

Significance Determination Process Timeliness Review

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*ROP Public Meeting
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Introduction

- [Inspection Manual Chapter \(IMC\) 0307, Appendix A](#) Metric E-3 relates to SDP timeliness

03.03 E-3 SDP Completion Timeliness for Potentially Greater-than-Green Findings

Definition:	The time from the identification date (i.e., the date the issue of concern was brought to the licensee's attention by the NRC, the date the performance deficiency was self-revealed, or the date the licensee documented the condition resulting from the performance deficiency in the corrective action program) to the date a final significance determination is issued for all potentially greater-than-green findings is within 255 days.		
Criteria:	Green ≤ 1 finding not finalized within 255 days	Yellow 2 -3 findings not finalized within 255 days	Red ≥ 4 findings not finalized within 255 days

- **Basis:** This review is considered a program area evaluation as part of the ROP Self-Assessment process. Staff commenced this review in response to two consecutive years of Yellow performance and anticipating CY2022 to also result in Yellow metric performance.
- **Objectives:**
 - Identify any common causal factors affecting SDP timeliness and propose solutions
 - Identify other opportunities for improvements to the SDP with the NRC's [Principles of Good Regulation](#) in mind
- **Team Members:** Dave Aird and Alex Garmoe, NRR/DRO/IRAB

Status and Outreach

- Completed document reviews, data analysis, review of all potentially greater-than-Green findings starting in CY2018
- Presented status at ROP Public Meeting in May (ML22144A257)
- Presented status at ROP Public Meeting in September (ML22269A480)
- Communicated recommendations internally at various counterpart meetings with staff and management

Recommendations

1. Pause the SDP metric clock for findings that are under investigation by NRC's Office of Investigations
 - This is consistent with other agency metrics related to ROP implementation.
2. Improve IFRB guidance ([IMC 0609, Attachment 5](#)) to make it clear that it is inclusive of all ROP cornerstones
 - In general, issues that do not screen to Green should have an IFRB. The objectives of IFRB: alignment on the performance deficiency, discussion on schedule/resources, develop messages to communicate to licensee senior management.
3. Revise sections of the IFRB form and SERP form related to timeliness
 - When conducting the SERP, ensure DRO representative facilitates a discussion on timeliness.
4. Enhance internal SDP tracker to have a “timeliness challenged” category
 - Status of active SDP issues is discussed on a bi-weekly basis with NRC regional and HQ management. This effort will bring a consistent approach to identifying earlier those issues that may challenge the 255-day timeline.
5. Reinforce guidance on best available information
 - The intent is not to broadly restrict the type of information that can be provided by the licensee, but to ensure that the information is made available in a way that supports the established SDP timeline

Next Steps

- Finalize memo by the end of CY2022
 - Publicly available memo will include a summary of the review and a list of recommendations
- Guidance changes in CY2023