



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

December 5, 2025

MEMORANDUM TO: Philip McKenna, Acting 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
REBASELINING PUBLIC MEETING HELD ON OCTOBER 21, 2025

On October 21, 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 [ML25290A332](#).

More Than Minor Screening Updates

A significant portion of the discussion centered on the More-than-Minor (MTM) Issue Screening Criteria. The current process, which relies on subjective criteria, has led to inconsistencies in documented findings. To address this, the NRC proposed relocating the MTM criteria from Inspection Manual Chapter (IMC) 0612 to IMC 0609, which is already a familiar and more objective tool within the issue screening process. This change aims to reduce subjectivity, improve consistency, and streamline the determination process. The proposed revisions would eliminate the examples in Appendix E of IMC 0612 and introduce cornerstone-specific questions to replace the broader criteria. As a result, many findings currently classified as Green may be reclassified as Minor, particularly those involving minor degradation or calculational errors that do not impact operability or functionality. These changes will be pending Commission upon submission of the ROP Baseline Inspection Program revision SECY. If approved, the revision is expected to be implemented in 2026.

During the discussion, the industry asked how the details in the examples currently in appendix E would be used and captured for future reference. The staff stated the information in the examples is being considered when developing the criteria that will be used for IMC 0612 appendices and may keep the information available as a reference.

Engineering Inspection Procedure

The meeting also introduced a new proposed engineering inspection procedure (IP), IP 71111.21A, which references several existing procedures such as those for power-operated valves (POV), environmental qualification (EQ), and commercial grade dedication (CGD). This new IP would require approval from the Commission in the proposed ROP Baseline Inspection Program revision SECY. This new IP is designed to be flexible and tailored to the specific systems, structures, and components (SSCs) being inspected. It will be conducted by a two- to three-member team, including a resident inspector. The inspection can be completed in two consecutive weeks or in separate weeks, depending on the selected samples. The procedure emphasizes assessing engineering performance in maintaining SSCs' design basis functions, defense-in-depth capabilities, and alignment with probabilistic risk assessments (PRAs).

Major proposed updates to the engineering inspection program were discussed, including:

- Transition to an annual engineering inspection sample, with 175 hours of effort allocated per site using 2 to 3 staff resources, with flexibility for sample selection and scheduling.
- Inspections would reference previous inspection procedures for specific guidance on inspecting systems, structures and components and with specifics included in the inspection plan.
- Regions would begin planning and communicating with licensees 180 to 120 days prior to the first onsite day of the inspection.
- The NRC shared the inspection objectives of the new draft engineering inspection procedure.

Industry comments included an interest in having more discussion on the change to engineering inspections to ensure licensees can properly prepare. The NRC plans on sharing the draft of the new engineering inspection procedure by the next ROP monthly meeting in November.

Problem Identification and Resolution Inspection Procedure

The staff discussed the proposed changes to IP 71152, "Problem Identification and Resolution (PI&R)." Specifically, the team inspection is being proposed to be moved to IMC 2515 App C as an infrequently performed inspection. The baseline portion of the inspection will include baseline PI&R reviews, semi-annual trend reviews, and annual followup of selected issues. The number and resource estimate for the annual followup samples was increased from four to seven, with a corresponding increase in inspection hours from 64 to 90. Portions of the team inspection will also be included as optional annual followup samples. In addition, entry criteria were developed for implementation of the team inspection, where the scope and resources used will be defined in a charter approved by the regional administrator.

During the discussion, the industry noted that by having safety conscious work environment (SCWE) as a potential sample during the annual inspection, keeping it in the PI&R follow up inspection that is replacing the team inspection, and maintaining IP 93100 SCWE follow up inspection procedure could be sampled and inspected more often than it is currently today. The staff clarified that that is not the intent of the proposed PI&R inspection revision.

Security Inspection Updates

The security inspection program is undergoing a comprehensive update, with the new proposed inspection procedures introduced to focus on licensee performance and compliance with 10 CFR 73.55. The revised approach eliminates the previous tiered inspection elements and shifts to a system-based sampling methodology. All security inspections are now proposed to be triennial, except for the Security Operational Performance inspection, which will remain annual.

New procedures include IP 71130.15 for operational performance, IP 71130.16 for equipment and training, IP 71130.17 for protective strategy design and implementation, and IP 71130.18 for access authorization and fitness for duty. Resident inspectors will play a more active role in these inspections. These new IPs would require approval from the Commission in the proposed ROP Baseline Inspection Program revision SECY.

Other Proposed ROP Baseline Inspection Program Changes

The overall Baseline Inspection Program is proposed to be revised with five inspection procedures (IPs) being sunset, including those for flood protection, heat exchanger performance, maintenance effectiveness, plant modifications, and performance indicator verification. Important elements from these IPs will move into other Baseline Inspection IPs. These changes are part of a broader effort to consolidate and modernize the ROP inspection framework. Five engineering IPs will be merged into a single new procedure, while twelve IPs will remain in use. This restructuring is expected to reduce the total annualized inspection hours by 37%, with notable reductions across reactor safety, emergency preparedness, radiation protection, and security inspection procedures.

The implementation timeline for these changes includes document development and regional review from September through December 2025, submission of a SECY paper to the Commission, development of a scheduling plan, inspector training, and the official rollout of the revised procedures after the staff receives the staff requirements memo (SRM) from the Commission.

The Next ROP Meeting

The next regularly scheduled ROP bi-monthly public meeting is tentatively scheduled for November 19, 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 REBASELINING
PUBLIC MEETING HELD ON OCTOBER 21, 2025 - DATED DECEMBER 5, 2025

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***via email**

OFFICE	NRR/DRO/IOEB/BC	NRR/DRO/IRIB/BC	NRR/DRO/DD
NAME	BBenney	HJones	PMcKenna
DATE	10/28/2025	12/3/2025	12/5/2025

OFFICIAL RECORD COPY

LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC MEETING

October 21, 2025 - 9:00 AM to Noon

NAME	Organization ¹
Alex Garmoe	NRC
Alex Prada	NRC
April Nguyen	NRC
Aron Lewin	NRC
Bill Rautzen	NRC
Brian Benney	NRC
Brian Sentor	Southern
Brian Yip	NRC
Brice Bickett	NRC
Carlos Sisco	Winston and Strawn
Carrie Seip	Xcel Energy
Casey Smith	NRC
Charity Pantalo	NRC
Cheryl Khan	NRC
Chris Fisher	Cook
Christopher Henderson	NRC
Cindy Rosales-Cooper	NRC
Daniel Buscher	Evergy
David Aird	NRC
David Burke	Holtec
David Garmon	NRC
David Hermann	US Army
David Holman	NRC
Desiree Davis	NRC
Don Johnson	NRC
Douglas Bollock	NRC
Dwayne Myal	NRC
Edwin Lyman	UCS
Elias Haddad	NRC
Eric Brothman	NRC
Eric Riggs	NRC
Eric Schrader	NRC
Erin Carfang	NRC
Gladys Figueroa Toledo	NRC
Heather Jones	NRC
James Morris	PGE
Jasmine Gilliam	NRC
Jason Schussler	NRC

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

Jeff Bream	NRC
Jeff Correll	NRC
Jefferson Clark	NRC
Jeremiah Rey	NRC
Jesse Rollins	NRC
Jo Ambrosini	NRC
John Gewargis	NRC
John Giddens	Entergy
Josh Rhodes	NRC
Joy Jiang	The Breakthrough Institute
Julie Winslow	NRC
Justin Bouknight	Dominion
Justin Wearne	PSEG
Karla Stoedter	NRC
Kenneth Kolaczyk	NRC
Kevin Hsueh	NRC
Larry Sinclair	NRC
Len Cline	NRC
Lewis Csedrik	Balch
Linda Dewhirst	NPPD
Mark Henrion	NRC
Matt Rossi	Constellation
Matthew Hardgrove	NRC
Maureen Conley	NRC
Maurin Scheetz	NRC
Maury Brooks	NRC
Michael Waters	NRC
Michael Whitlock	NEI
Mike McCoppin	NRC
Mike Stafford	NRC
Molly Keefe-Forsyth	NRC
Nadir Chaudhry	NRC
Nicole Good	Stars Alliance
Nik Floyd	NRC
Nikki Warnek	NRC
Odunayo Ayegbusi	NRC
Pat Asendorf	TVA
Peter Boguszewski	NRC
Phil OBryan	NRC
Philip McKenna	NRC
Rebecca Sigmon	NRC
Rob Berg	EPM
Sandra Mendez	NRC
Sarah Obadina	NRC
Shawn Kirven	Stars Alliance
Stephanie Roche Rivera	NRC
Steven Dolley	SPGlobal
Tanvir Siddiky	NRC
Tara Inverso	NRC

Thomas Farina	NRC
Thomas Hartman	NRC
Tim Marshall	NRC
Tim Riti	NEI
William Garrett	Southern