Revisions

Bold Text: Substantive Cross-Cutting Issue opened																
Regular Text: Cross-Cutting Theme reached but SCCI not opened																
Region I	EOC 2006	MC 2007	EOC 2007	MC 2008	EOC 2008	MC 2009	EOC 2009	MC 2010	EOC 2010	MC 2011	EOC 2011	MC 2012	EOC 2012	MC 2013	EOC 2013	
Beaver Valley 1 & 2									H.4.a							
Calvert Cliffs 1 & 2																
Fitzpatrick																
GINNA																
Hope Creek							H.4.b									
Indian Point 2&3	H.2.c	H.2.c	H.2.c P.1.d	H.2.c P.1.d												
Limerick 1 & 2													H.4.b			
Millstone 2&3										P.1.d						
Nine Mile Pt 1 & 2													H.2.c			
Oyster Creek	H.4.b									H.2.c	H.2.c					
Peach Bottom 2 & 3																
Pilgrim															P.1.d	
Salem 1 & 2		H.4.b	H.4.b		H.2.c	H.2.c										
Seabrook																
Susquehanna 1 & 2									P.1.c	P.1.c H.2.c	P.1.c H.2.c H.4.a	P.1.c H.2.c	P.1.c			
TMI																
Vermont Yankee																

Substantive Cross-Cutting Issues Prior to 2015 Program Revisions

Region II	EOC 2006	MC 2007	EOC 2007	MC 2008	EOC 2008	MC 2009	EOC 2009	MC 2010	EOC 2010	MC 2011	EOC 2011	MC 2012	EOC 2012	MC 2013	EOC 2013
Browns Ferry 1, 2, 3			P.1.d	P.1.d	P.1.d		P.1.c	P.1.c	P.1.c P.1.d	P.1.c P.1.d H.4.b	P.1.c P.1.d	P.1.c P.1.d H.2.c	P.1.c P.1.d H.2.c	H.2.c H.3.b	H.3.b H.4.b P.1.c
Brunswick 1 & 2							H.2.c								
Catawba 1 & 2															
Crystal River 3															
Farley 1 & 2							H.4.b	H.4.b							
Harris 1															
Hatch 1 & 2															
McGuire 1 & 2															
North Anna 1 & 2				H.2.c				H.2.c							
Oconee 1, 2, 3									H.4.b	H.4.b	H.1.b	H.1.b			
Robinson 2									H.2.c	H.2.c	H.2.c H.1b H.2.b	H.1.b H.2.b	H.4.b		
St Lucie 1 & 2								H.2.c	P.1.d						
Sequoyah 1 & 2															
Summer															
Surry 1 & 2															
Turkey Point 3 & 4	P.1.c	P.1.c	P.1.c P.1.d												
Vogtle 1 & 2															
Watts Bar								H.2.c	H.2.c H.4.b					H.4.c	

Substantive Cross-Cutting Issues Prior to 2015 Program Revisions

Region III	EOC 2006	MC 2007	EOC 2007	MC 2008	EOC 2008	MC 2009	EOC 2009	MC 2010	EOC 2010	MC 2011	EOC 2011	MC 2012	EOC 2012	MC 2013	EOC 2013
Braidwood 1& 2						H.1.b	H.1.b			H.1.b	H.1.b	H.1.b		P.1.c	
Byron 1 & 2				H.1.b	H.1.b										H.4.a
Clinton															
Davis Besse									H.4.c		H.2.c				
DC Cook 1 & 2															
Dresden 2 & 3							H.4.a H.4.b								
Duane Arnold												H.1.a			
Fermi			H.2.c H.4.b	H.2.c H.4.b				H.2.c	H.2.c						
Kewaunee	H.2.c H.4.b P.1.c	H.2.c H.4.b P.1.c	H.2.c H.4.b P.1.c												
Lasalle 1 & 2															
Monticello					H.2.c H.4.c	H.2.c H.4.c	H.4.b	P.1.c							H.2.c
Palisades		P.1.c	H.4.a	H.4.a	H.2.c	H.2.c H.3.a				H.1.b H.2.c	H.1.b H.2.c H.4.c	H.1.b H.4.c	H.4.c		
Perry			H.3.a	H.3.a	H.2.c H.3.a H.4.a	H.2.c H.3.a H.4.a H.4.c P.1.c	H.3.a H.4.a H.4.c P.1.c	H.3.a	H.2.c H.3.a	H.2.c H.3.a	H.2.c H.1.b				
Point Beach 1 & 2		H.2.a H.2.c	H.2.a H.2.c P.1.d	H.1.b H.2.c P.1.d	H.2.c P.1.d										

Substantive Cross-Cutting Issues Prior to 2015 Program Revisions

Prairie Island 1 & 2						H.1.a H.1.b H.2.c H.4.b	H.1.a H.1.b H.2.c H.4.b	H.1.a H.2.c H.4.b				H.1.b	H.1.b		
Quad Cities 1 & 2		H.2.c	H.2.c												

Substantive Cross-Cutting Issues Prior to 2015 Program Revisions

Region IV	EOC 2006	MC 2007	EOC 2007	MC 2008	EOC 2008	MC 2009	EOC 2009	MC 2010	EOC 2010	MC 2011	EOC 2011	MC 2012	EOC 2012	MC 2013	EOC 2013
ANO 1 & 2			H.1.b	H.1.b H.2.c			P.1.c		H.1.b H.4.c	H.1.b H.4.c	H.1.b	H.1.b			
Callaway	P.1.c	P.1.c													
Columbia											H.4.a	H.1.a H.4.a		H.2.c	P.1.d
Comanche Peak 1 & 2											H.2.c				
Cooper	H.4.b	H.2.c	H.2.c				H.4.a H.1.b	H.4.a	H.1.b	H.1.b H.4.a P.1.c	P.1.c H.4.a	P.1.c H.1.b H.2.c H.4.c	P.1.c H.1.b H.2.c	P.1.c H.1.b H.2.c	H.4.b
Diablo Canyon 1 & 2							P.1.c	P.1.c H.1.b P.1.a	P.1.c H.1.b	P.1.c H.1.b		H.1.b	H.1.b		
Fort Calhoun	H.4.a	H.2.c H.4.a	H.2.c H.4.a	H.2.c H.4.a					H.2.c			H.1.a P.1.c	H.1.a H.1.b H.2.c P.1.c	H.1.b H.2.c P.1.a P.1.c P.1.d	H.1.b H.2.c H.3.b P.1.a P.1.d
Grand Gulf			H.1.b												
Palo Verde 1, 2, 3	H.1.a H.2.c H.4.a H.4.b P.1.c P.1.d	H.1.a H.1.b H.2.c H.4.a H.4.b P.1.a P.1.c P.1.d	H.1.a H.1.b H.2.c H.3.a H.4.a H.4.b P.1.a P.1.c P.2.b	H.1.a H.1.b H.3.a H.4.a H.4.b P.1.c P.1.d P.2.b	H.2.a P.1.c		P.1.c								
River Bend	H.2.c H.4.a P.1.a	H.4.a													

Substantive Cross-Cutting Issues Prior to 2015 Program Revisions

San Onofre 2 & 3			H.2.c P.1.c	H.2.c P.1.c	H.2.c H.4.a P.1.c	H.1.b H.2.c H.4.a P.1.c	H.1.b H.2.c H.4.a H.4.c P.1.a P.1.c P.1.d	H.1.b H.2.c H.4.a H.4.b H.4.c P.1.a P.1.c P.1.d	H.1.b H.2.c H.4.a H.4.b H.4.c	H.1.b					
South Texas 1 & 2															
Waterford														P.1.c	H.2.c
Wolf Creek			H.4.a H.4.b	H.2.c P.1.a P.1.c P.1.d	H.2.c P.1.a P.1.c P.1.d	P.1.c	P.1.c H.1.b	P.1.c P.1.d	H.2.c P.1.c P.1.d	H.1.b H.2.b H.2.c P.1.a P.1.c P.1.d	H.1.b H.2.c H.3.b P.1.a P.1.c P.1.d	H.1.b H.2.c P.1.c P.1.d	H.1.b H.2.c P.1.c P.1.d		H.2.a

Bold Text: Cross-Cutting Issue (CCI) opened Regular Text: New Cross-Cutting Theme thresholds reached but CCI not opened Italic Text: Old Cross-Cutting Theme thresholds reached								
	2015 MC	2015 EOC	2016 MC	2016 EOC	2017 MC	2017 EOC	2018 MC	2018 EOC
Browns Ferry			<i>H.8 (4)</i>	<i>H.8 (4)</i>		<i>H.12 (4)</i>		
Callaway			<i>H.14 (4)</i>					
Clinton			<i>H.1 (4)</i> <i>H.14 (4)</i>	HU (20)		HU (22) <i>H.1 (4)</i> <i>H.5 (5)</i>	<i>H.5 (4)</i>	
Columbia					<i>H.12 (4)</i>	<i>H.12 (4)</i>		
Comanche Peak			<i>P.2 (4)</i>					
Cooper						<i>P.2 (5)</i>	<i>H.3 (4)</i>	
Diablo Canyon	<i>H.5 (4)</i>							
Fermi				<i>P.2 (4)</i>				
Ft Calhoun	HU (28) PIR (12) <i>H.5 (4)</i> <i>H.6(4)</i> H.14 (7) P.2 (7)	HU (21) <i>H.3 (4)</i>						
Grand Gulf		<i>H.12 (5)</i>		<i>H.7 (4)</i>			<i>H.5 (4)</i> <i>H.12 (4)</i> <i>H.13 (5)</i>	HU (20) <i>H.5 (4)</i> <i>H.12 (5)</i> <i>H.13 (5)</i>
Millstone					<i>P.3 (4)</i>			
Pilgrim		PIR (13) <i>H.8 (4)</i> <i>P.1 (4)</i> <i>P.2 (5)</i> <i>P.3 (4)</i>	<i>P.2 (4)</i> <i>P.3 (5)</i>		HU (22) H.8 (6) <i>H.14 (5)</i> <i>P.2 (4)</i>	PIR (13) <i>H.8 (5)</i> P.2 (8) <i>P.3 (4)</i>	<i>P.2 (5)</i> <i>P.3 (5)</i>	

Cross-Cutting Issues Following 2015 Program Revisions

River Bend		HU (20) <i>H.1 (4)</i>	HU (20) <i>H.1 (4)</i>					
Salem	H.8 (4) P.2 (4)					<i>H.5 (5)</i>	<i>P.2 (4)</i>	
Sequoyah				<i>H.8 (4)</i>				
Summer					<i>P.3 (4)</i>			
Surry		<i>H.7 (4)</i>	<i>H.7 (4)</i>					
Susquehanna		<i>H.12 (5)</i>		<i>H.5 (4)</i>				
Turkey Point	H.1 (5)							
Vogtle							<i>H.1 (5)</i>	
Watts Bar							SCWE	SCWE <i>H.12 (4)</i>
Wolf Creek				<i>H.9 (4)</i> <i>P.5 (4)</i>		S.1 (1)	S.1 (1)	

Substantive Cross-Cutting Issues and Cross-Cutting Themes Over Life of Program

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
SCCIs or CCIs Issued	18	59	51	42	34	33	28	5	-	0	0	0	2
Cross-Cutting Theme Threshold Reached Pre-2015	-	-	-	50	52	56	48	29	-	N/A	N/A	N/A	N/A
Cross-Cutting Theme Threshold Reached 2015 Onward	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-	6	2	6	4
Old Cross-Cutting Theme Threshold Reached 2015 Onward	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-	17	16	16	14

