

POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Carrie M. Safford, Secretary
FROM: Commissioner Crowell
SUBJECT: SECY-25-0045: Recommendations for Revising the Reactor Oversight Process

Approved Disapproved Abstain Not Participating

COMMENTS: Below Attached None

Entered in STAR

Yes

No

Signature

Date 10/09/25

Commissioner Crowell's Comments on SECY-25-0045, "Recommendations for Revising the Reactor Oversight Process"

The Reactor Oversight Process (ROP) is the NRC's program to inspect, measure, and assess the safety and security performance of operating commercial nuclear power plants, and to ensure the owner/operator of a given plant adequately addresses any identified deficiencies in the performance of safety- or security-related components of the plant. The ROP serves as a foundational component of the NRC's oversight responsibilities, helping ensure the continued safe operation of our nation's nuclear reactor fleet. However, in the spirit of continuous improvement, it is important to periodically review programs such as the ROP to ensure we incorporate lessons learned and the adoption of new safety- and security-related systems or technologies, while also revising any antiquated or duplicative requirements that undermine the continued efficiency and effectiveness of the ROP. In turn, this will help ensure that a strong ROP remains in place for both our current operating reactor fleet and to apply appropriately for new reactor systems and designs that may come online in the future.

In particular, I am keenly focused on ensuring the safe and secure operation of our nation's existing nuclear power fleet during this pivotal time for the NRC, for the nation's energy and security needs, and for the future application of civilian nuclear technologies. We cannot afford operational foot faults among our nation's existing nuclear fleet in the coming years, particularly if they result from human error associated with complacency or taking our collective eyes off the ball. It is through this lens that I have reviewed the staff's recommendations to the ROP in this SECY.

I also recognize that these changes will lay the foundation for additional proposed changes to the ROP in order to further respond to Section 5(g) of Executive Order 14300, "Ordering the Reform of the Nuclear Regulatory Commission."

SECY-25-0045 recommends changes to the ROP in three different areas: 1) the assessment program, 2) the cross-cutting issues program, and 3) NRC-developed power reactor initial operator licensing examinations. For area (1), there are three distinct recommendations related to the ROP's assessment program. With regard to these area 1 recommendations, I approve suspending the Agency Action Review Meeting (AARM) unless a licensee meets the established criteria.¹ I also approve of revising the treatment of licensee-identified White inspection findings such that they are not considered Action Matrix inputs, yet will require inspection for closure.² However, I disapprove revising the Action Matrix criteria so that multiple White Action Matrix inputs in Column 2 (regulatory response from NRC) do not aggregate to result in assessment in Column 3 (degraded performance). The current aggregating condition is only if a plant received three White findings in one strategic performance area, suggesting a decline in performance needing additional oversight. Given that no plant has had the requisite White findings to be assessed in Column 3 since 2015, one could conclude that the program may be working as intended and that no further changes are needed with regard to aggregating White findings. For area (2), I join Chairman Wright in disapproving the staff's proposed changes to the cross-cutting issues program. A critical piece of the ROP, the cross-cutting issues program provides insightful early indications of declining performance so that actions can be taken before more

¹ Management Directive 8.14, <https://www.nrc.gov/docs/ML2307/ML23074A011.pdf>

² Details on the Action Matrix can be found at <https://www.nrc.gov/reactors/operating/oversight/actionmatrix-summary>

significant issues occur, while maintaining a performance-based structure. Finally, I approve of area (3) to modify guidance to shift away from each NRC region preparing at least one power reactor initial operator licensing examination per year, but only if the NRC continues to administer initial operator licensing examinations and issue initial operator licenses.

For any future changes to area 2 intended to simplify the cross-cutting issues program, staff should conduct an evaluation to determine what the appropriate cross-cutting thresholds should be, take NUREG-2165, "Safety Culture Common Language" into consideration, and submit a notation vote paper to the Commission with the findings.

Regarding the upcoming comprehensive review of the ROP, re-baselining the inspection program cannot be solely cutting inspections – the frequency, the number, or the scope. The staff should use data to provide a level of confidence that any reductions to inspections will be well-substantiated, targeted adjustments that will still result in processes that identify and resolve any declines in safety- or security-related performance as early as possible.