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# Comments on the NRC's Revised Reactor Oversight Process

**David Lochbaum**

**Nuclear Safety Engineer**

**Dlochbaum@ucsusa.org**

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## **Bottom Line**

**We recommend that the Commission  
implement the revised reactor oversight  
process industry-wide in April 2000 or as  
soon thereafter as possible**

**Various stakeholders, including UCS, have  
legitimate concerns that NRC should resolve  
expeditiously.**

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## **Why We Like the New Process**

- 1) Performance is assessed in ~ 27 areas instead of 4 broad categories**
- 2) Performance is assessed 30 days after 92-day period instead of 180 days after 730-day period**
- 3) NRC response to declining performance is predefined instead of ad hoc and arbitrary**
- 4) Performance information on all plants is available on internet instead of some information for some plants**

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## **Why We Worry About the New Process**

**Perception of Self-Regulation**  
**Significance Determination Process**  
**The Missing Link**  
**Deviations from the Action Matrix**  
**Cross-cutting Areas**

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## **Perception of Self-Regulation**

**Problem: New Oversight process depends heavily on plant owner cooperation**

*Recommendation: Obtain irrevocable committment from all plant owners*

**Problem: NRC's primary stakeholder is the nuclear industry**

*Recommendation: Stop treating the public as second-class stakeholders*

**Problem: NRC's public communications are poor**

*Recommendation: Issue reports in plain English*

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## **SDP (i.e., pick a color)**

**Problem: Pilot program demonstrated SDP to be unworkable**

*Recommendation: NRC should use plant-specific worksheets and SPAR models for SDP Phase 2 and 3 instead of plant owner's PRAs*

**Problem: SDP process for physical protection safety cornerstone is improper**

*Recommendation: SDP process should reflect plant owner - not terrorist - performance*

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## The Missing Link

**Problem: IPEs/PRAs totally ignore threat from terrorist and sabotage acts**

*Recommendation: Physical protection cornerstone cannot be risk-informed because the risk information does not exist; thus, this cornerstone must remain prescriptive*

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## **Deviations from the Matrix**

**Problem: Deviations from the responses in the  
Action Matrix are potential threats to safety  
and are tangible threats to public confidence**

*Recommendation: The NRC must take safety  
warnings seriously and not deviate from the  
Action Matrix*



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## **Cross-Cutting Areas**

**Problem: Handling NRC findings in cross -  
cutting areas via the SDP process will  
improperly downplay safety problems**

*Recommendation: NRC findings in cross-cutting  
areas must prompt extent of condition  
evaluation either by NRC or by plant owner*

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## **Back to the Bottom Line**

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