POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Brooke P. Clark, Secretary

FROM: Chairman Hanson

SUBJECT: SECY-22-0053: Recommendations for Modifying the Reactor Oversight Process Engineering Inspections Periodicity

Approved X **Disapproved** ____ **Abstain** ____ **Not Participating** ____

COMMENTS: **Below** ____ **Attached** X **None** ____

Christopher T. Hanson

Digitally signed by Christopher T. Hanson
Date: 2022.07.11 11:23:20 -04'00'

Signature
Christopher T. Hanson

Date **07/11/2022**

Entered in STAR
Yes ✓
No ____

Chairman Hanson's Comments on SECY-22-0053: Recommendations for Modifying the Reactor Oversight Process Engineering Inspections Periodicity

Inspections focused on nuclear power plant licensee engineering activities are just one part of the NRC's comprehensive oversight known as the Reactor Oversight Process (ROP). Other elements include ongoing routine oversight by resident inspectors, evaluation of licensee performance indicators (e.g., unplanned scrams, emergency drill/exercise performance), and thorough reviews of a license's effectiveness in finding and resolving problems.

In this paper, the staff proposes to transition from a triennial to quadrennial engineering inspection cycle, comprising one comprehensive engineering team inspection (CETI) and three focused engineering inspections (FEIs). The staff had originally proposed these specific recommendations in SECY-18-0113 based on in-depth analyses and extensive stakeholder interactions. In the current paper, the staff continues to recommend these targeted changes after examining findings and operational experience gathered in the three years since the development of the original paper. I approve the staff's proposal (Option 2).

I have been following the ROP initiatives closely and I appreciate the staff's continuous efforts to review and improve the oversight program. It is important to note that no changes are being proposed in this paper to the routine, ongoing oversight performed by NRC resident inspectors, which is comprised of nominally 1,800 inspection hours per year for a two-unit site. Yet I find that the proposed change to the engineering inspection cycle and the institution of FEIs are logical steps to further improve an already effective engineering inspection program.

The staff notes that the inspection focus today has shifted from verifying the licensee's compliance with the approved original plant design to inspecting the licensee's performance in maintaining equipment to meet design and licensing basis functions. I agree that increasing the inspection cycle length to four years would allow more time for licensees to implement modifications or other safety-significant changes, and thus would broaden opportunities to assess licensee engineering program performance.

I find that the FEIs help focus both NRC and industry resources on current areas of safety and regulatory importance. The FEIs provide more flexibility in selecting engineering inspection areas using operating experience, risk insights, and aging considerations. The FEIs also ensure that an engineering inspection is performed every year at each site to support timely assessment of current licensee performance.

In sum, staff's recommendations are well supported by the experience gained over 21 years of engineering inspections and the maturity of large light water reactor operations and regulatory oversight in general. While the modest reduction in inspection hours could be perceived as a reduction in oversight, I am convinced that the changes proposed by the staff appropriately reorganize and focus inspection resources based on experience.