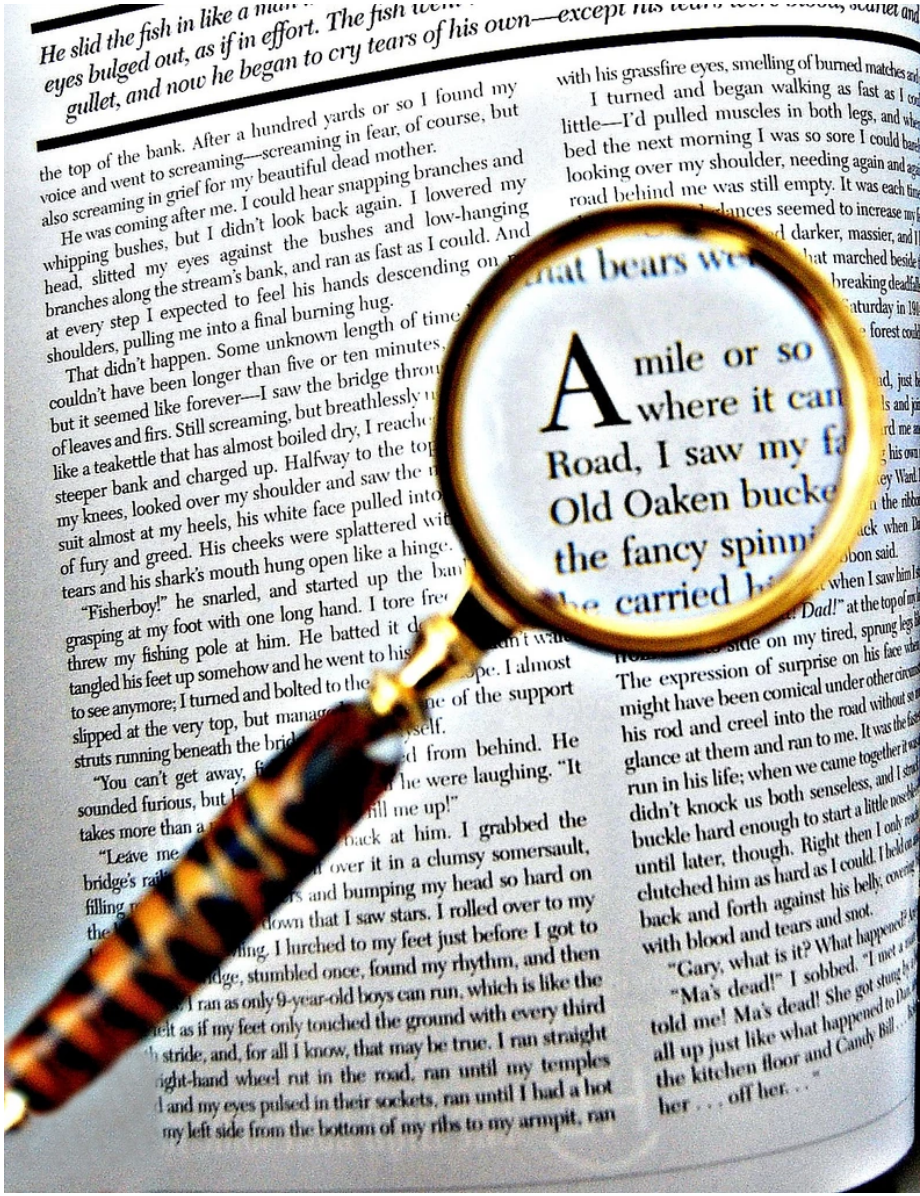
PI&R Comprehensive Review

Ami Agrawal
Thematic Lead

August 28, 2019



Team Composition

SES Sponsor, Acting Deputy Director DIRS	Shakur Walker
Chief, Inspection and Regional Support Branch	Thomas Hipschman
Team Lead	Ami Agrawal
Inspection Procedure 71152 Lead	Ross Telson
Senior Reactor Operations Engineer	Eric Thomas
Reactor Operations Engineer	Jeffrey Bream
Safety Culture Lead	Molly Keefe
Limerick Resident Inspector	Sherlyn Haney (Region 1)
Senior Project Engineer	Ryan Taylor (Region 2)
Quad Cities Resident Inspector	Dan Tesar (Region 3)
Allegations/Enforcement Team Leader	Jeremy Groom (Region 4)
Senior Risk Analyst	Andrew Rosebrook (Region 2)
Senior Emergency Preparedness Specialist	Don Johnson (NSIR)

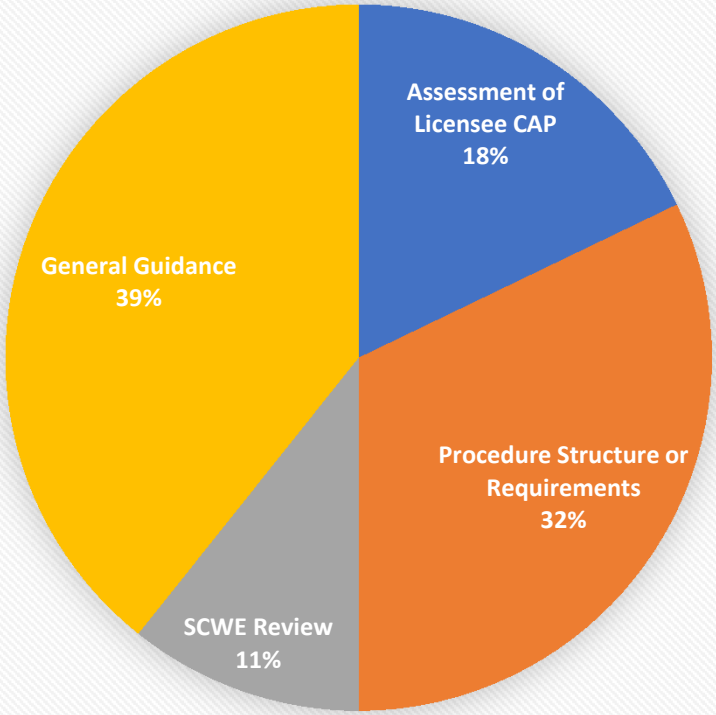
Team Charter Objectives

- Review IP 71152 and IMC 0308 and, its relationship with IP 9500x series and cross-cutting themes (IMC 0310)
- Develop way to ensure consistency in execution and documentation across the regions
- Develop process to review data driven inspection results and integrating these results into the annual End of Cycle (EOC) assessment.
- Develop criteria for inspectors and regional management to use in evaluating health of licensee's PI&R processes and NRC's response when area needing improvement is identified.

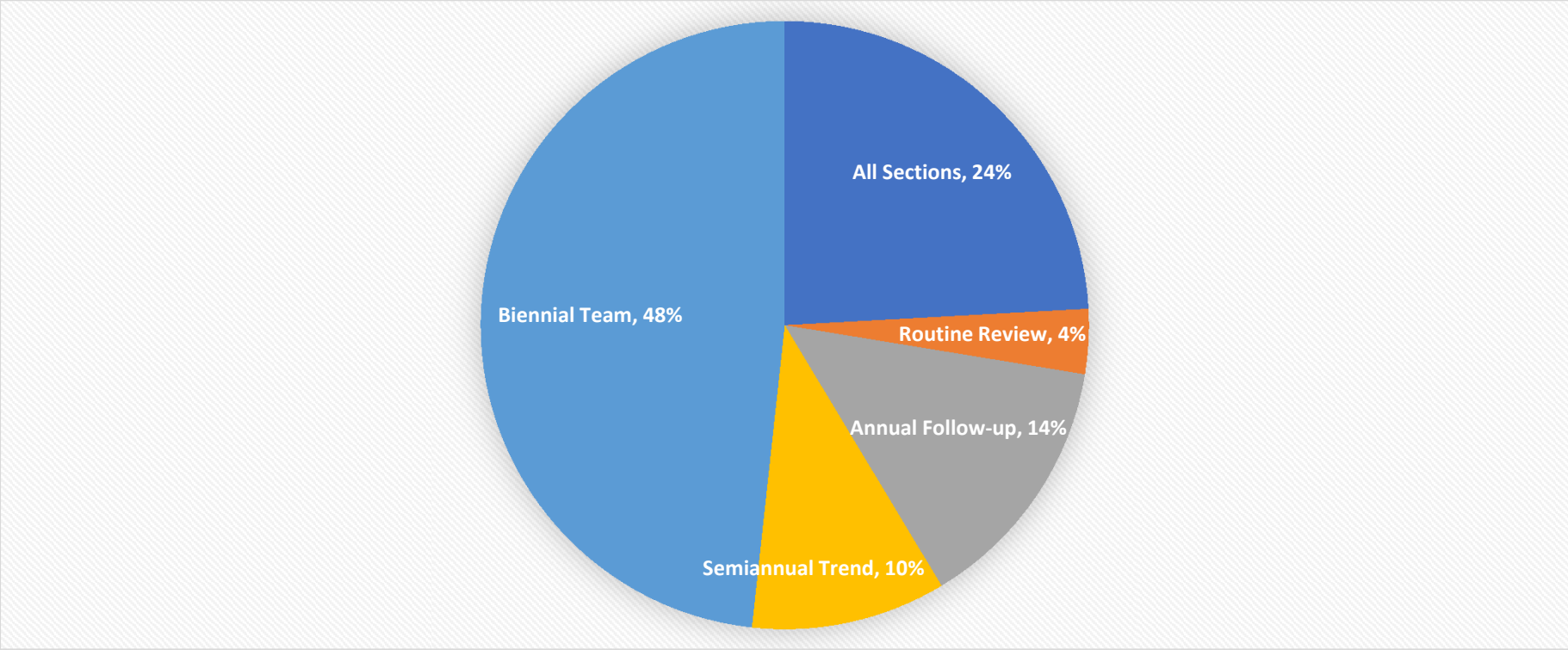
Data considered/reviewed by the Team

- Previous ROP Enhancement effort recommendations
- 95003 Lesson's Learned relating to PI&R
- Feedback forms associated with IP 71152
- Feedback from all the PI&R team leads from all the regions
- Regional management feedback

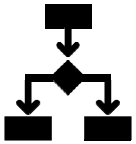
Feedback Form Theme Overview



Feedback Form Procedure Section



What is the team considering?



Procedure structure

Holistic assessment of PI&R

PI&R Program Assessment

Next steps

What is an effective way to organize IP71152?

IP 71152, Problem Identification and Resolution

IP 71152.01, Semiannual Trend Review

IP 71152.02, Annual Follow-up of Selected Samples

IP 71152.03, Licensee Self-Assessment and Operating Experience Programs

IP 71152.04, Licensee Identification, Evaluation, and Resolution of Deficient Conditions

IP 71152.05, Safety Conscious Work Environment

What are proposed impacts of revising the format?

Pros

- Improve ease of use of IP elements
- Improve tracking of inspector resource utilization
- Elimination or minimization of redundant inspection activities
- Provides flexibility in how samples are inspected
- Would provide consistency with other programmatic areas

Cons

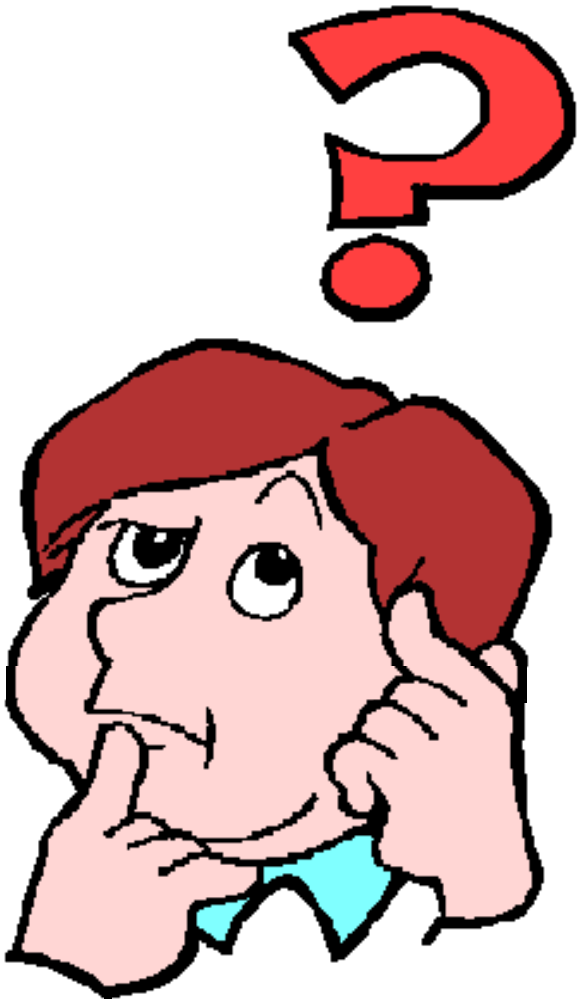
- Increases NRR overhead of procedure maintenance
- Guidance would be split among multiple procedure modules

How is assessment being considered?

- 4 Areas of base assessment
    - Identification of Issues
    - Prioritization and Evaluation of Issues
    - Timely and Effective Corrective Actions
    - Safety Conscious Work Environment

- Utilize RPS reports to facilitate assessment (data-driven).

- Holistic review of the data from RPS and discuss at End-of-Cycle the health of Licensee PI&R program.

So what's next?

- September:
  - Continue developing recommendations
  - Provide update at ROP Public meeting
- October:
  - Team in person meeting to finalize all the recommendations
  - Provide update at ROP Public meeting
- November:
  - Team provide memorandum to DIRS management of all the team recommendations and determine if SECY paper is required
  - Provide update at ROP Public meeting
- Develop Communications plan for internal and external stakeholders