



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 26, 2023

MEMORANDUM TO: Michael F. King, Deputy Director
Office of Nuclear Reactor Regulation

FROM: Russell Felts, Director
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

A handwritten signature in blue ink, appearing to read "Russell Felts".

Signed by Felts, Russell
on 01/26/23

SUBJECT: REVISION OF METRIC ON CONTINUITY OF RESIDENT
INSPECTOR/SENIOR RESIDENT INSPECTOR SITE STAFFING

The purpose of this memo is to inform you of a planned revision to one of the Reactor Oversight Process (ROP) self-assessment metrics described in Inspection Manual Chapter 0307 Appendix A, "Reactor Oversight Process Self-Assessment Metrics and Data Trending," dated May 29, 2020 (Agency Documents Access and Management System (ADAMS) Accession No. ML19274C401). In a charter, dated August 11, 2022 (ML22215A061), the Director, Division of Reactor Oversight (DRO) directed the formation of a working group tasked with conducting a review of the ROP metric for continuity of Resident Inspector (RI)/Senior Resident Inspector (SRI) site staffing (metric I-5). The purpose of the review was to review the basis for the current metric and determine if any changes are recommended to revise the metric based on experience with the RI program, including insights from the Davis-Besse Lessons Learned Task Force report (ML022760172).

The working group documented several options and recommendations for revising the metric in a report dated December 13, 2022 (ML22332A460). The recommendations included:

- rename the metric to more accurately describe what is being measured;
- eliminate the six-week minimum rotation length to count towards meeting the metric; reduce it to the minimum for which an SF-50 would be issued, e.g., two weeks; and
- maintain the existing criterion for permanently assigned RIs to be absent a minimum of six weeks before counting against the metric

The current metric originated in 2006 in response to a recommendation from the Davis-Besse Lessons Learned Task Force Report, which stated, "the NRC should establish measurements for resident inspector staffing, including the establishment of program expectations to satisfy minimum staffing levels." Originally the metric only counted permanently assigned resident inspectors with a basis "to evaluate the agency's ability to provide continuity of regulatory oversight." In 2008, the metric was modified to count acting RIs and SRIs assigned to a site for a minimum of six weeks.

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The working group concluded that continuity is disrupted when introducing acting resident inspectors to a site. The Davis-Besse report does not mention continuity; it only recommended measuring resident inspector staffing. The working group recommended renaming the metric “Analysis of Resident Inspector Site Staffing,” which more accurately reflects what the metric is measuring. The purpose of the metric is to ensure there is adequate resident inspector site coverage.

The working group found no documented basis for the six-week minimum requirement for acting resident inspectors to count towards meeting the metric. The most likely basis was that early in the ROP, inspections were broken up into six-week inspection periods. This practice no longer exists for implementing the baseline inspection program. The working group concluded that the length of time an acting resident inspector is assigned to a site shouldn’t matter; if an inspector is filling the role of an RI or SRI, they should count towards meeting the metric. This change to the metric should have no impact on site safety since the regions already backfill resident inspector positions for periods of less than six weeks, based on inspector availability. The goal is to maintain adequate site coverage to the maximum extent possible. One anticipated consequence of eliminating the six-week requirement is that there may be more volunteers willing to backfill resident inspector positions for shorter periods of time.

Finally, the working group recommended retaining the guidance that allows permanently assigned RIs and SRIs to be absent from a site up to six weeks without counting against the metric. This allows permanently assigned inspectors to be able to take leave, participate in training, and to go on rotations to improve their knowledge and skill sets without counting against the metric.

The regions have been briefed on the proposed revisions and have no objections. One concern expressed was that there is a potential delay for regional review and/or response to a safety-significant issue with increased turnover by eliminating the six-week requirement. However, proper turnover with the permanently assigned staff should reduce the probability of this occurring. Since the regions currently backfill resident inspector positions for less than six weeks, this potential has always existed. Regional offices will still have the option to assign a backfill RI or SRI for as long a period as desired. DRO intends to implement these recommendations effective beginning in 2023.

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RESIDENT INSPECTOR SITE STAFFING DATED: JANUARY 26, 2023.

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