POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Carrie M. Safford, Secretary

FROM: Commissioner Weaver

SUBJECT: SECY-26-0014: Recommendations to Revise the Reactor Oversight Process Baseline Inspection Program

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

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

DOUGLAS WEAVER

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Date: 2026.02.27 18:13:38 -05'00'

Signature

Entered in STAR

Yes X

No ____

Commissioner Weaver's Comments on SECY-26-0014: Recommendations to Revise the Reactor Oversight Process Baseline Inspection Program

I approve the staff's recommendations for the Reactor Oversight Process (ROP) baseline inspection program and more-than-minor (MTM) issue screening criteria, subject to the comments below. The proposed changes represent a clear response to the ADVANCE Act and Executive Order 14300 Section 5(g) that will improve the NRC's efficiency while maintaining effective oversight.

The ROP was implemented in 2000 in response to concerns that the NRC's previous oversight process, the Systematic Assessment of Licensee Performance (SALP), was inconsistent, overly subjective, and not as focused on the most important safety issues. The ROP represented a significant improvement and provided a risk-informed, performance-based oversight process that was more objective and transparent than SALP.

While some aspects of the ROP (e.g., inspection procedures) have changed over time, the fundamental ROP framework has largely remained constant, including the number of ROP baseline inspection hours at each plant. When the ROP was first implemented, the ROP baseline inspection program required an estimated 2,165 inspection hours per reactor site each year; today, it requires approximately 2,000 hours.

While the number of ROP baseline inspection hours has remained relatively constant, overall licensee performance has improved since the initial implementation of the ROP, as demonstrated by decreasing trends in the number of Accident Sequence Precursor events, unplanned reactor scrams, and Greater-than-Green findings as well as a decreasing trend in the number of Greater-than-Green performance indicators. The improved licensee performance is supported by a reduced risk profile for the operating fleet, which is a result, in part, of the post-Fukushima FLEX modifications and implementation of risk-informed programs. I agree with the staff's conclusion that improved licensee performance warrants a reduction in oversight and that a reduction in the ROP baseline inspection program can be accomplished without compromising safety.

I commend the staff for performing a comprehensive review of the ROP and proposing changes to the ROP baseline inspection program to remove redundant inspection activities and make it more performance based. The proposed changes will improve the NRC's efficiency while maintaining effective oversight. I support the staff's recommendations for changes to the ROP baseline inspection program with the following modifications.

Since an effective PI&R program is a key element underlying licensee performance in each ROP cornerstone area and a fundamental goal of the NRC's inspection and assessment process is to establish confidence that each licensee is detecting and correcting problems in a manner that limits the risk to members of the public, the staff should retain the inspection in the ROP baseline inspection program, decrease its frequency to triennial, reduce the team size by two members, and reduce the scope to focus solely on evaluating the licensees' corrective action programs.

In reviewing the reactor safety inspection program, several options were considered for the engineering baseline inspections. These inspections are important because they proactively identify latent design and program vulnerabilities before they escalate into significant risks, but they are resource intensive for the NRC and licensees. The staff's recommendation for the engineering baseline inspections addresses this concern by reducing the resource burden for the NRC and licensees while maximizing inspector flexibility in sample selection based on plant-specific performance and recent engineering work. The staff should tailor these engineering

inspections for each site to focus on recent engineering activities at that site, such as design changes, plant modifications, and plant upgrades, so that the value added is maximized for the oversight program and the licensee. The staff should implement the revised engineering team inspection for a two-year period to focus its attention on recent engineering activities at the site; after that period, the engineering team inspection should transition to a triennial frequency.

I approve the staff's recommendation to suspend the previously scheduled effectiveness review for the engineering inspection program and instead conduct a revised review 24 months after implementation of the new engineering inspection program described in this paper. The staff should use the authority granted in SRM-SECY-25-0045, "Staff Requirements – SECY-25-0045 – Recommendations for Revising the Reactor Oversight Process," to adjust the ROP, as needed, to ensure that it remains an effective risk-informed, performance-based oversight process, including the extent and frequency of future ROP assessments. Accordingly, this could also include re-adjusting the inspection program if a significant decline in safety performance is observed in the future.

I approve the staff's recommendation to change the MTM issue screening criteria. The proposed changes will reduce subjectivity, improve consistency, and better align enforcement actions with their actual impact to public health and safety. While the proposed changes will likely reduce the number of Green findings in publicly available inspection reports, it is important to note that the proposed changes will neither eliminate Green findings entirely nor diminish the effectiveness of NRC oversight or its influence on site performance over time.

I agree with Chairman Nieh that the staff should develop a strategy to expand the technical and regulatory skillsets of regional inspection staff to enable their effective deployment across NRC licensing programs as the agency's resource focus shifts from oversight to licensing.

I also agree with Chairman Nieh that the staff should implement a structured refresher training program for all regional inspectors, developed by the new technical training organization in RES in consultation with the CNRI office director. This program should encompass training for resident inspectors on inspection procedures currently performed by specialized region-based inspectors they will pick up as part of these ROP changes.