

Getting Ahead of Performance Issues

Whose Job Is It?

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ROP Principles

- The ROP recognizes “performance” as a relative measure
- Among the key ROP principles:
 - Thresholds will be set for licensee safety performance, above which increased NRC interaction (including enforcement) would not be warranted
- This recognized:
 - Licensee action to address degrading performance should be considered first
- And led to the “Licensee Response Column”
 - All assessment inputs are green



Changing Perceptions of ROP

- When all or most indicators and inspection findings are **GREEN**
 - Industry perception:
 - Performance must be good
 - Results provide an indicator of future performance
 - NRC perception:
 - ROP must be ineffective in identifying declining performance
 - Any “non-Green” indicator or finding demonstrates ineffectiveness of licensee programs to address declining performance



Performance is a Relative Measure

- **Neither perception is in full alignment with ROP principles**
 - “Good Performance” and “Declining Performance” are both relative measures
- **“Good Performance” is not a stopping point**
 - Licensees have the first line of responsibility for continuing and improving on good performance
 - Early detection of performance declines is essential to performance improvement
- **“Declining Performance” is not a threshold for NRC action**
 - ROP utilizes risk-informed thresholds that are established to enable a licensee the first opportunity to address any early indications of declining performance
 - A clear and strong link to significant inspection findings or degraded PIs should be shown before NRC action is taken on programmatic concerns



ROP Changes

- **The ROP is not a static process**
- **Changes should be considered whenever problem areas are identified**
- **Proposed changes must, however**
 - Clearly identify the problem being addressed
 - Incorporate stakeholder input
 - Conform with founding principles of ROP


