



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

March 6, 2020

MEMORANDUM TO: Michael King, Director
Vogtle Project Office
Office of Nuclear Reactor Regulation

FROM: Victor Hall, Branch Chief /RA/
Vogtle Project Office
Office of Nuclear Reactor Regulation

SUBJECT: CONSTRUCTION REACTOR OVERSIGHT PROCESS
PERFORMANCE METRIC REPORT FOR CALENDAR
YEAR 2019

The Construction Reactor Oversight Process (cROP) self-assessment program evaluates the effectiveness of the cROP through its success in meeting pre-established goals and intended outcomes. The staff evaluates performance metrics to determine the success of the cROP in meeting these goals and outcomes. The staff performed the Calendar Year (CY) 2019 performance metric analysis in accordance with Inspection Manual Chapter (IMC) 2522, "Construction Reactor Oversight Process Self-Assessment Program," dated July 28, 2014, and IMC 2522 Appendix A, "Reactor Oversight Process Self-Assessment Metrics," dated October 4, 2017.

IMC 2522 and its associated appendix describe performance metrics associated with each of four cROP program areas: the inspection program (IP), significance determination process (SDP), assessment (AS) program, and inspections, tests, analyses, and acceptance criteria (ITAAC) program (ITA). The staff designates the program-specific metrics as the IP, SDP, AS, and ITA metrics, respectively. The staff also monitors and analyzes a metric of a more general nature, which is designated as the O metric, to assess the overall performance of the cROP.

Enclosure 1 provides a summary of the metric results and Enclosure 2 provides the detailed report. The staff found that the cROP successfully met all applicable performance metrics by meeting the acceptance criteria defined in IMC 2522 Appendix A. Two metrics were deemed

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not applicable for the CY 2019 self-assessment. These metrics were related to significant events and timeliness of supplemental inspections. There were no significant events in CY 2019, and there were no supplemental inspections.

Enclosures:

1. Self-Assessment Metric Overview
2. Self-Assessment Metric Report

SUBJECT: CONSTRUCTION REACTOR OVERSIGHT PROCESS PERFORMANCE METRIC
REPORT FOR CALENDAR YEAR 2019 DATED: MARCH 6, 2020

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| DATE | 03/5/2020 | 3/5/2020 | 03/5/2020 | 03/6/2020 |

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Calendar Year 2019

cROP Self-Assessment Metric Report

(Enclosures 1 and 2)

SELF-ASSESSMENT METRIC OVERVIEW

INSPECTION PROGRAM METRICS

| | |
|---|--|
| IP1: Inspection Reports are issued within Timeliness Requirements | IP2: NRC's Response to Technical Assistance Requests (TAR) Is Timely |
| Met | Met |

SIGNIFICANCE DETERMINATION PROCESS METRICS

| | |
|--|------------------------------|
| SDP1: SDP Results Are Predictable and Repeatable | SDP2: Appeals of SDP Results |
| Met | Met |

ASSESSMENT PROGRAM METRICS

| | | | |
|---|--|---|---|
| AS1: Deviations from the Construction Action Matrix | AS2: Assessment Program Results Are Completed in a Timely Manner | AS3: Timeliness of Supplemental Inspections | AS4: Degradations in Quality of Construction are Gradual and Allow Adequate Agency Engagement of the Licensee |
| Met | Met | N/A | Met |

ITAAC METRIC

| |
|---|
| ITA1: Analysis of ITAAC Reopened After Closure Verification |
| Met |

OVERALL cROP METRIC

| |
|--|
| O: Analysis of NRC's Responses to Significant Events |
| N/A |

SELF-ASSESSMENT METRIC REPORT

INSPECTION MANUAL CHAPTER 2522 APPENDIX A CONSTRUCTION REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT METRICS

2522A-01 INSPECTION PROGRAM METRICS

IP-1 Inspection Reports are issued within Timeliness Requirements

Met: Yes

Definition: Audit 100% of reactor construction inspection reports issued during the calendar year in relation to the inspection report timeliness requirements in Inspection Manual Chapter (IMC) 0613, "Power Reactor Construction Inspection Reports."

Acceptance Criteria: At least 90% of reactor construction inspection reports issued during the calendar year meet the inspection report timeliness requirements in IMC 0613.

Lead: Office of Nuclear Reactor Regulation (NRR)/Vogtle Project Office (VPO), Region II

Goals Supported: Objective, Risk-Informed, Predictable, Effective, Open

NOTE: For inspections not conducted by a resident inspector, inspection completion is normally defined as the day of the final exit meeting. For resident inspector and integrated inspection reports, inspection completion is normally defined as the last day covered by the inspection report.

Analysis: All reactor construction inspection reports issued during calendar year (CY) 2019 met the timeliness requirements in IMC 0613.

IP-2 NRC's Response to Technical Assistance Requests (TAR) Is Timely

Met: Yes

Definition: Audit 100% of TARs completed in the calendar year in relation to the TAR timeliness requirements in NRO Office Instruction NRO-COM-108, "NRO Construction Inspection Interfaces with Region II."

Acceptance Criteria: At least 90% of TARs are closed during the calendar year by the due date agreed upon by the requester within TAR timeliness goals outlined in NRO-COM-108.

Lead: NRR/VPO

Goals Supported: Objective, Risk-Informed, Understandable, Open, Effective

Analysis: All TARs closed in CY 2019 were closed in accordance with the timeliness requirements specified in NRO-COM-108.

2522A-02 SIGNIFICANCE DETERMINATION PROCESS (SDP) METRICS

SDP-1 SDP Results Are Predictable and Repeatable

Met: Yes

Definition: Audit 100% of construction inspection program inspection findings issued during the calendar year against the significance determination process in IMC 2519, "Construction Significance Determination Process," and its appendices.

Acceptance Criteria: If greater than 10 findings were issued during the calendar year, then at least 90% of them contain adequate detail to enable an independent auditor to trace through the significance determination process in IMC 2519 and its appendices and reach the same significance color characterization.

If 10 or fewer findings were issued during the calendar year, then no more than 1 of them did not contain adequate detail to enable an independent auditor to trace through the significance determination process in IMC 2519 and its appendices and reach the same significance color characterization.

Lead: Region II, NRR/VPO

Goals Supported: Risk-Informed, Predictable

Analysis: There were three findings documented in CY 2019 and reviewed via independent audit. All findings contained adequate detail to enable the independent auditor, using Inspection IMC 2519 and appendices, to trace through the significance determination process for the findings and reach the same finding color characterization.

| | |
|-----------------------------|--|
| SDP-2 | <u>Appeals of SDP Results</u> |
| <u>Met:</u> | Yes |
| <u>Definition:</u> | Track the total number of appeals of final SDP results during the calendar year. |
| <u>Acceptance Criteria:</u> | Zero appeals of SDP significance that result in a final determination being overturned during the calendar year. |
| <u>Lead:</u> | Region II, NRR/VPO |
| <u>Goals Supported:</u> | Risk-Informed, Objective, Predictable, Understandable, Open |
| <u>Assessment:</u> | There were no appeals of final SDP results during CY 2019. |

2522A-03 ASSESSMENT PROGRAM METRICS

AS-1 Deviations from the Construction Action Matrix

Met: Yes

Definition: Audit all assessment-related letters during the calendar year and count the number of deviations from the Construction Action Matrix.

Acceptance Criteria: Zero deviations from the Construction Action Matrix during the calendar year.

Lead: NRR/VPO

Goals Supported: Objective, Risk-Informed, Open

Assessment: There were no deviations from the Construction Action Matrix during CY 2019.

AS-2 Assessment Program Results (Assessment Reviews, Assessment Letters and Public Meetings) Are Completed in a Timely Manner

Met Yes

Definition: Audit 100% of Assessment Reviews, Assessment Letters and Public Meetings issued/conducted during the calendar year in relation to the timeliness requirements in IMC 2505, "Periodic Assessment of Construction Inspection Program Results."

Acceptance Criteria: At least 90% of the timeliness goals for the assessment process are met during the calendar year.

Lead: Region II, NRR/VPO

Goals Supported: Effective, Open, Predictable

Assessment: All Assessment Reviews, Assessment Letters and Public Meetings issued/conducted during CY 2019 met the timeliness requirements in IMC 2505, "Periodic Assessment of Construction Inspection Program Results."

AS-3 Timeliness of Supplemental Inspections

Met: N/A

Definition: Count the number of instances during the calendar year where a finding was held open for more than six months due to the need to complete the supplemental inspection.

Acceptance Criteria: No instances during the calendar year when a supplemental inspection has not been completed within six months for which the licensee had indicated they were prepared for the inspection.

Lead: Region II, NRR/VPO

Goals Supported: Effective, Predictable

Assessment: There were no supplemental inspections required during CY 2019.

AS-4 Degradations in Quality of Construction are Gradual and Allow Adequate Agency Engagement of the Licensee

Met: Yes

Definition: Track the number of instances during the calendar year in which a construction site moves more than one column to the right in the Construction Action Matrix.

Acceptance Criteria: No instances during the calendar year in which performance issues cause a construction site to move more than one column to the right in the Construction Action Matrix.

Lead: NRR/VPO

Goals Supported: Risk-Informed, Predictable

Assessment: There were no instances during FY 2019 in which a construction site moved more than one column to the right in the Construction Action Matrix.

2522A-04 ITAAC METRICS

ITA-1 Analysis of ITAAC Reopened After Closure Verification

Met: Yes

Definition: Audit 100% of ITAAC that are reopened after closure verification during the calendar year.

Acceptance Criteria: No ITAAC have been verified as having been met that are reopened during the calendar year because of a deficiency in the process that was within the NRC's ability to identify before closure verification.

Lead: NRR/VPO

Goals Supported: Effective, Risk-Informed

Assessment: There were no ITAAC that were reopened as a result of a deficiency during CY 2019.

2522A-05 OVERALL cROP METRICS

O-1 Analysis of NRC's Responses to Significant Events

Met: N/A

Definition: Review 100% of incident investigation teams (IITs) and augmented inspection teams (AITs) inspection reports that are issued during the calendar year to determine if major programmatic voids were identified during the cROP review portion of IITs and AITs.

Acceptance Criteria: No major programmatic voids are identified during the cROP review portion of IITs and AITs.

Lead: Region II, NRR/VPO

Goals Supported: Effective, Predictable

Assessment: There were no IITs or AITs performed or issued during CY 2019.