

**RIC 2005**  
**Session F4**  
**ROP / Cross-Cutting Issues**

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# Importance of Cross-Cutting Issues

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- Identify and highlight negative performance trends before the performance deficiencies manifest themselves as significant findings or events

# ROP and Substantive Cross-Cutting Issues

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- Licensee performance in cross-cutting areas, such as human performance and problem identification and resolution, is important to meeting the NRC safety goal.
- Issues in these cross-cutting areas generally manifest themselves as the root causes of performance problems as identified in findings and violations.
- Adequate licensee performance in these cross-cutting areas is evaluated through cornerstone performance results from inspection findings.

# Defining Threshold for Cross-Cutting Issues

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- Three (3) criteria needed to identify a Substantial Cross-Cutting Issue:
  1. Multiple findings - more than 3
  2. Same causal factor
  3. Concern with the licensee's scope of efforts or progress in addressing the cross-cutting area performance deficiency

# Following up Cross-Cutting Issues

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Three (3) options for following up a cross-cutting issue

1. Perform a trend analysis during the mid- and end-of-cycle assessment reviews
2. Inspect as a semi-annual PI&R inspection sample in accordance with IP 71152
3. Inspect as part of the biennial PI&R inspection in accordance with IP 71152

# Resolving Cross-Cutting Issues

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Criteria for closure is defined in assessment letter

- Fewer/less significant findings
- Increased confidence in the licensee's scope of efforts or progress in addressing the cross-cutting area performance deficiency

# Conclusion

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- Substantive Cross-Cutting Issues are important to the implementation of the ROP
- Post-EOC critique will be performed to assess the changes to the Assessment Process
- Continue efforts to improve consistency in the implementation of cross-cutting issue guidance