

March 9, 1998

SECY-98-045

FOR: The Commissioners

FROM: L. Joseph Callan /s/
Executive Director for Operations

SUBJECT: STATUS OF THE INTEGRATED REVIEW OF THE NRC ASSESSMENT
PROCESS FOR OPERATING COMMERCIAL NUCLEAR REACTORS
(SRM 9700238)

PURPOSE:

This Commission paper responds to staff requirements memorandum (SRM) 9700238 in which the Commission requested that the staff provide periodic updates on the progress of the integrated review of the NRC assessment process for operating commercial nuclear reactors. This paper presents the preliminary results of the effort by the integrated review of assessment process (IRAP) team to create an improved and less resource-intensive integrated assessment process. The staff plans to integrate the schedules for the IRAP effort with the senior management meeting (SMM) improvements effort, and requests the Commission's approval to solicit public comment on the process described herein. Many of the approaches presented herein are still being developed and have not had widespread review by NRC management and staff, input from external stakeholders, or detailed validation and bench-marking. After it receives public and industry comments on the proposed process, the staff will provide a final assessment process, approved by NRC management, for the Commission's approval.

BACKGROUND:

In an SRM dated June 28, 1996, the Commission directed the staff to assess the SMM process and evaluate the development of indicators that can provide a basis for judging whether a plant should be placed on or deleted from the NRC Watch List. In response to the Commission's request, a study of the effectiveness of the SMM process was completed on

Contact:
Timothy J. Frye, NRR
301-415-1287

December 30, 1996, by the Arthur Anderson Company. On April 2, 1997, the staff issued SECY-97-072, "Staff Action Plan to Improve the Senior Management Meeting Process," to inform the Commission of the staff's plans to address the recommendations made by the Arthur Andersen Company. On June 24, 1997, the Commission issued SRM M970424B, "Staff Requirements—Briefing on Staff Response to Arthur Andersen Study Recommendations," in which it approved the staff's plan to develop improvements to the SMM process.

In parallel with the efforts of the Office for Analysis and Evaluation of Operational Data (AEOD) to evaluate improvements to the SMM process, several SRMs directed the staff to improve the objectivity, accuracy, and efficiency of the current assessment process and to evaluate the efficacy of defining and formalizing a unified licensee performance assessment program that integrates the various separate processes being utilized. On June 6, 1997, the staff issued SECY-97-122, "Integrated Review of the NRC Assessment Process for Operating Commercial Nuclear Reactors," to inform the Commission of the staff's plans to perform an integrated review of the current NRC assessment processes, including plant performance reviews (PPRs), systematic assessments of licensee performance (SALPs), and SMMs. On August 19, 1997, the Commission issued SRM 9700238, "Staff Requirements—SECY-97-122—Integrated Review of the NRC Assessment Process for Operating Commercial Nuclear Reactors," which approved the staff's plans to perform the integrated review.

On September 19, 1997, the staff briefed the Commission on the status of improvements to the SMM process and the objectives, goals, and schedule for the integrated review of assessment effort.

An IRAP team was assembled with representatives from each regional office, AEOD, the Office of Enforcement, the Office of the EDO, the Office of Nuclear Reactor Regulation (NRR) Inspection Program Branch, and the NRR Division of Reactor Projects. The team members included a cross section of experience represented by deputy division directors, branch chiefs, project managers, and staff with recent regional inspection experience. The first team meeting was held the week of September 29, 1997, and four meetings have been held to date.

The IRAP team took a process re-engineering approach to identify those objectives, attributes, and activities that a new assessment process would need to adequately assess licensee performance and to identify the sources of information necessary to support the assessment. The team evaluated the current assessment processes, such as the SALP, PPR, and the SMM, using continuous quality improvement techniques to determine which attributes may be retained to support the new process. The inspection and enforcement programs were assumed to be implemented "as-is" for the integrated review, while any necessary changes to these programs resulting from this effort will be evaluated separately following the integrated review.

During the second team meeting, a public meeting was held on November 6, 1997, and attended by representatives of the Nuclear Energy Institute (NEI) and the Union of Concerned Scientists (UCS). Concerns about the current assessment processes and comments regarding the development of any new assessment process were raised at this meeting. These comments were noted and were reviewed by the IRAP team after the meeting. Future workshops and meetings are planned to obtain additional industry and public input on the new assessment process to ensure that all stakeholder comments are properly considered and evaluated. The team anticipates further deliberation on such issues as the inclusion of positive findings within the PIM.

The results of the IRAP team effort to date and the possible approaches for a new integrated assessment process are discussed below.

DISCUSSION

A brief overview of the proposed new assessment process under consideration, its objectives, and those attributes that it was designed to meet are discussed below. Those issues that are key differences from current processes are discussed. Also included is a discussion of integrating schedules and resources with the AEOD SMM improvement project, and a discussion of and a request for Commission approval for additional public interaction regarding the proposals in this paper. Attachment 1 contains a more detailed discussion of the proposed new integrated assessment process. Attachment 2 provides a schedule of the activities and milestones for the integrated review. Attachment 3 provides a simplified version of a decision logic model which will be used by the proposed assessment process.

As one of its first activities, the IRAP team considered the weaknesses of the current assessment processes to help determine those attributes that should be addressed and corrected by a new integrated assessment process. Some of these weaknesses include the following:

- redundancy of many of the current assessment processes
- assessment criteria that differ between processes
- assessment processes that have the potential for inconsistent implementation
- assessment results such as SALP scores and watch list designations that are not clearly defined and not well understood by the public or the industry

The team also considered many of the strengths of the current assessment processes, such as graded assessment areas, which reflect licensee performance, and public meetings with licensees to discuss the results of the assessments. Criteria were developed to address the weaknesses and to preserve the strengths of the current assessment processes. The new process must achieve the following:

- Provide clear roles and responsibilities.
- Maintain data integrity so that the process does not distort the data
- Include a decision model or criteria so that NRC actions are predictable.
- Be risk informed.
- Be simple, nonredundant, and efficient.

Objectivity, consistency, predictability, and scrutability will be enhanced by designing a new assessment process that meets the above attributes.

It was determined that the overall objective of any new assessment process should be to accurately assess the overall safety performance of all U.S. commercial nuclear power plants to verify that they are operating safely and to identify and prompt the correction of underlying safety issues.

This objective is similar to that of other NRC processes such as the inspection and enforcement programs. The new assessment process is not intended to supplant these other processes, but is meant to make broader conclusions on licensee performance based on the integration of

performance issues from these processes. Likewise, NRC actions resulting from the new assessment process are intended to supplement NRC actions already taken by the separate processes, based on the integration and broad assessment of licensee performance issues.

Boundary conditions and additional objectives were also established for the new assessment process. They include: (1) all plants must be periodically evaluated, but not necessarily with an overall ranking of performance, (2) the process must maintain a clear focus on assessing licensee performance against regulatory requirements to ensure the adequate protection of public health and safety (in contrast, a widely held perception of the current process is that the NRC staff assesses licensee performance against a more subjective standard involving a rising standard of excellence), (3) a graded approach should be taken for NRC actions based on licensee performance, (4) actions taken by the NRC must be in accordance with existing policies, (5) any new process must be closely aligned with the enforcement policy, (6) licensees should have the opportunity to respond to assessments before the NRC takes action, and (7) the results and basis of the assessment can be effectively communicated to licensees and the public.

Fundamental Assumptions and Key Differences from the Current Assessment Processes

The underlying assumptions and the key differences from the current processes are discussed before focusing on the new process.

- The new assessment process will not attempt to make distinctions among those plants that meet regulatory requirements in order to determine which plants are performing better than others, nor will the new process attempt to identify excellent or superior licensee performance.
- The inspection program will continue to observe all aspects of licensee performance, including issues reflecting both positive and negative performance attributes. However, the new assessment process will not consider inspection findings consisting solely of good or neutral licensee performance. Those findings involving weak or poor licensee performance will still retain both the positive and negative aspects of the issue to ensure that the proper context of licensee performance is maintained.
- The absence of inspection and performance issues in an assessment area is indicative of licensee performance that meets regulatory requirements. This assumption is based on the continued sampling of all assessment areas by the inspection program to ensure that examples of licensee performance that do not meet regulatory requirements are identified.
- The significance of inspection issues will be assigned directly to the data and will be based on safety and regulatory significance. This graded inspection data will be made publicly available on a periodic basis so that both licensees and the public can determine how inspection issues affect the overall assessment of licensee performance.
- A decision logic model shall be used to provide for a structured and graded approach to NRC actions, based on the assessment of licensee performance. However, this process will not preclude the NRC from taking any action as warranted in a timely manner.

- A graded approach will be taken to the level of NRC management involvement required in the assessment and decision processes. An annual meeting will be held in each of the four regions to assess licensee performance at each plant. This meeting will be conducted by regional NRC management, with participation by the appropriate Headquarters' offices. The majority of licensees who generally meet or exceed regulatory requirements will require only regional NRC involvement for implementing actions. Only those plants whose performance warrants heightened, agency-wide action will be forwarded for further discussion by Headquarters' management. This annual assessment process will be performed in place of the current PPR, SALP, and SMM processes.
- Regulatory-based NRC actions (such as assigning additional inspection resources and issuing 10 CFR 50.54(f) letters, on one end of the spectrum, to issuing orders on the other) are sufficient to ensure that the objectives of the new assessment process can be met. Further, many of the positive attributes and strengths of the current processes (such as graded assessments and public interaction) are retained in the new assessment process. Therefore, SALP grades, SALP reports, and the SMM Watch List will not be needed in the new assessment process.

After considering these attributes, objectives, and assumptions, the IRAP team designed a new assessment process as described below.

Overview of the Proposed New Integrated Assessment Process

The inspection program will continue to observe both positive and negative performance attributes and document these observations within inspection reports in accordance with existing guidance. Performance issues (i.e., issues identified in inspection reports, licensee event reports, docketed correspondence) are entered into the Plant Issues Matrix (PIM). Good or neutral assessments of licensee performance are not included in the PIM. Issues of weak or poor licensee performance are entered in the PIM and include both the positive and negative aspects of each issue to ensure that the issue is placed in the proper context.

Each PIM entry is graded for significance and assigned to one or more template categories. The template is a tool for sorting inspection issues for assessment and includes categories such as:

- problem identification and resolution
- operating performance
- human performance
- material condition
- engineering/design
- programs and processes

An additional template category, "Management Effectiveness," is currently being developed by AEOD and may be included in the future as an assessment area.

The team chose a template format because it allows for the identification of the causes of issues (such as human performance) and the effect of the issues on plant operation (such as

material condition). The graded PIM in template format is periodically issued to the public to allow both the licensee and the general public to see how each individual issue affects overall licensee performance.

The graded PIM entries are periodically aggregated by template category to assess licensee performance by assigning a color assessment rating to each template category. The following color ratings will be used:

- GREEN—Performance that generally meets or exceeds regulatory requirements
- YELLOW—Performance that demonstrates a pattern of noncompliance with regulatory requirements or that results in a number of performance issues indicative of a programmatic weakness that warrants increased licensee attention or corrective actions
- RED—Performance that demonstrates significant noncompliance with regulatory requirements in a systemic or pervasive manner that warrants licensee corrective action

These color ratings for each template category will be assigned using numerically-based thresholds. Licensee performance will be assessed both routinely (after inspections are completed) and annually. Regional management will routinely assess performance to detect changing trends in performance and to periodically reallocate regional inspection resources.

An annual meeting will be held in each region to assess the performance of every plant. This meeting will allow for the review of, and reconciliation between, the template assessment and other information, such as licensee-provided assessments, AEOD trending methodology, and industry performance indicators. Although held in the regions, active participation by personnel from Headquarters' offices, including NRR, Office of Enforcement, Office of Investigations, and AEOD, will ensure consistency and the proper consideration of all assessment information. A decision logic model, as shown in Attachment 3, will be applied to the assessment results in each template category to determine the range of actions that should be considered, based on licensee performance. Following the regional meeting, those plants with significant performance weaknesses will be discussed by senior NRC managers at a Headquarters's meeting. Only those plants whose performance indicates the need for heightened agency level action (i.e., special inspections or an order to modify, suspend, or revoke licensed activities) will be forwarded to this meeting. After the Headquarters' meeting, the Commission will be notified of the results of the annual assessment meetings.

The assessment results and the proposed actions for each plant are issued by letter to the applicable licensees and made available to the public. The assessment results are then reviewed with each licensee at a public meeting. Licensees are afforded the opportunity to respond to the assessment before the NRC takes any proposed actions. NRC actions, such as issuing an assessment letter and holding a public meeting with the licensee to review its performance, are taken in a graded approach with different levels of NRC management responsible for the action, depending on licensee performance.

Integration With AEOD SMM Improvement Activities

As proposed by the staff in SECY-97-072 and as directed by the Commission in SRMs M970424B and M970919C, improvements to the current SMM process have been under development by AEOD in parallel with the IRAP effort. For the new assessment process, the IRAP team considered several assessment tools being developed by AEOD, such as the plant

performance assessment template and trending methodology. Although the work on these two efforts has been closely coordinated, their schedules have developed separately. The staff now proposes that the schedules for these two efforts be integrated.

In accordance with SRM 9700238, a new assessment process was to be developed by June 18, 1998. The team proposes that the schedule for the IRAP effort be modified as follows to allow better integration with the development of the SMM template by AEOD. The proposed new assessment process, including the template and any other associated tools developed by AEOD, would be issued together for public comment in May 1998. After a 60-day public comment period, the Advisory Committee on Reactor Safeguards (ACRS) would be briefed in September 1998 on the new assessment process and on the public comments received. A Commission briefing would then be held by October 30, 1998, to seek approval for the new assessment process and for the plans developed for its implementation. The team will likely propose a phased implementation of the new assessment process starting in January 1999, with the current processes being phased out throughout the year. The first annual assessment meeting of the new process would be held around January 2000. The implementation date of January 1999 is approximately 1 month later than the original schedule. This proposed integrated schedule is also provided as Attachment 2. The team believes that these schedule adjustments are necessary to allow a coordinated product to be issued for public comment, and to allow sufficient time to receive, evaluate, and incorporate public comments on a new assessment process. The team notes that the proposed schedule is both challenging and relies on the successful and timely completion of several significant milestones including the consideration of internal and external stakeholder comment.

Efforts to coordinate resources between the SMM improvement effort by AEOD and the IRAP effort will continue. For example, the Office of Nuclear Regulatory Research and AEOD have coordinated workshops to develop guidance for performing an overall risk-based assessment of the template to support the current SMM process. The IRAP team has sought assistance from this group, as necessary, to help in the development of risk-informed PIM scoring and template category assessment thresholds for the new assessment process.

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objections to its content.

The Office of the Chief Information Officer has reviewed this Commission paper for information technology and information management implications and has no objections to its content.

The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections to its content.

RECOMMENDATION: That the Commission:

1. Approve the staff begin soliciting, by May 1998, public comments on the proposed new assessment process as described herein.
2. Note:

- a. The staff will integrate the IRAP schedule with the AEOD SMM improvement schedule; NRR is the lead office for the integrated review of assessment process;
- b. The new assessment process and SMM improvements would be published in the Federal Register for a 60-day public comment period;
- c. The proposed schedule (Attachment 2), reflects changes from the original schedule and is contingent upon solicitation of public comments by May 1, 1998.

L. Joseph Callan
Executive Director
for Operations

NOTE: TO BE MADE PUBLICLY AVAILABLE WHEN THE FINAL SRM IS AVAILABLE

- Attachments:
1. Detailed Discussion of the Proposed
New Integrated Assessment Process
 2. Schedule of Integrated Review of
Assessment Activities and Milestones
 3. Simplified Decision Logic Model

The Office of the Chief Information Officer has reviewed this Commission paper for information technology and information management implications and has no objections to its content.

The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections to its content.

RECOMMENDATION: That the Commission:

1. Approve the staff begin soliciting, by May 1998, public comments on the proposed new assessment process as described herein.
2. Note:
 - a. The staff will integrate the IRAP schedule with the AEOD SMM improvement schedule;
 - b. The new assessment process and SMM improvements would be published in the Federal Register for a 60-day public comment period;
 - c. The proposed schedule (Attachment 2), which reflects changes from the original schedule of approximately 6 weeks for obtaining final Commission approval (July 31, 1998) and one month for implementing the new process (January 1999), is contingent upon solicitation of public comments by April 1, 1998;

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Executive Director
for Operations

NOTE: TO BE MADE PUBLICLY AVAILABLE WHEN THE FINAL SRM IS AVAILABLE

- Attachments:
1. Detailed Discussion of the Proposed New Integrated Assessment Process
 2. Schedule of Integrated Review of Assessment Activities and Milestones
 3. Simplified Decision Logic Model

DOCUMENT NAME: IRAPSECY2.WPD

* See previous concurrence

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**DETAILED DISCUSSION
OF THE
PROPOSED NEW INTEGRATED ASSESSMENT PROCESS**

DISCUSSION OF THE OBJECTIVES AND ATTRIBUTES OF A NEW INTEGRATED ASSESSMENT PROCESS

The integrated review of assessment process (IRAP) team determined that the overall objective of any new assessment process should be to accurately assess the overall safety performance of all U.S. commercial nuclear power plants to verify that they are operating safely and to identify and prompt the correction of underlying safety issues.

This objective is similar to that of other NRC processes such as the inspection and enforcement programs. The new assessment process is not intended to supplant these other processes, but is meant to make broader conclusions on licensee performance based on the integration of performance issues from these processes. Likewise, this new assessment process is not intended to preclude taking NRC action as warranted by the other processes. Rather, NRC actions resulting from the assessment process are intended to supplement actions already taken based on the integration and broad assessment of licensee performance issues.

The purpose of assessing licensee performance is not to identify or measure excellence, but to evaluate licensee performance against regulatory requirements to ensure the adequate protection of the public health and safety. Therefore, the team concluded that any new assessment process should not attempt to make distinctions among those plants that are clearly meeting regulatory requirements in order to determine which of those plants are performing better than the others.

Nuclear power plant licensees are responsible for operating the plant in accordance with their license. Assurance of continued safe operation rests on the licensee programs and processes that are required by NRC rules and regulations, and that are verified by NRC regulatory oversight. Assuming that the inspection program is implemented as required to provide a broad sample of licensed activities, the new assessment process proposed by the team will rely on the fact that a lack of negative findings is indicative of licensee performance that meets or exceeds regulatory requirements. Therefore, the new assessment process will not evaluate those issues solely pertaining to good or neutral licensee performance. However, those issues involving weak or poor licensee performance will still retain both the positive and negative aspects of the issue to ensure that the proper context of licensee performance is maintained.

The new assessment process proposed by the team will retain many of the strengths and positive attributes of the current assessment processes. These attributes include: (1) periodic assessments that are frequent enough to assess current performance, but with a long enough data window to identify trends in performance, (2) graded assessment areas to accurately reflect licensee performance, and that clearly communicate this assessment to all stakeholders, (3) public meetings with licensees to discuss the results of the assessment, and (4) senior NRC management review of those licensees with significant performance weaknesses to develop coordinated agency positions and actions. By incorporating these attributes into a single assessment process, separate systematic assessment of licensee performance (SALP) meetings, plant performance review (PPR) meetings, and the senior management meeting (SMM) Watch List are superseded.

Licensees and the public should be able to predict NRC actions based on the inspection issues documented in the PIM. To accomplish this goal, a decision logic model has been developed which provides for a structured and graded approach for NRC actions that can be taken based on the assessment of licensee performance in each template category. This graded approach

will be taken for actions such as the assignment of additional inspection resources, the type of public meeting to hold with the licensee, and the level of NRC management review required to validate the assessment and to approve any recommended actions. The Decision Logic Model further directs the consideration of a series of actions of increasing significance, such as confirmatory action letters (CALs); special inspections; 10 CFR 50.54(f) letters; and orders to modify, suspend, or revoke licensed activities. By periodically issuing an updated and graded Plant Issues Matrix (PIM) and with a published decision logic model, licensees and the public will be able to foresee and anticipate future NRC actions on the basis of changing trends in licensee performance.

The use of the new assessment process will not preclude taking actions in a timely manner. For example, the issuance of a CAL or assignment of an inspection in response to a plant event may still be performed independent of the annual assessment process. The new process will also be closely aligned with the enforcement policy so that the enforcement actions taken are assessed equally and consistently among plants. The opportunity for licensees to provide a response to assessments and proposed actions is factored in at several different levels of the process. Finally, required changes to the inspection program and enforcement policy based on changes to the assessment process will be reviewed after the IRAP team effort is completed.

DISCUSSION OF THE SPECIFICS OF THE PROPOSED NEW INTEGRATED ASSESSMENT PROCESS

Performance issues (i.e., those from inspection reports, licensee event reports, and other docketed correspondence) are entered into the PIM. These issues are then assigned one or more template categories. The template is a tool for sorting these inspection issues to support the assessment of licensee performance and is broken down into categories such as the following:

- problem identification and resolution
- operating performance
- human performance
- material condition
- engineering/design
- programs and processes

An additional template category, "Management Effectiveness," is currently being developed by the Office for Analysis and Evaluation of Operational Data (AEOD) and may be included in the future as an additional assessment area.

A template format was chosen since it allows for the identification of the causes of issues (such as human performance) and the effect of issues on plant operation (such as material condition). The assessment of causal areas provides a leading indication of changes in licensee performance, and the functional area assessments allow for the targeting of inspection resources to further assess licensee performance.

Each PIM entry is assigned one or more template categories as appropriate. A significance-based scoring system is used by the inspector and regional managers to give a numerical score to each PIM entry. For example, a single point may be assigned to inspection issues such as NRC-identified performance issues that, if left uncorrected, could result in noncompliance with

NRC regulations. More points would be assigned to performance issues that actually result in negative impacts on plant operation, programmatic weaknesses, or noncompliance with an NRC regulation. The PIM is scored and updated every time new PIM entries are made. Although subjectivity is still present to a certain degree in assigning these numerical scores, the subjectivity is driven to the lowest possible level, to the source of the data, where it is best supported. Consistency in PIM scoring will be achieved through clear and thorough guidance documents, training of associated personnel, and oversight of process implementation by appropriate Headquarters' offices. An updated and scored PIM is periodically forwarded to the licensee and placed in the public document room. Licensees are afforded several opportunities to provide feedback on the significance of the PIM entries, for example, at the inspection exit meetings and after a revised PIM is issued with the inspection report.

A regional manager will periodically roll-up the scored PIM entries into an assessment to ensure that changes in licensee performance are promptly identified. Periodically (i.e., after every resident and special inspection report), the manager will aggregate the scored PIM data into template categories. The manager will then use numerical thresholds to score each category as "Green," "Yellow," or "Red." A Green rating indicates performance that generally meets or exceeds requirements, a Yellow rating indicates performance that demonstrates a pattern of noncompliance with regulatory requirements or results in a number of performance issues indicative of a programmatic weakness that warrants increased licensee attention or corrective actions; and a Red rating indicates performance that demonstrates significant noncompliance with regulatory requirements in a systemic or pervasive manner that warrants licensee corrective action. A rolling data window (i.e., 12 months) is used as the assessment data-base to allow for the identification of long-term trends in performance. The Decision Logic Model is used by regional management during these periodic assessments as guidance for proposing and taking actions as dictated by any changes in the assessment. Periodic changes to regional inspection resource allocations may be made on the basis of the results of these routine roll-ups of the PIM data. By using scored PIM entries, defined assessment thresholds, and an established decision logic model, assessments of licensee performance and the resulting NRC actions can be made in a traceable and repeatable manner, with a clear tie established between the assessment and the resultant action taken.

An annual performance assessment meeting will be held in each region to validate the performance assessment for each plant, and to review and approve recommended NRC actions. These regional assessment panels will be chaired by the regional division directors, attended by the Regional Administrator (RA), and participated in by representatives from AEOD, the Office of Enforcement, the Office of Investigations, the Office of Nuclear Reactor Regulation (NRR) Division of Reactor Projects, and the Agency Allegation Coordinator. Although these annual assessment meetings will be held at the regional level, active participation by Headquarters' personnel will ensure consistency and proper consideration of other assessment information. A regional manager will assess licensee performance in each template category by comparing the category color rating with other performance information, such as NRC and industry performance indicators, AEOD trend plot results, and information submitted before the annual assessment by the licensee. These comparisons with other performance measures will serve as a quality control check to validate the template assessment and to highlight discrepancies for further review and reconciliation at the assessment meeting. Based on the assessment results, the regional manager will also develop recommended NRC actions based on the Decision Logic Model. The manager will present the assessment results to the panel for validation and recommended actions for review and approval. NRC actions with regional

responsibility (i.e., regional initiative and team inspections) would be coordinated at an inspection planning meeting following the annual meeting.

Approximately 1 to 2 weeks following the last annual regional assessment meeting, senior NRC managers will meet to review the assessments for those plants with significant performance weaknesses. Those plants discussed by the senior managers will be a small subset of those plants that were discussed at the annual regional assessment meeting, and are those plants for which the Decision Logic Model directs the consideration of NRC actions requiring Headquarters' involvement (i.e., special inspections, 10 CFR 50.54(f) letters, orders). The RA will present the previously prepared assessment results for review by the senior managers and would also present recommended actions for approval. Review by senior NRC manager's of those plants with significant performance weaknesses will ensure that appropriate actions are taken commensurate with the assessment of licensee performance. After the Headquarters meeting, the Commission will be notified of the results of the annual assessment meetings.

Following the meeting of senior NRC managers and notification of the Commission, the assessment results and the proposed actions for each plant will be forwarded by letter to the associated licensees and made available to the public. A public meeting will be held with each licensee to discuss the assessment results and the proposed NRC actions. Licensees will be afforded the opportunity to respond to the assessment before the proposed actions are taken. This measure will ensure that any subsequent information provided by the licensee is reviewed and evaluated before action is taken. After the review of any licensee response, actions will be implemented as appropriate (i.e., scheduling and performance of inspections, issuance of CALs and 10 CFR 50.54(f) letters).

All of these actions will be taken in a graded approach in accordance with the Decision Logic Model and will depend on the overall template category assessment results. For example, the letters forwarding the assessment and the proposed actions to the licensees will be signed by either the Division Director or the RA, depending on the assessment. The public meeting with the licensee to discuss the assessment results will be held by the responsible branch chief (BC), RA, or the Executive Director of Operations (EDO) and/or the Commission as appropriate, also depending on the assessment results. Licensees with performance that generally meets or exceeds regulatory requirements will review their assessment with the BC, while licensees with significant performance weaknesses might meet with the EDO or the Commission, if appropriate.

**SCHEDULE OF
INTEGRATED REVIEW OF ASSESSMENT
ACTIVITIES AND MILESTONES**

Schedule of Integrated Review of Assessment Process (IRAP) Activities and Milestones

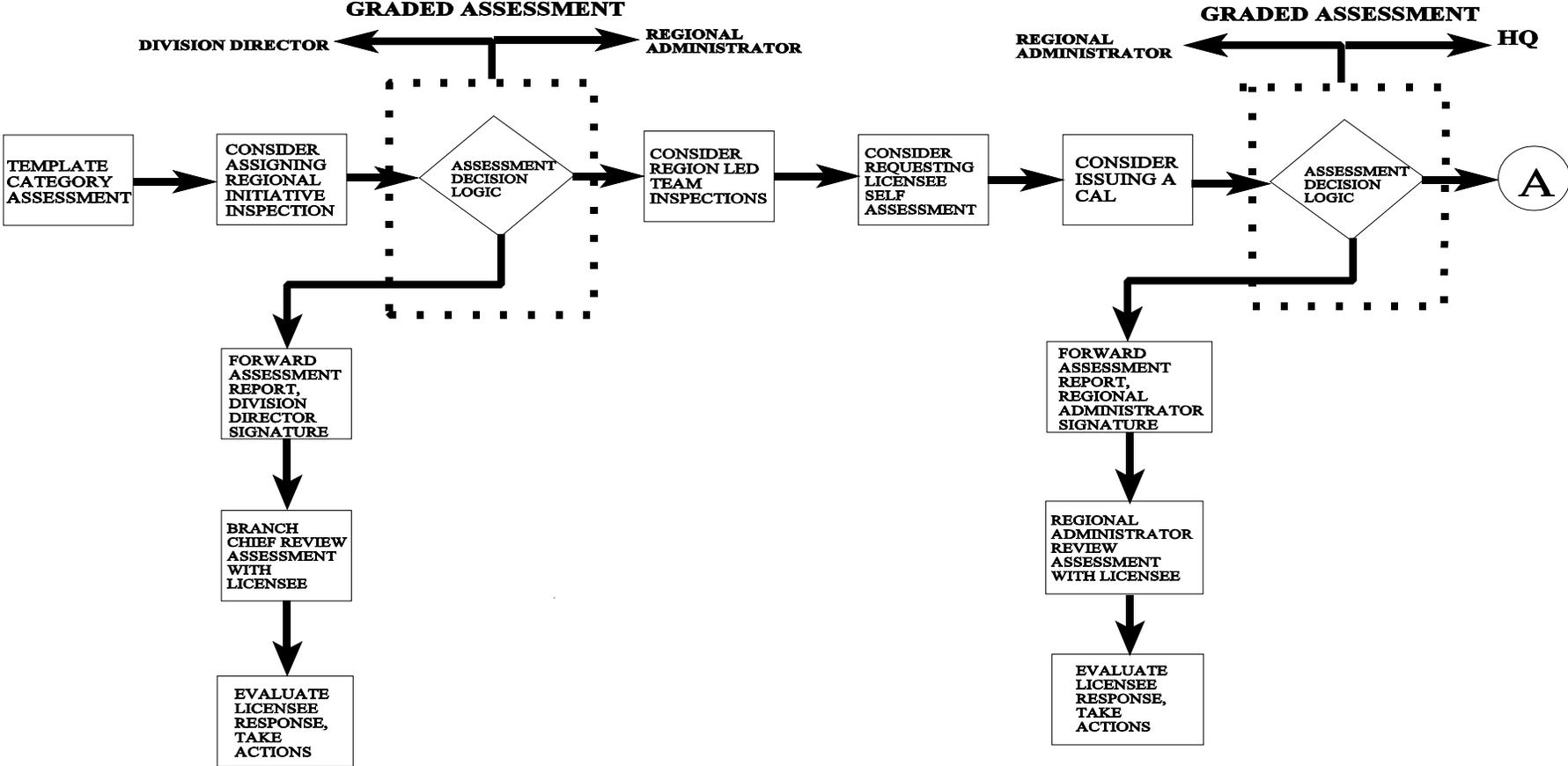
February 3 and 5, 1998	Briefed Advisory Committee on Reactor Safeguards (ACRS) on proposed assessment process.
February 3, 1998	Briefed senior NRC managers on proposed assessment process at the Office of Nuclear Reactor Regulation (NRR)/Regional Administrator (RA) meeting.
February 23-27, 1998	Final IRAP team meeting to finalize concepts for the new assessment process, develop strategies for validation, and discuss methods for obtaining public comment.
March 1998	Brief Commissioner Technical Assistants on new integrated assessment process.
April 1998	NRR commence solicitation of comments and concurrence from other NRC program offices and regions on the new assessment process.
April 15, 1998	Regulatory Information Conference breakout session held by NRR on the new assessment process.
April 30, 1998	Commission approval to solicit public comments
May 1, 1998	NRR issue <i>Federal Register</i> Notice to obtain public comment, commence 60-day public comment period.
May/June 1998	Public workshop(s) held by NRR on the new assessment process as needed.
July 1, 1998	End of the public comment period.
July 1998	Validation of the new integrated assessment process by NRR.
September 1998	Brief ACRS on the new assessment process, results of validation activities, and the results and resolution of the public comments.
October 15, 1998	Issue Commission paper describing the final proposed assessment process, results of validation, and plans for implementation.
October 30, 1998	Commission briefing on the final proposed integrated assessment process providing results of validation, results and resolution of public comments, and plans for implementing the new process. Request Commission approval to implement the new process.

Schedule of Integrated Review of Assessment Process (IRAP) Activities and Milestones
(continued)

January 1999	Begin implementation of the new integrated assessment process.
January-December 1999	Phasing out of current assessment processes and phasing in of new assessment process.
January 2000	First annual plant performance assessment conducted under the new assessment process.

SIMPLIFIED DECISION LOGIC MODEL

SIMPLIFIED DECISION LOGIC MODEL



HEADQUARTERS

