

## RESPONSE SHEET

**COMMENTS:** Below            Attached   X   None           

Date \_\_\_\_\_

**Commissioner Weaver's Comments on SECY-25-0045: Recommendations for Revising the Reactor Oversight Process**

The oversight that NRC provides through the Reactor Oversight Process (ROP) fulfills an essential component of our safety mission, and we must use tools and approaches appropriate for today's industry, not the one that existed at the time the ROP was first implemented. The staff's recommendations in SECY-25-0045, which align with ADVANCE Act Section 507, Executive Order 14300 Section 5(g), and the NRC's Principles of Good Regulation, are steps in that direction and I approve them as noted below.

I agree with Commissioner Nieh that the Commission needs to only be informed of changes to the ROP rather than approve them. Management Directive (MD) 8.13 should be updated to reflect this after Commission direction is provided on the forthcoming ROP enhancements. More broadly, NRC executives need to have the authority to execute the programs under their purview because ownership drives improved accountability and performance with the need for Commission approval being the exception rather than the rule.

- **Assessment Program**

- I approve Option 1 to revise the treatment of licensee-identified White inspection findings as recommended by the staff with the corresponding action identified by the staff to mitigate the 'cons' of this option. This change gives credit to the licensees for proactively identifying and promptly resolving issues, thereby incentivizing them to continue this desired practice.
- I approve Option 2 to revise the Action Matrix criteria so that multiple White inputs in Column 2 do not aggregate to result in assessment in Column 3. The staff's recommendation, supported by data from 2015 to 2024, rebalances oversight such that White findings prompt the appropriate individual responses without automatic escalation. The ROP includes multiple performance monitoring mechanisms, including action matrix deviations, to identify and respond to conditions warranting enhanced oversight.
- I approve Option 3 to suspend the Commission's Agency Action Review Meeting unless a licensee meets the criteria in MD 8.14 with the corresponding actions identified by the staff to mitigate the 'cons' of this option. This change is aligned with a performance-based allocation of the staff's and Commission's attention and resources.

- **Cross-Cutting Issues (CCI) Program**

- I join Commissioners Marzano and Nieh in approving Option 2 to eliminate the cross-cutting aspects and characterize findings by cross-cutting area. Based on the data presented by the staff, this change will reduce the subjectivity involved in assigning and aligning on an appropriate cross-cutting aspect to an inspection finding, an exercise that does not provide a commensurate safety benefit. Cross-cutting areas capture organizational behaviors and are qualitative by design, providing a complement to the readily and meaningfully quantifiable performance indicators. The value of the CCI

program lies in structured qualitative assessments. The return on investment from attempting to quantify the CCI areas is uncertain, and likely, minimal.

- **NRC-Developed Power Reactor Initial Operator Licensing Examinations**
  - I approve Option 1 to modify guidance to shift away from each NRC region preparing at least one power reactor initial operator licensing examination per year. This change appropriately manages staff and licensee resources. Processes are already in place to preserve the NRC's examination writing proficiency and the updated guidance will identify specific situations where the NRC would still write an examination for a facility licensee.