



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

June 10, 2025

MEMORANDUM TO: Philip McKenna, Deputy Director
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

FROM: Brian Benney, Reactor Operations Engineer *Brian Benney*
Generic Communications and Operating Experience Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS
BI-MONTHLY PUBLIC MEETING HELD ON JUNE 5, 2025

On June 5, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force executives, senior industry executives, and external stakeholders to discuss the staff's progress on initiatives related to the ROP. The meeting notice and agenda are located at [ML25153A006](#).

ADVANCE Act Discussion

Section 507 of the Act requires the NRC to develop and submit to the appropriate committees of Congress a report that identifies specific improvements to the nuclear reactor and materials oversight and inspection programs carried out pursuant to the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.) that the Commission may implement to maximize the efficiency of such programs through, where appropriate, the use of risk-informed, performance-based procedures, expanded incorporation of information technologies, and staff training. Key language in Section 507 includes optimizing resource use, revising inspection planning, evaluating the cross-cutting issues program, and aligning resource allocation with safety significance and licensee performance.

During the meeting, the NRC shared several updates, including the training provided to inspectors at the regional inspector counterparts meeting (summarized below), and focused on implementation activities, and the timeline for submitting the Section 507 report to Congress. A public workshop to support the review and development of revised ROP performance indicators (PIs) was held immediately following this meeting. The PI Workshop will have a separate public meeting summary.

ADVANCE Act Changes

The NRC staff provided a summary of the agency's response to Section 507 of the ADVANCE Act and discussed the provided NRC inspector training on Reactor Oversight Process (ROP)

revisions. Some revisions require Commission notification and a 14-day waiting period; the ROP Revision SECY (SECY-25-0045) was submitted to the Commission on June 5, 2025.

The staff is working towards a full re-baselining of the ROP, beginning with a comprehensive review of Performance Indicators (PIs). A working group was formed in May 2025, with public workshops underway and the re-baselining work expected to begin in August. The effort includes evaluation of current PIs, adding new PIs to replace targeted direct inspection, reassessing how PIs factor into the action matrix, and revising baseline inspections. Major changes will require Commission approval, with the goal of implementing the revised ROP by January 1, 2027.

Implementation – Inspection Samples

Beginning July 1, inspectors are no longer expected to inspect to nominal sample sizes for inspection procedures. Increases above minimum samples may be warranted based on risk significance, licensee performance, or the scope of work being replaced. Decisions are made by the Senior Resident Inspector or Team Lead, or by the Branch Chief (BC) for solo inspections. BC approval is still required to exceed maximums. Additionally, entrance meetings are now optional and brief, while exit meetings can be conducted remotely and streamlined to minimize resource use. These meeting changes are effective immediately.

Team Inspections

Team inspections are shifting to one week onsite and one week remote, except for Comprehensive Engineering Team Inspection (CETI) inspections. The onsite week will focus on walkdowns, observations, and interactions with licensee staff, while the second week will be conducted remotely. Limited onsite presence during the second week can be accomplished but should be minimized. Exit meetings will be remote. This change will be phased in through December 2025, with the IMC 2515 revision issued by July 1.

CETI Inspections

The CETI is being reduced from seven to six staff members. Inspection Procedure 71111.21M is being revised to reflect a reduced sample range with a lower resource estimate. One CETI has already been successfully completed with six personnel.

Dual Path Processing Revision

The dual path processing guidance for traditional enforcement (TE) violations has been revised in IMC 0612 Appendix B, issued on May 27, 2025. Originally developed in response to high-profile cases where agency action was delayed pending Office of Investigation investigations, the dual path allowed parallel ROP processing. Under the new revision, dual path processing will no longer be used for findings that screen to Green. For Greater-than-Green (GTG) findings, the decision to proceed through the ROP will be made prior to the Enforcement Panel.

Review and Closure of LERs

The review and closure process for Licensee Event Reports (LERs) is being revised to reduce redundant inspection efforts. Under the proposed changes to IP 71153, events already

inspected under another inspection procedure (IP) do not need to be re-inspected solely to close the LER. Instead, the LER should be reviewed for accuracy and closed in the integrated inspection report, with only review time charged. This aligns with the ADVANCE Act's goal of eliminating duplicative or unnecessary activities. The proposed revision will be issued for a 30-day internal comment period in about two weeks.

Preparation and Documentation Requests

The guidance on inspection preparation and documentation requests is being clarified to reduce unnecessary burden on licensees. Boilerplate document requests are no longer acceptable, and per IMC 0620, requests must be reasonable and avoid duplicating documents already in ADAMS. Team leads are expected to tailor and send requests in advance, with Branch Chiefs now required to review initial requests. Inspectors should also use "The Library" on ROP Digital City for Final Safety Analysis Reports (FSARs) and Technical Specifications, which is maintained by Site Administrative Assistants.

Very Low Safety Significance Issue Resolution Changes

The VLSSIR (Very Low Safety Significance Issue Resolution) process has been expanded to apply to open questions involving ambiguity in the licensing basis, design basis, regulatory requirements, or self-imposed standards. Updated guidance emphasizes when to use the process based on resource considerations and is now included across oversight program IMCs. IMCs 0611, 0612, and 0612 Appendix B were updated on May 27, 2025, with new definitions, templates, and screening instructions. Inspectors are expected to consider VLSSIR throughout the inspection process and to revisit open issues weekly with their Branch Chief to evaluate VLSSIR applicability.

Inspection Manual Chapter Changes

Recent updates to several Inspection Manual Chapters (IMCs) reflect changes discussed in this training. Key revisions include updated guidance on entrance and exit meetings, inspecting to minimum sample sizes, and optimizing travel in IMC 2515 and its Appendices A and D. IMCs 0611, 0612, and 0612 Appendix B have been revised to include expanded VLSSIR guidance. IMC 0308 Attachment 2 also now emphasizes minimum sample inspections.

Next Steps

Next steps for the ROP include completing the revision of Performance Indicators and holding workshops with industry, while also considering integration of data already used by industry for performance monitoring, as well as inspector feedback. Starting around August 2025, the re-baselining of all baseline inspection procedures will begin, leading to changes in inspection samples. Additional efforts include improving efficiency in 4-part write-ups in the documenting Green and SL-IV violations by limiting text entry fields in RPS, with implementation targeted for January 1, 2026.

The ROP Revision SECY informs the Commission of staff actions and requests approval for several recommendations. These include changes to the assessment program to exclude licensee-identified White findings from Action Matrix inputs, prevent escalation based on multiple White findings, and not conducting the Commission Agency Action Review Meeting unless the Management Directive 8.14 criteria are met. The staff also proposes simplifying the Cross-Cutting Issues Program by elevating the characterization from the current 23 aspects to

the three areas and eliminating the requirement for each NRC region to develop one initial operator licensing exam per year.

FAQ 25-01

NRC received FAQ 25-01 during the March ROP Public Meeting (<https://www.nrc.gov/pmns/mtg?do=details&Code=20250264>). NRC Staff reviewed the FAQ using the event description provided in the licensee's 4th quarter 2023 integrated inspection report, dated Feb 13, 2024 (ML24043A263). In summary, while a licensee operator was manipulating a mechanical system, a pressure transient occurred which resulted in unexpected flow of contaminated filter media and unexpected radiological conditions. The NRC inspectors concluded that the event was the result of a deficiency in a licensee procedure. At the time of the system manipulation, the licensee had in place radiological controls commensurate with radiation area doses, as defined in 10 CFR Part 20. When the pressure transient occurred, dose rates exceeding the criteria for locked high radiation areas were present without the commensurate controls. The NRC Staff concluded that this event met the definition in the Performance Indicator guidance document, NEI 99-07, Rev 7, (ML13261A116) for a Technical Specification High Radiation Area (>1 rem per hour) Occurrence. Specifically, the licensee failed to exercise radiological control over access to technical specification high radiation areas and the failed to exercise radiological control over work activities. As it pertains to PI reporting, the licensee has no further action because the reporting period for this event has elapsed, and the report would not have resulted in a > Green PI input to the ROP Action Matrix. There is an unresolved inspection item regarding this issue (ML25031A060) which NRC Region II will be able to disposition once the FAQ is finalized.

The Next ROP Meeting

The next ROP bi-monthly public meeting is tentatively scheduled for July 23, 2025.

Communicating with the NRC Staff

At the start of all ROP public meetings, the project manager provides contact information for the public to use to provide their name and affiliation as a participant in the meeting. This contact information is also provided for submitting questions and comments to the NRC staff. Please note that any questions and/or comments pertaining to the ROP can be sent to Mr. Brian Benney at Brian.Benney@nrc.gov. The "Contact Us about ROP" page on the ROP public website can also be used to submit questions and comments regarding the ROP (<https://www.nrc.gov/reactors/operating/oversight/contactus.html>).

Conclusion

The industry representatives expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views. The NRC management stressed the importance of the NRC being focused on providing reasonable assurance of public health and safety when considering changes to the ROP.

The enclosure provides the attendance list for this meeting.

Enclosure:
As stated

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC MEETING HELD ON JUNE 5, 2025 - DATED JUNE 10, 2025

ADAMS Accession No.: ML25161A088

***via email**

OFFICE	NRR/DRO/IOEB/BC	NRR/DRO/DD
NAME	BBenney	PMcKenna
DATE	6/10/2025	6/10/2025

OFFICIAL RECORD COPY

LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC MEETING

June 5, 2025 - 9:00 AM to 10:30 AM

NAME	Organization ¹
Aaron McCraw	NRC
Alan Konkak	NRC
Alex Garmoe	NRC
Amanda Mivanyi	NRC
Amy Chamberlain	Southern Nuclear
Andrew Mauer	NEI
Andrew Zach	EPW
Aron Lewin	NRC
Balla Barro	NRC
Bill Rautzen	NRC
Brian Benney	NRC
Brian Yip	NRC
Carlos Sisco	Winston and Strawn
Charles Murray	NRC
Christopher Riedl	Unknown
Dan Geary	NRC
Daniel Daszkiewicz	NRC
Daniel Ju	NRC
David Garmon	NRC
Deann Raleigh	Curtiss-Wright
Desiree Davis	NRC
Don Wong	NRC
Doug Bollock	NRC
Dwayne Myal	NRC
Edwin Lyman	UCS
Elias Haddad	NRC
Emma Duncan	NRC
Enrique Melendez Asensio	Unknown
Gabe Taylor	NRC
Garielle Schreier	GE Verona
Heather Jones	NRC
Ian Bitner	Unknown
Jack Bell	NRC

¹ Unknown organization indicates that the participant's affiliation was not provided by the issuance of this meeting summary.

Jack Bell	NRC
James Gaslevic	NRC
Jason Schussler	NRC
Jazmin Flores	NRC
Jeff Rady	NRC
Jerimiah Rey	NRC
Jesse Brown	Constellation Nuclear
Joel Jenkins	NRC
John Gidden	Entergy
John Jarrell	Certrec
Jonathan Fiske	NRC
Josh Rhodes	NRC
Joy Jiang	The Breakthrough Institute
Justin Hassler	NRC
Justin Knowles	Constellation Nuclear
Lauren Helstosky	Unknown
Linda Dewhirst	Unknown
Luis Betancourt	NRC
Maribel Valdez	NextEra
Martin Phalen	SBC Global
Matthew Humberstone	NRC
Melisa Krick	Unknown
Micheal Smith	NRC
Naeem Iqbal	NRC
Odunayo Ayegbusi	NRC
Peter Lom	NRC
Phil Lashley	Vistra Corp
Phil McKenna	NRC
Rama Ponangi	Unknown
Richard Mogavero	Unknown
Rob Burg	EPM, Inc.
Robin Ritzman	Curtiss-Wright
Rodney Fanner	NRC
Russell Felts	NRC
Sam Sayampanathan	NRC
Sarah Cole	Unknown
Sarah Obadina	NRC
Shawn Lichvar	NRC
Steven Pope	Unknown
Tim Barvitskie	NRC
Tim Marshall	NRC

Tim Riti	NEI
Tony Zimmerman	Duke Energy
Trace Orf	Unknown
Valerie Marshall	Unknown
Yilia Vega Claudio	NRC