

The purpose of these questions and topics is to spark conversation and uncover lessons learned or potential opportunities for future improvement. As a continually learning organization, it is important for the agency to fully explore the impact of the practices utilized during the COVID-19 public health emergency (PHE) on the ROP in order to make informed decisions regarding what long-term improvements can be made to the ROP for both future emergencies and non-emergency conditions.

Health and Safety of Licensee and NRC Personnel:

Each licensee and each NRC region developed written policies and practices to ensure the health and safety of licensee and NRC personnel was adequately protected throughout the PHE. These policies and practices were revised at various points during the PHE as information was learned and local conditions changed.

- **Was the NRC and industry successful in ensuring that the health and safety of licensee and NRC staff throughout the PHE was adequately protected?**
 - Yes. Good cooperation to protect plant staff and NRC inspectors to reduce COVID risks
 - Industry and NRC had access to data remotely to support elements of inspection preparation and conduct to help reduce COVID risks
 - Based on COVID conditions and emerging “hot spots”, inspection dates were adjusted as needed
 - Combination of on-site social distancing, use of masks, and other state or CDC recommendations, and performing elements of inspection that didn't require onsite presence helped reduce personnel risk
 - Communications and use of other COVID mitigation protocols, e.g., temperature monitoring seemed to be effective
 - Additional station protocols ensure safety of the operators
 - Safety protocols, and use of virtual technology aided in successful completion of refueling outages
 - Efforts to ensure contact tracing were effectively deployed

- **Were the communications and implementation of site and staff protection expectations between licensee and NRC staff appropriate during the planning and performance of onsite inspection activities?**
 - Yes, frequent discussions with NRC regional staff early on
 - Interaction and support of exemption requests when warranted and justified to support COVID mitigation protocols
 - There is an opportunity to update PHE mitigation strategies to be more prepared in the future
 - Upfront discussions with inspection teams on how to complete inspection elements while ensure safety of personnel
 - Communications to resolve conditions where state and CDC guidelines may have conflicted

Prioritization and Performance of Operator Licensing and Safety and Security Inspections:

The NRC determined that operator licensing examinations were mission critical activities. In some cases, Emergency Preparedness inspections were mission essential activities. Some safety and security Reactor Oversight Program (ROP) inspections were rescheduled, inspection sample sizes

were reduced, and some inspections were deferred. The need to prioritize inspections resulted in decision making challenges related to inspection scope and staff travel.

- **Was the NRC and industry successful in developing an effective inspection priority scheme for the activities mentioned above?**
 - Yes, operator license exams recommenced quickly following the initial pandemic response.
 - Some methods of inspection performance needed to be adjusted and developed real time
 - Excellent engagement between the NRC and industry to communicate challenges and when exemptions or delays were warranted.
 - Inspection plans/operator licensing exam strategies were modified during the pandemic to incorporate early lessons learned.
 - Electronic reading rooms were used
 - There was less reliance on US mail/increased use of electronic portals

- **Were the communications, implementation, and overall strategies of decision making related to the above-mentioned activities successfully established and accomplished?**
 - Yes, communications were frequent and engaging throughout and had to consider day to day COVID conditions that could impact operator licensing exams or other inspection related activities.
 - Upfront alignment on use of IT tools for communications, data sharing.

Many inspections relied on a hybrid approach as the PHE evolved. Resident and regional inspectors performed document and record review from remote locations but performed walkdowns and observations onsite. This resulted in less time onsite but inspections that could stretch longer than the traditional one or two weeks.

- **Did this revised inspection approach have a positive or negative impact on licensee and NRC resources?**
 - It was different, mostly positive effects due to the flexibility afforded during the inspection activities.
 - The revised approach allows licensee staff to better support inspections while continuing to meet normal site duties and responsibilities, including corporate staff and program owners. Additionally, more licensee resources can be engaged in inspection support using this approach and virtual technologies. When an inspector/s needed to visit the site, resources could be scheduled and focused to better support that visit.
 - There were some examples where the additional time in between inspection weeks allowed for more questions to be asked in support of data review and inspection activities than previously experience during traditional inspections
 - Control of information/written questions/responses well controlled

- **Did this revised inspection approach have a positive or negative impact on inspection performance?**
 - From the industry's perspective, inspections seemed to be performed effectively
 - the number of violations were consistent with past performance
 - Inspection samples were being completed as planned
 - Communications were occurring between NRC and industry with requests in a timely manner
 - Use of IT and technology paid off during the inspections

Inspector access to licensee information resources:

Resident and regional inspectors were provided access to licensee information resources in varying degrees during the initial and later response to the changing conditions of the public health emergency. For example, some sites provided licensee laptop computers to resident and regional inspectors so licensee information could be accessed from remote locations with minimal licensee interaction. Alternatively, some licensees assigned dedicated staff to provide documentation and records to regional inspectors through file sharing services.

- **Were there significant logistical challenges or advantages to any of the approaches taken by licensees to provide inspectors with inspection and oversight related licensee information resources?**
 - Use of data sharing and information exchange was effective in support of planned inspections
 - In some cases, resident inspectors were issued computers or iPads to better support their daily activities
 - Inspection elements conducted in a hybrid manner were effectively supported including interfacing with station personnel
- **Should the NRC and industry standardize any of the practices implemented in response to the PHE through future Memoranda of Understanding (MOU) revisions?**
 - Potentially, there are different platform and IT tools, network sharing protocols used across the industry so it will be important to understand what things the NRC is considering and how MOUs would be used to achieve mutual benefits.

Long-term Improvements to the ROP:

Many of the practices that were implemented in response to the PHE have already been recognized as improvements.

- **Do you have any suggestions for practices that were adopted out of necessity during the PHE that should be refined and applied going forward?**
 - Use of IT/technology could be leveraged to support hybrid inspection elements that do not require onsite performance such as entrance/exits, document gathering and review, and interactions with plant/corporate staff that have transitioned to hybrid work schedules
 - Attending site meetings or station activities that are now and will continue to be conducted virtually versus in person