



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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March 16, 2021

MEMORANDUM TO: Daniel J. Merzke
Division Reactor Oversight
Office of Nuclear Reactor Regulation

FROM: Christopher G. Miller, Director / **RA** /
Division of Reactor Oversight
Office of Nuclear Reactor
Regulation

SUBJECT: APPROVAL OF CHARTER FOR COMPREHENSIVE
BASELINE INSPECTION PROGRAM REVIEW

This memorandum approves the team charter for the working group tasked with conducting a comprehensive baseline inspection program review as part of the calendar year (CY) 2021 Reactor Oversight Process (ROP) self-assessment. This multi-disciplinary working group, with representation from all four regions and headquarters staff, will review all ROP baseline inspection procedures (IPs) to identify: if any procedures can be changed to address remote performance of some or all parts; potential compensatory or surrogate inspection activities, if any, in lieu of the required elements, that can be credited toward IP completion; best practices for accomplishing inspections, both in person and remotely; and best tools available from NRC or licensees to aid in inspection completion. The team will recommend appropriate revisions to IPs.

Enclosures:

1. Comprehensive Baseline Inspection
Program Review Charter

CONTACT: Daniel J. Merzke, NRR/DRO/IRAB

SUBJECT: APPROVAL OF CHARTER FOR COMPREHENSIVE BASELINE
INSPECTION PROGRAM REVIEW DATED: MARCH 16, 2021

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DATE	03/16/2021	03/8/2021	03/9/2021	03/16/2021

OFFICIAL RECORD

Comprehensive Baseline Inspection Program Review Charter

I. Background

As described in Inspection Manual Chapter (IMC) 0307, Appendix B, "Reactor Oversight Process Self-Assessment Baseline Inspection Program Monitoring and Comprehensive Review," dated May 29, 2020, the staff will conduct a comprehensive baseline inspection program review every fifth year (the year after NRR has completed Reactor Oversight Process (ROP) implementation audits for all four regions). This review will holistically evaluate the entire baseline inspection program. The staff completed the audit for Region IV in Calendar Year (CY) 2020.

In CY 2019, the staff completed a comprehensive review of every baseline inspection procedure as part of the ROP enhancement initiative. The staff made several recommendations to revise inspection procedures (IPs) that were documented in SECY-19-0067, "Recommendations for Enhancing the Reactor Oversight Process," dated June 28, 2019 (Agency Documents Access and Management System (ADAMS) Accession No. ML19070A036).

In late CY 2020, the staff completed a comprehensive review of the impacts to the ROP due to the COVID-19 public health emergency (PHE) and documented the results in a report, "Initial Report on Challenges, Lessons Learned and Best Practices from the 2020 COVID-19 Public Health Emergency; Focus on Regulatory Oversight of Operating Nuclear Reactors," dated January 2021 (ADAMS Accession No. ML20308A389). A 17-member team was established to identify lessons learned and best practices and to make recommendations to improve NRC readiness for future emergencies and non-emergency conditions. Survey results indicated that most resident inspectors believe they could perform certain aspects of their job remotely on a more routine/fixed basis. In the report, the working group recommended an expansion of remote work practices for resident inspectors.

II. Objective

Establish a working group to conduct a limited comprehensive baseline inspection program review with a focus on recommending guidance within IPs to incorporate PHE lessons learned, specifically identifying which elements of IPs can be completed remotely, identifying potential compensatory or surrogate inspection activities, if any, in lieu of the required elements, that can be credited toward IP completion, identifying best practices for accomplishing inspections, both in person and remotely; and identifying best tools available from NRC or licensees to aid in inspection completion.

III. Proposed Action

Establish a working group comprised of members from the NRR's Reactor Inspection Branch (IRIB), the Radiation Protection and Consequence Branch (ARCB), the Office of Nuclear Security and Incident Response (NSIR), and each of the Regional offices. Working group members reviewing reactor safety procedures shall have resident inspector experience, with senior resident inspector experience preferred. Regional members will be expected to brief regional management and staff throughout the review and provide regional feedback to the group for consideration.

The Director, Division of Reactor Oversight (DRO) will assign a Senior Executive Service (SES) sponsor for the baseline inspection program review who will provide oversight, guidance, and assistance with change management and resolving differing views, as requested by the review team.

Considering the experience gained by inspectors in completing the baseline inspection program during the PHE, and to ensure more consistent implementation of remote inspection activities at operating nuclear power plants, the working group will evaluate all baseline IPs focusing on lessons learned during the PHE. The working group will:

- utilize the survey results from the COVID lessons learned effort;
- develop recommendations as to which elements of each IP can be accomplished remotely, and which elements must be accomplished onsite for the IP to be considered complete.
- identify potential compensatory or alternate inspection activities, if any, in lieu of the required elements if circumstances preclude inspectors from being onsite to complete specific required elements of IPs;
- interview inspectors to identify best practices for accomplishing inspections, both in person and remotely; and
- identify best tools available from NRC or licensees to aid in inspection completion.

Once the review is complete and recommendations are developed, the review team will present their results and recommendations to DRO management and branch chiefs, the regional technical support branch chiefs and team leads, and regional DRP/DRS management. Once these presentations are complete and the team has made any necessary adjustments to ensure alignment, the review team will issue a memo documenting the results of the review and any recommendations.

Upon issuance of the memo, the working group will be disbanded.

IV. Projected Timeline

<u>Activity</u>	<u>Month</u>	<u>Lead</u>	<u>Participants</u>
Identify working group members	Mid-February	BIPR Team Lead	
Alignment meeting	Early March	BIPR Team Lead	DRO management
Issue charter. Commence review.	Early March	BIPR Team Lead	BIPR Team
Communicate with baseline IP leads, regional staff, RIs, DRO staff as necessary to complete review.	March – May	BIPR Team Lead	BIPR Team, others as necessary
Progress review	Early April	BIPR Team Lead	DRO management
Complete review and develop recommendations.	June	BIPR Team Lead	BIPR Team
Present results and recommendations to DRO, DRS, DRP management.	July	BIPR Team Lead	BIPR Team, Division Directors

Address feedback.			
Document conclusions and recommendations in memo to DRO Director. Upon issuance of the memo, the working group will be disbanded.	August	BIPR Team Lead	BIPR Team, IRIB BC, DRO Director
Revise baseline IPs or IMCs, as required, to implement approved recommendations. Larger, longer-term programmatic change recommendations into the ROP lessons learned tracker.	July - December	Assigned Baseline IP leads	-
Identify and conduct training on resulting program changes, if required.	July-December	Assigned Baseline IP Leads	-
Implement revised IPs, as required	Beginning January	Inspectors	-
Provide input for annual ROP Self-Assessment SECY.	January	BIPR Team Lead	-

V. Team Membership

- SES Sponsor – Russell Felts
- Team Lead – Daniel Merzke
- IRIB Members – Doug Bullock, Eric Duncan, Jeff Bream
- ARCB – Ed Stutzcage
- NSIR – Scot Sullivan, Don Johnson
- Region I – Chris Highley
- Region II – Matt Fannon
- Region III – Rob Ruiz
- Region IV – Andrew Siwy

Consult with appropriate IP leads.

VI. Meetings

Team meetings will be scheduled bi-weekly during the review period from March to May. Meeting schedules will be adjusted as necessary.

VII. Time Reporting

All activities will be documented in HRMS using CAC No. A11018