

**POLICY ISSUE**  
**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Brooke P. Clark, Secretary  
**FROM:** Commissioner Wright  
**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      

**Entered in STAR**

Yes  X   
No      

\_\_\_\_\_  
**Signature**

July 12, 2022

\_\_\_\_\_  
**Date**

## **Commissioner David A. Wright's Comments on SECY-22-0053, "Recommendations for Modifying the Reactor Oversight Process Engineering Inspections Periodicity"**

The Reactor Oversight Process (ROP) was developed with several baseline inspection procedures to provide independent verification that a nuclear power plant's structures, systems, and components are operated, modified, and maintained to perform their intended function during design basis events. Engineering inspections play a critical role in that verification process.

In SECY-18-0113, the staff provided a detailed and systematic assessment of ROP engineering inspections that reflected the staff's high level of engagement and commitment to independent oversight and verification. In August 2021, the Commission approved the staff's request to withdraw that paper in order to examine operational experience gathered in the three years since the development of SECY-18-0113.

I commend the staff for moving forward with implementing the recommendation to shift from the existing framework for engineering inspections to inspections centered on the Comprehensive Engineering Team Inspection (CETI) and Focused Engineering Inspection (FEI) procedures. The proposed CETI will maintain essentially the same amount of inspection activities while eliminating unnecessary, and often very resource intensive, indirect inspection-related and potentially overlapping inspection activities. The FEIs allow the NRC to perform risk-informed inspections of current licensee activities and other engineering areas based on operating experience, risk significance, and the period of time elapsed since an area was last inspected.

Given these inspection changes, the staff recommends increasing the engineering inspection cycle to four years, with one engineering inspection performed each year. The four inspections would include one CETI and three different FEIs over the four-year inspection cycle. I agree with staff that increasing the interval between team inspections should allow more time to implement modifications or other changes to systems that affect high-risk components, and thus will broaden the range of opportunities to assess licensee engineering program performance. This balanced approach should increase the effectiveness of the program by allowing annual inspection touch points to identify potential latent conditions, which is at the heart of engineering inspections. This approach will also allow the staff to address areas in a more risk-informed and flexible manner based on operating experience, risk significance, and lessons learned. These changes will more effectively and deliberately leverage risk insights to better focus the NRC's resources on those areas of greatest safety significance. This shift is critical as the agency recalibrates and moves toward a more safety-focused and risk-informed paradigm. In addition, industry performance over the past two decades of ROP implementation indicates that the change to the inspection cycle length could be implemented without adversely affecting the NRC's ability to independently validate licensee engineering performance.

Based on the staff's thorough assessment and the ability to continue to emphasize current licensee performance and industry challenges while maintaining the NRC's ability to identify latent issues inadvertently introduced by facility changes, I approve the staff's recommended Option 2, to transition to a quadrennial inspection cycle.