POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Brooke P. Clark, Secretary

FROM: Commissioner Crowell

SUBJECT: SECY-22-0087: Recommendation for Problem Identification and Resolution Team Inspection Frequency

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

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

Bradley R. Crowell

Digitally signed by Bradley R. Crowell
Date: 2023.02.14 13:47:03 -05'00'

Signature

Date

Entered in STAR

Yes X

No ____

Commissioner Crowell's Comments on SECY-22-0087, "Recommendation for Problem Identification and Resolution Team Inspection Frequency"

Problem identification and resolution (PI&R) inspections assess the effectiveness of licensees' programs to identify, evaluate, prioritize, and correct problems. As such, PI&R inspections represent a vital element of the NRC's Reactor Oversight Process. Current PI&R inspection activities include baseline PI&R reviews, semiannual trend reviews, annual follow-up of selected issues, and biennial PI&R team inspections. In SECY-22-0087, the staff recommended maintaining the biennial frequency of PI&R team inspections. This follows a multi-disciplinary, multi-office comprehensive review by the staff's PI&R Working Group (PIRWG) that re-examined the basis for the recommendation in SECY-19-0067, which was withdrawn in August 2021, to lower the PI&R team inspection frequency to triennial. The PIRWG found that PI&R remains an effective oversight tool and recommended several enhancements for the PI&R inspection program. The PIRWG "did not conclude whether it would be beneficial to transition the inspection from biennial to triennial." Further, the PIRWG recommended not making substantial changes to the PI&R inspection procedure that could impact such a high number of ROP findings and observations without careful consideration. As a result, the staff recommends that more incremental changes to the procedure are warranted, and the PI&R team inspection frequency only be reconsidered after the incremental changes are completed. In addition, I believe that the growing commercial interest in developing new nuclear power plants must be supported by a strong safety record and public confidence in the current operating fleet. In light of this likely expansion in new nuclear power plants, many of which may utilize non-light water technologies, I do not believe now is the appropriate time to decrease the frequency of key NRC inspection activities. Based on the staff's thorough assessment of the PI&R program, and the importance of conducting regulatory oversight in a way that builds and sustains stakeholder confidence, I approve the recommendation to maintain the biennial frequency of PI&R team inspections (Option 1).

SECY-19-0067 also included options to revise inspection procedures to modify sample sizes and resource estimates for a range of baseline reactor safety inspections. Although revisions to individual inspection procedures would generally not require Commission approval, the staff sought Commission approval in SECY-19-0067 because "these changes, when considered together, would be significant." The staff's proposed revisions affected a variety of inspection procedures and included both increases and reductions in the number of inspection hours. Although many changes included a reasonable basis, the rationale for revising the post-maintenance testing and surveillance testing inspection procedures was less clear. The staff also recommended a reduction of inspection hours for the PI&R biennial team inspection without presenting a strong basis for doing so. Absent a better justification for these significant reductions in inspection effort, the staff should maintain the existing levels of inspection samples and hours for post-maintenance testing, surveillance testing, and PI&R biennial team inspection procedures.