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NUCLEAR ENERGY INSTITUTE

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Mr. Russell N. Felts
Director, Division of Reactor Oversight
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

Project Number: 689

Subject: Comments on the U.S. Nuclear Regulatory Commission's Safety Culture Program Effectiveness Review

Dear Mr. Felts:

The Nuclear Energy Institute (NEI)[1], on behalf of its members, is writing regarding the NRC staff report on results of the recent safety culture program effectiveness review, provided in a memorandum to you dated March 20, 2023.[2] The staff provided a briefing on this report during the April 5, 2023, Reactor Oversight Process (ROP) public meeting.[3] During the April 5 discussion of the report, the industry shared concerns with the recommendations and noted that the effectiveness review did not include solicitation of feedback from external stakeholders. This letter reiterates our concerns with the implications of the staff's recommendations. In our view, the NRC report does not provide a clear and compelling problem statement, data with a robust analysis, or a sound regulatory basis for adding new requirements to what is already a robust safety culture program.

The nuclear industry recognizes the importance of maintaining a healthy nuclear safety culture. As detailed in the enclosure, there is a comprehensive set of activities undertaken by the industry and the Institute of Nuclear Power Operations (INPO) to foster and maintain a healthy nuclear safety culture at operating nuclear plants. As the NRC's Safety Culture Policy Statement makes clear, "Individuals and

[1] The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

[2] NRC Memorandum from Philip J. McKenna to Russel (sic) Felts, "Results of the Safety Culture Program Effectiveness Review", March 20, 2023, ADAMS Accession No. ML22340A452.

[3] Details on the April 5, 2023, ROP public meeting are available at https://www.nrc.gov/pmns/mtg?do=details&Code=20230305. Presentation slides for the staff briefing on the safety culture report are available in ADAMS under accession number ML23082A044.

organizations performing regulated activities bear the primary responsibility for safety and security."[4] Elsewhere in the policy statement, the Commission recognizes the diversity of nuclear organizations and expects "that all individuals and organizations performing or overseeing regulated activities involving nuclear materials, should take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments." [Emphasis added.] In other words, the Commission recognized: (1) the primacy of the licensee in establishing and maintaining its nuclear safety culture and (2) that one-size-does-not-fit-all in safety culture; safety culture monitoring and management must be tailored to local circumstances.

The industry also recognizes that the NRC has statutory responsibility to provide independent oversight of nuclear safety. Indeed, public confidence in nuclear power depends on the NRC's credibility as a strong, independent regulator. In the realm of nuclear safety culture, however, the NRC should refrain from actions that verge on trying to manage the licensee's safety culture. More intrusive NRC oversight of safety culture is not warranted and also risks putting the NRC in the position of managing licensee performance rather than overseeing it.

Numerous and robust means already exist to assess and oversee nuclear safety culture and to identify and correct weaknesses before significant performance degradation occurs. The NRC report acknowledges this yet calls for more intrusive assessments of safety culture based on speculation that this might make a difference. The nuclear industry's strong safety performance is indicative of its strong safety culture and that the industry's and NRC's robust safety culture monitoring efforts have been effective.

Detailed comments on the report are provided in the attachment.

If you have any questions, please contact me at txr@nei.org or (202) 739-8137.

Sincerely,

Timothy Riti

Attachment

[4] "Final Safety Culture Policy Statement," 76 FR 114, June 14, 2011, pages 34773-34778.

Attachment

NEI Comments on the Report of the Safety Culture Program Effectiveness Review

Following are the NEI comments on the report of the NRC staff's "Safety Culture Program Effectiveness Review"[5] (the Review), released March 20, 2023, and discussed in a public briefing on April 5, 2023.[6] The NEI comments are primarily on the staff's three recommendations presented in the March 20 report. The three recommendations are reproduced below for easy reference.

Recommendations in the Staff Report

1. *"Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," and Inspection Procedure (IP) 95001, "Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs," should be updated to allow for an independent NRC evaluation of safety culture for Column 2 plants if the circumstances warrant. This would not necessarily constitute requiring the licensees to perform an independent third-party safety culture assessment. It would provide for independent NRC consideration of the need for sampling and assessing safety culture.*

2. *Improve the training available to inspectors to better meet Commission objectives stated in SRM-SECY-04-0111. (Note that steps are already in process that will support this recommendation, as NRR has a User Need open with RES to enhance training on safety culture based on review of ongoing inspector feedback and projected workload needs.)*

3. *IP 93100, "Safety-Conscious Work Environment Issue of Concern Followup," should be revised to cover all aspects of safety culture, in addition to Safety Conscious Work Environment (SCWE). This will provide the NRC with a tool that can be used for following up on safety culture concerns to encourage meaningful action before licensees are assessed in Column 3. Options for implementing recommendation 3:*

    a. *IP 71152, "Problem Identification and Resolution (PI&R)," review of specific safety culture attributes should be expanded with a reference to the revised IP 93100 to provide guidance for a more comprehensive review of safety culture as necessary. Considerations already factored into resource allocations for PI&R inspections, including review of data trends and inspector observations, should add consideration for including a qualified safety culture assessor on the team if warranted. The team estimates that this option would be essentially resource neutral.*

    b. *Adjustments should be made to the existing inspection framework to allow for safety culture assessment when indicated using the revised IP 93100 procedure. This would leave IP 93100 as an IMC 2515, Appendix C, "Special and Infrequently Performed Inspections," procedure, available for use at Regional Administrator discretion using criteria to be developed separately if this option is chosen. (The effectiveness of previous NRC management discussions with*

[5] NRC Memorandum from Philip J. McKenna to Russel (sic) Felts, "Results of the Safety Culture Program Effectiveness Review", March 20, 2023, ADAMS Accession No. ML22340A452.

[6] Details on the April 5, 2023, ROP public meeting are available at https://www.nrc.gov/pmns/mtg?do=details&Code=20230305. Presentation slides for the staff briefing on the safety culture report are available under ADAMS accession number ML23082A044.

licensees based on quarterly trend reviews discussed in IMC 0305 may be one criterion for consideration). IP 93800, "Augmented Inspection Team," and IP 93812, "Special Inspection," should be updated to reference the revised IP 93100 and consideration of including a qualified safety culture assessor on the inspection team, as well as to emphasize the importance of reviewing safety culture attributes as within scope of the fact-finding purpose of the inspection, to better align the use of these procedures with the intent of changes initiated in response to the original Commission direction.

c. *A regular safety culture assessment, based on the revised IP 93100, should be included as part of the baseline inspection program on a tri-/biennial basis. This could be performed through a graded assessment, allotting more or less resources depending on safety culture/SCWE related data amassed throughout the inspection cycle. This may require additional inspection resources beyond what is currently allocated, approximately 4-5 (which could include team members who are training to be qualified) team members on site for a week gives an estimate of 60-80 inspection hours. Although SRM-SECY-04-0111 specifically decided against a baseline inspection option for safety culture in lieu of the current approach, this effectiveness review finds that the cross-cutting issues program that was developed instead has not been able to fully meet the stated objectives of the program."*

NEI General Comments

1. **Comprehensive Approach to Safety Culture**: The NRC's Safety Culture Policy Statement[7] states that licensees bear primary responsibility for safety and security. This means that licensees also bear primary responsibility for maintaining the nuclear safety culture of their facilities. Discussion of NRC oversight of safety culture in the Review report should acknowledge the many means used by the industry and the Institute of Nuclear Power Operations (INPO) to foster and maintain a healthy nuclear safety culture at operating nuclear plants. These include the following:

   Industry

   - **Comprehensive nuclear safety culture assessments**. Industry voluntarily performs these biennial assessments as required by INPO SOER 02-04.[8] In addition, NEI 09-07, Revision 1[9], provides guidance for licensees to monitor safety culture on an ongoing basis.

   - **Performance Trend Meetings**. Licensees routinely review department-level and sitewide performance trends to identify areas for improvement. Discussions of nuclear safety culture are a key element of these meetings.

[7] NRC Final Safety Culture Policy Statement, 76 FR 114, pages 34773-34778, June 14, 2011.

[8] Institute of Nuclear Power Operations (INPO), Significant Operating Experience Report (SOER) 02-4, Rev.1, "Reactor Pressure Vessel Head Degradation at Davis-Besse Nuclear Power Station", January 27, 2006.

[9] NEI 09-07, "Fostering a Healthy Nuclear Safety Culture", Revision 1, March 2014, ADAMS 14143A085.

- **Corrective Action Program (CAP) Review Meetings**. Licensees hold daily and other periodic meetings to review CAP entries and trends. These provide frequent opportunities to raise and discuss safety culture implications of CAP trends.

- **CAP Root Cause Evaluations**. Licensee CAP procedures specify when to perform a root cause evaluation, e.g., for significant conditions adverse to quality. As warranted by circumstances, root cause evaluations may include a review to determine if any nuclear safety culture aspects caused or contributed to the undesired condition.

- **Executive Nuclear Safety Culture Reviews**. Licensee senior leadership reviews nuclear safety culture regularly. These meetings include, as applicable, a review of employee survey results, NRC allegations, employee concerns program and human resources program themes, and other significant nuclear safety culture information.

- **Nuclear Safety Review Board (NSRB) Reviews**. Licensees utilize a panel of experts to provide independent, external oversight of nuclear safety, including the site and company nuclear safety culture.

- **Employee Concerns Program (ECP) insights**. Licensees regularly review issues being worked by the ECP. Such reviews include, as appropriate, consideration of nuclear safety culture implications of employee concerns and what is learned from them.

- **Insights from NRC Allegations**. Licensees interacting with the NRC on allegations about the licensee's facilities gain insight on potential performance and cultural implications of those allegations. The NRC and licensee investigation of allegations thus gives both NRC and the licensee insights on the health of the licensee's organization.

- **Review of NRC cross-cutting issues**. Like the NRC, licensees routinely review cross-cutting issues associated with inspection findings. Licensees do their own reviews of cross-cutting issue trends to find insights on nuclear safety culture at their facilities.

- **Policies, procedures, training, and communications**. Licensees reinforce principles of a healthy nuclear safety culture through policies, procedures, onboarding and recurring training, and site and company communications.

INPO

INPO examines nuclear safety culture as part of WANO-Atlanta Center (WANO-AC) peer reviews and Performance Continuum activities. The Performance Continuum integrates the operations of performance-based evaluations, accreditation team visits, and station and corporate monitoring into one continuous operation. INPO/WANO-AC personnel monitor station and corporate performance, including nuclear safety culture, using all available data and information including station and corporate performance metrics, operating experience reports, other performance information, observations during station and corporate visits, and other interactions with station and corporate personnel. In addition, comprehensive reviews of nuclear

safety culture are conducted as part of periodic Continuum Site Visits and WANO-AC Peer Reviews. These nuclear safety culture reviews are documented and presented to site and corporate leadership, including the company's Chief Nuclear Officer and Chief Executive Officer.

2. **Recommendations 1 and 3 Represent a Significant Change in Approach**: Recommendations 1 and 3 are significant ROP and safety culture changes which go beyond communication and education and would involve notable differences in the level of industry or NRC effort. Specifically, recommendation 1 involves a significant change to ROP-related safety culture activities for plants in Column 2 of the ROP Action Matrix and could significantly increase the level of industry and NRC effort if the NRC elects to perform an independent safety culture evaluation for a plant in Column 2. Further, recommendation 3 involves a significant change to ROP-related safety culture activities for all plants and would significantly increase the level of industry and NRC effort if the NRC moves forward with direct inspection/assessment of safety culture.

Recommendation 1

3. **Recommendation 1 Would Contradict the Principles of Graded Response and Objectivity:** Recommendation 1 calls for allowing an independent safety culture evaluation for Column 2 plants "…if the circumstances warrant."[10] This recommendation is inconsistent with the premise that the supplemental inspection program facilitates graduated regulatory oversight, becoming more intrusive and diagnostic with the significance and breadth of performance issues that move licensees to higher columns of the Action Matrix.[11] If implemented, recommendation 1 would impose a Column 3 response on a plant in Column 2.[12] It would thus represent a disproportionate NRC response to the one or two White (low safety significance) issues that put the plant in Column 2.

   In addition, the phrase, "if the circumstances warrant," adds subjectivity that is contrary to the objectivity and predictability intended for the ROP. As described in IMC-0308, the ROP "…was to provide tools for inspecting and assessing licensee performance and enforcing NRC requirements in a manner that was more risk-informed, objective, predictable, and understandable…".[13]

   Additionally, recommendation 1 does not appropriately consider what is already adequately addressed in IP 95001. The IP 95001 inspection procedure already requires the NRC staff to determine whether the licensee's root cause, extent of condition, and extent of cause evaluations

[10] See page 10 of Enclosure to NRC Memorandum from Philip J. McKenna to Russel [sic] Felts, "Results of the Safety Culture Program Effectiveness Review", March 20, 2023, ADAMS Accession No. ML22340A452.

[11] Inspection Manual Chapter 2515, Appendix B, September 28, 2022, ADAMS ML22189A170.

[12] According to IP 95001, the NRC estimates that the supplemental inspection for a plant in Column 2 requires between 16 and 40 hours for one White issue and 80-120 hours for two White issues. An independent safety culture evaluation on top of that would require much greater hours (i.e., a level currently associated only with a plant in Columns 3 or 4).

[13] NRC Inspection Manual Chapter 0308, Reactor Oversight Process Basis Document, Issued October 4, 2022, ADAMS ML22125A164, Section 05.01.a.

appropriately considered the safety culture traits in NUREG-2165.[14] The procedure includes a staff review of the licensee's causal evaluation to ensure it properly evaluated whether a weakness in any safety culture component was a root cause or significant contributing cause of the performance issues. It also includes staff review of corrective actions. In instances where the NRC does not believe that the licensee's causal evaluation adequately addressed safety culture contributors to the performance issues, the staff already has clear authority to conclude that the licensee's evaluation is inadequate and not close the Greater-than-Green input. Given the existing comprehensive nature of the staff's IP 95001 inspections and the existing authority to act when inadequacies are identified in the licensee's causal evaluation, there is no sound regulatory basis for recommendation 1.

4. **Safety Culture <u>Was</u> Considered**: On page 4 of the Enclosure to the effectiveness evaluation report, the staff states that the evaluation of changing the threshold for Column 3 in 2015[15] did not consider the impact of that change on safety culture oversight. In our view, SECY-15-0108 clearly conveys that the staff "*carefully considered all aspects of the matter.*" The effectiveness evaluation team report also acknowledges on page 4 that some staff and management expressed a differing perspective "*that the risk-informed decision in 2015 to change the threshold of licensee performance to enter Column 3 appropriately changed the threshold for all significant oversight actions, including the determination of the need for a specific evaluation of the licensee's Safety Culture, to occur at 3 white findings instead of 2 consistent with Commission direction in SRM-04-0111."* The staff also added to IP 95001 an NRC review of a licensee's common cause analysis completed as a result of two White inputs in the same cornerstone. As clearly conveyed in SECY-15-0108, the staff recognized that, *"Given the potential for programmatic weaknesses that may be revealed by two White inputs in the same cornerstone, this revision would increase the likelihood of the NRC identifying potentially broader licensee performance issues."* The Commission specifically approved the addition of the staff review of the licensee common cause analysis to IP 95001 in the Staff Requirements Memorandum for SECY-15-0108. The staff's supporting documentation for recommendation 1 does not appropriately reflect the rigor associated with the ROP changes outlined in SECY-15-0108, as well as the rigor and comprehensiveness included in the existing IP 95001 safety culture guidance associated with licensee causal analyses and common cause evaluations.

   Finally, SECY-15-0108 also describes the external stakeholder inputs considered in the NRC's evaluation including the safety culture aspects of the ROP change and the collective reviews when multiple White inputs are received (formerly done only in IP 95002). This description further supports the conclusion that the NRC staff <u>did</u> consider safety culture when making the ROP changes described in SECY-15-0108.

5. **Implications of Recommendation 1:** Finally, recommendation 1 is inconsistent with the NRC's ROP Enhancement Project discussed in SECY-15-0108 and is likely to further motivate licensees to

[14] See IP 95001, Section 02.03.e. The NUREG mentioned is NUREG-2165, "Safety Culture Common Language," dated March 2014, available at https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr2165/index.html

[15] SECY-15-0108, "Recommendation to Revise the Definition of Degraded Cornerstone as Used in the Reactor Oversight Process," August 28, 2015, ADAMS ML15076A066.

challenge “preliminary White” findings aggressively. SECY-15-0108 accurately described the regulatory risks associated with transitioning from Column 2 to Column 3 of the Action Matrix and the resulting licensee incentives to challenge preliminary White findings. Recommendation 1 would introduce additional subjectivity, unpredictability, regulatory risk, and unnecessary regulatory burden to the ROP process by introducing an independent NRC evaluation of safety culture for Column 2 plants “if the circumstances warrant.” Thus, recommendation 1 is inconsistent with ROP goals and the Principles of Good Regulation and is not aligned with the tenet of the ROP to focus industry and NRC staff resources on the more safety significant issues.

Recommendation 2

6. **Improve Training Available to Inspectors:** While the team report concluded that the assignment of cross-cutting aspects to inspection findings under the ROP provides an effective mechanism for identifying potential safety culture weaknesses and inspectors are aware of the process and employ it consistently, there is a recommendation for additional training to help inspectors better understand the impacts of safety culture on a wider scope of inspection activities. The team report considered feedback from inspectors that had additional safety culture training to support safety culture assessor qualifications and their ability to recognize developing safety culture issues to engage licensees in discussion before more significant concerns emerged. Additional training, if applied using a systematic approach, is an effective tool to increase knowledge and skills and to help maintain proficiency and should be considered if knowledge gaps exist or there is a recognized benefit to help inspectors meet NRC objectives.

Recommendation 3

7. **Encouraging Licensee Action Before Degradation Occurs:** Recommendation 3 provides options to increase inspection of safety culture to “encourage action before significant performance degradation occurs.” Yet the report repeatedly notes that the assignment of cross-cutting aspects to inspection findings under the ROP provides the NRC an effective mechanism for identifying potential safety culture weaknesses. Despite the staff’s conclusions that the ROP is effective in identifying potential safety culture weaknesses, recommendation 3 would significantly expand the NRC’s inspection and assessment of safety culture.

   The NRC staff safety culture program effectiveness review includes the following conclusions:

   A. *“The assignment of cross-cutting aspects to inspection findings under the ROP provides an effective mechanism for identifying potential safety culture weaknesses.”* [Enclosure, page 13, emphasis added.]

   B. *“As for plants in the Licensee Response and Regulatory Response Columns (Columns 1 & 2) of the Action Matrix, inspection activities, and in particular the assignment of cross-cutting aspects to inspection findings, have allowed NRC staff to identify licensees with potential safety culture weaknesses, but the program has been challenged in some cases to encourage appropriate actions, before Action Matrix movement occurs.”* [Enclosure, page 3, emphasis added.]

C. *"The existence of safety culture oversight within the ROP has likely prompted licensees to identify safety culture issues early and take action that they might not otherwise have taken, thereby avoiding further degradation of safety performance, though it is impossible to measure this quantitatively."* [Enclosure, page 19, emphasis added]

D. *"The Cross-Cutting Issue program provides a process to inform licensees that the NRC has a concern with the licensee's performance with respect to safety culture attributes under the cross-cutting areas **and** encourage the licensee to take appropriate actions before more significant issues emerge."* [Enclosure, page 11, emphasis added]

E. *"It is notable that across 15 years of implementing the cross-cutting issues program, the fraction of findings assigned a cross-cutting aspect has remained remarkably stable, as shown in Figure 2. This indicates that inspectors in general have a good understanding of the program and its intent; that they are able to identify safety culture issues with respect to their impact on performance deficiencies; and it validates the premise of the cross-cutting issue program as one means of identifying potential safety culture weaknesses, even when cross-cutting issues are not actually assessed."* [Enclosure, page 12, emphasis added]

F. *"For plants in Columns 1 and 2, this effectiveness review concludes that oversight of safety culture in the ROP is…*

    1. *Effective as a source of information for identifying developing safety culture weaknesses,*

    2. *Partially effective at encouraging action before significant performance degradation occurs."* [Enclosure, page 20]

Despite the staff's positive conclusions that the current ROP is effective in identifying potential or developing safety culture weaknesses, recommendation 3 is almost exclusively focused on expanding the NRC's inspection and assessment of safety culture even for plants in Columns 1 and 2. Such an expansion of NRC inspection and assessment of safety culture lacks merit given the staff's own conclusions, and is inconsistent with the goals of the ROP to be objective, risk-informed, and predictable. This recommendation is based in part on using Greater-than-Green as the threshold for "significant degradation." This effectively eliminates the graded approach in nuclear safety culture oversight, and does not provide an objective, transparent, or predictable process that considers industry performance and risk insights.

The staff's portrayal of increased safety culture inspection as the last resort or most effective means to arrest performance declines belies the many more ways in which NRC feedback influences licensee performance on an ongoing basis. Observations and questions presented by the resident or regional inspectors are taken seriously by licensees and are acted on promptly. In addition, NRC written and oral feedback during periodic regulatory performance review meetings, inspection exit meetings, inspection reports, trend reviews, etc., offer opportunities to influence licensee performance. Furthermore, the NRC has access to INPO reports, adding a diverse perspective to

the NRC staff's view of licensee performance and safety culture and the basis for giving feedback to the licensee.

8. **Precedent:** Recommendation 3 in the effectiveness evaluation report appears to be inconsistent with staff recommendations and Commission direction in SECY-04-0111[16] and the related SRM.[17] In SECY-04-0111, the staff presented option 3A to develop an inspection process that would provide instruction on systematically assessing safety culture and result in additional agency actions if safety culture issues were identified. However, the staff recommended that the Commission not support this option because, *"the ROP is based on assessing performance deficiencies in an objective manner through the significance determination process*" and *"the nature of assessing Safety Culture by direct inspection requires some measure of subjective judgment*." The staff went on to state, *"Presently the goals of the ROP are to be objective, risk informed, and predictable. The subjective nature of assessing Safety Culture by direct inspection may detract from meeting these goals."* As noted, the staff did not support the option of assessing safety culture by direct inspection and the Commission agreed with the staff and disapproved Option 3A in the related SRM. Recommendation 3 appears to revisit this direction as it advocates for assessing safety culture by direct inspection via such mechanisms as IP 71152, "Problem Identification and Resolution," and IP 93100, "Safety-Conscious Work Environment Issue of Concern Follow-up."

   Additionally, in the SRM for SECY-04-0111, the Commission directed the staff to only enhance inspection activities related to safety culture for plants in Column 3, Degraded Cornerstone Column. Recommendation 1 would impose additional NRC inspection activities related to safety culture on plants in Column 2, and recommendation 3 would impose additional NRC inspection activities related to safety culture on plants in Columns 1 and 2. Thus, Staff recommendations 1 and 3 also appear to be inconsistent with the Commission direction to focus on safety culture for plants in Column 3 and would introduce subjectivity, unpredictability, unnecessary regulatory burden, and potential regional inconsistencies contrary to the ROP framework.

Alternative Recommendation 3

9. **Revise Existing Assessment Guidance to Prompt NRC Management Discussions with Licensees:** The effectiveness review report notes that an alternative recommendation was proposed which leverages the existing IMC-0305 quarterly ROP trend reviews of licensee performance. It would revise existing assessment guidance to prompt NRC management discussions with licensees on any safety culture aspects discussed during the quarterly reviews to encourage licensee action to address safety culture aspects before significant performance degradation occurs. It is also noted that this approach would not require additional inspection or

[16] SECY-04-0111, "Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture," July 1, 2004, ADAMS ML041750238.

[17] SRM-SECY-04-0111, "Staff Requirements - SECY-04-0111 – Recommended Staff Actions Regarding Agency Guidance in the Areas Of Safety Conscious Work Environment and Safety Culture." August 30, 2004, available at https://www.nrc.gov/reading-rm/doc-collections/commission/srm/2004/2004-0111srm.pdf.

significant additional resources consistent with the graded approach in SRM-04-0111 for licensees in Column 1 or Column 2 of the ROP Action Matrix.

This alternative recommendation appears to reflect a recognition of the value of NRC's interactions with licensees to help shape performance and culture. While this option seems more aligned with a graded approach to oversight and the Principles of Good Regulation, the report only mentions this alternative and does not discuss it further or disposition it. Moreover, since this recommendation has not been fully developed, the industry can't definitively assess the impact and fully understand how this proposal compares to the other recommendations that encourage increased inspection and assessment of safety culture.