POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Carrie M. Safford, Secretary

FROM: Commissioner Marzano

SUBJECT: SECY-25-0045: Recommendations for Revising the Reactor Oversight Process

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

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

MATTHEW MARZANO
Digitally signed by MATTHEW MARZANO
Date: 2025.10.17 17:45:59 -04'00'

Signature
Matthew J. Marzano

Date

Entered in STAR
Yes X
No ____

Commissioner Marzano's comments on SECY-25-0045: Recommendations for Revising the Reactor Oversight Process

I thank the staff for its thoughtful approach to enhancing the U.S. Nuclear Regulatory Commission's (NRC's) Reactor Oversight Process (ROP) as part of implementing both Section 507(d)(3)(a) of the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 (ADVANCE Act) and Section 5(g) Executive Order 14300, "Ordering Reform of the Nuclear Regulatory Commission." The NRC's ROP remains an important and effective tool to inspect, measure, and assess the safety and security performance of operating commercial nuclear power plants. That being said, I support the staff's efforts to better align the agency's inspection resources with safety and security significance and findings based on 25 years of inspection data. The marked improvement in performance of the U.S. fleet over this period presents an opportunity to credit industry efforts that accounts for the driving factors behind these improvements, rooted in a strong safety culture that embraces the ability to identify and correct low-level issues before they lead to significant safety events. As we endeavor to implement extensive changes to the ROP, we must not allow complacency to undermine this progress and remain focused on foundational safety principles.

This paper recommends certain changes that require Commission decision as well as a number of changes that require Commission notification (as required by MD 8.13) or are noted for Commission awareness only. The following comments focus on those matters for Commission decision; however, the recommendations provided by staff in this paper cannot be viewed in isolation from the broader set of ROP enhancements under development. The cumulative effects of changes to the ROP and their interdependencies must be well understood, therefore I believe it is premature to weigh in on certain elements at this time. As the Commission evaluates the next set of ROP enhancements, it will be important to understand the net impact of changes already approved combined with additional changes being proposed.

Assessment Program

I approve the staff's proposed Options 1 and 3 for enhancing the NRC's Assessment Program. I believe that the staff has sufficient and appropriate means to address potential drawbacks of crediting licensee-identified White findings. As proposed in the SECY, the staff should update inspection manual guidance and utilize appropriate communication channels (e.g., licensee entrance and exit meetings, public meetings, etc.) to clearly define a licensee-identified White finding.

With respect to Option 2 on the aggregation of White findings, while I support the approach to better align inspection findings with safety significance, consideration of this issue in this paper seems premature without a better understanding of the comprehensive changes to the ROP. For one, crediting licensee-identified White findings may substantially reduce the number of White findings to be aggregated such that the current threshold becomes appropriately indicative of degraded performance. Further, I recognize that the broader set of future ROP enhancements may include proposing changes to issue screening criteria and thresholds for inspection findings. The cumulative effects of these changes must be taken into consideration, and I believe the issue of aggregation should be evaluated as part of the staff's concurrent ROP enhancement effort.

Cross-Cutting Issues Program

I approve the staff's proposed Option 2 for the Cross-Cutting Issues program, which involves characterizing inspection findings at the cross-cutting area level. This approach makes a positive step toward focusing resources, promoting inspector objectivity, and better identifying programmatic and cultural issues. At the same time, I join the Chairman and Commissioner Crowell in inviting further

examination of the program to best serve its purpose, given the importance of analyzing cross-cutting areas to detect precursors to significant performance declines within the current and future ROP. As an example, as part of the broader ROP enhancement initiative, the staff should reevaluate the thresholds for identifying a theme or propose a more objective means of assigning a cross-cutting theme. Overall, extensive changes to the ROP are only supportable if an adequate means to detect performance declines remains. The philosophy that a licensee's ability to detect and address even small problems that directly relate to safety is a leading indicator of performance cannot be lost in the larger ROP revision. Therefore, it will be important to monitor broader cross-cutting areas to ensure licensees continue to implement a robust means for identifying and resolving safety issues and sustain high-performance.

NRC-Developed Power Reactor Initial Operator Licensing Examinations

I approve Option 1 to modify the NRC's guidance to shift away from each region preparing at least one power reactor initial operator licensing examination per year. NRC's resources should be focused on the oversight of examination administration and supporting operator examinations as the industry faces workforce challenges and the need to train and qualify new licensed operators. Exam preparation should be limited to an as-needed basis to qualify new NRC staff, when requested by the facility licensee, for new reactor technologies if needed, or if the region has concerns with examination security or quality. I fully endorse the staff's approach to develop and maintain proficiency in examination writing skills using other methods as described.