

**POLICY ISSUE**  
**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Carrie M. Safford, Secretary  
**FROM:** Chairman Ho K. Nieh  
**SUBJECT:** SECY-26-0014: Recommendations to Revise the  
Reactor Oversight Process Baseline Inspection  
Program

Approved  Disapproved  Abstain  Not Participating

COMMENTS: Below  Attached  None

**Entered in STAR**

Yes

No



\_\_\_\_\_  
Signature  
Ho K. Nieh

\_\_\_\_\_  
Date: 02/06/2026

## **Chairman Nieh's comments on SECY-26-0014: Recommendations to Revise the Reactor Oversight Process Baseline Inspection Program**

I approve the staff's recommendations for the ROP baseline program and issue screening guidance. The staff has demonstrated regulatory excellence and continuous improvement through a systematic, data-driven evaluation. The recommendations are a significant step toward improved performance-based regulation, recognizing the current high level of safety performance across the US operating reactor fleet. It should also be noted that ongoing industry excellence and assessment activities—such as those performed by the Institute of Nuclear Power Operations and independent safety review boards—contribute to the high levels of safety and reliability observed across the operating fleet today, independent of NRC inspection activities. The ROP is a living program that can be adjusted accordingly based on staff self-assessment activities and trends in licensee safety performance.

Foremost, I understand these changes will have significant organizational and personal impact on NRC staff working in the regional offices. Together with the recently approved reorganization, these actions reflect a deliberate shift in NRC priorities during a pivotal period for the agency.

The talent and expertise of our regional inspection staff are critical assets to the NRC safety and security mission. As the agency anticipates a sustained increase in licensing activity in the coming years, it is essential that we deliberately leverage this talent to support the safe and timely deployment of nuclear technologies that advance our national priorities. Accordingly, should the Commission approve the reductions to the ROP baseline program proposed in this paper, 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.

The staff's foundational assumptions of maintaining at least two resident inspectors and the set of inspectable areas as defined in SECY-99-007 are sound and provide confidence to the American people that the NRC is maintaining an appropriate safety focus. In my view, NRC resident inspectors are the core of the agency's oversight program for the operating fleet. Their daily onsite presence and observations provide the NRC, licensees and the public with meaningful insights into licensee safety performance, organizational effectiveness and safety culture. As a former resident inspector, I recognize the critical role they play in serving the agency and the American people, particularly as these ROP changes place increased reliance on resident inspectors for the operating fleet.

My experience in the industry has shown that when the attention and resources of a high-performing organization are disproportionately spent on low-value activities, the result can be antithetical to safety. Under these ROP baseline inspection program changes, all inspectable areas continue to receive inspection at risk-adjusted frequencies and without duplication. The revised ROP baseline program better focuses NRC and licensee attention and resources on those activities that matter most to safety.

In the engineering inspection area, I found the staff's proposal for annual engineering inspections based on station performance to be insufficiently defined, and insufficiently defined expectations yield uneven results. Moreover, I did not find a compelling reason in the proposal

to perform an engineering team inspection annually. In my NRC and licensee experience, I found the engineering inspections to be among the most resource-intensive baseline inspections with marginal benefit to improving safety performance. Engineering team inspections involve weeks of preparation and deep reviews of sometimes decades-old licensing/design basis issues that often result in only minor or green findings. While the staff believes the new approach would depart from this practice, there was no evidence in the paper to describe how that would be achieved. Engineering performance is not a standalone cornerstone nor a cross-cutting area of the ROP. Engineering work products are a key activity supporting the safe and reliable operation of a nuclear station and can be effectively sampled through other baseline inspection procedures, as needed. Therefore, the revised 175-hour engineering team inspection should be conducted every three years rather than annually. A three-year engineering team inspection frequency will align well with other proposed frequency changes in this paper to enable balanced inspection workload planning.

For PI&R inspections, stand-alone PI&R team inspections should be approved by the CNRI office director to ensure regional consistency, disciplined use of resources and clear accountability.

Finally, as noted in the paper, the staff's one-time training for MTM screening in 2015 did not yield sustainable implementation. In my experience as an NRC inspector, my continuing training was limited to reactor technology refresher training at the TTC and sharing of experience at regional counterpart meetings. While valuable, these training opportunities did not consistently sharpen inspection skills, improve implementation or address the evolving regulatory landscape. 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.