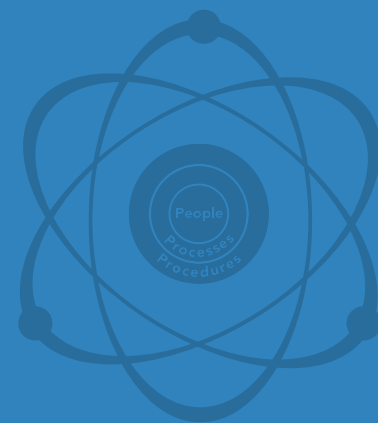


Regulatory Oversight Process Entropy

A process of degradation or running down or a trend to disorder

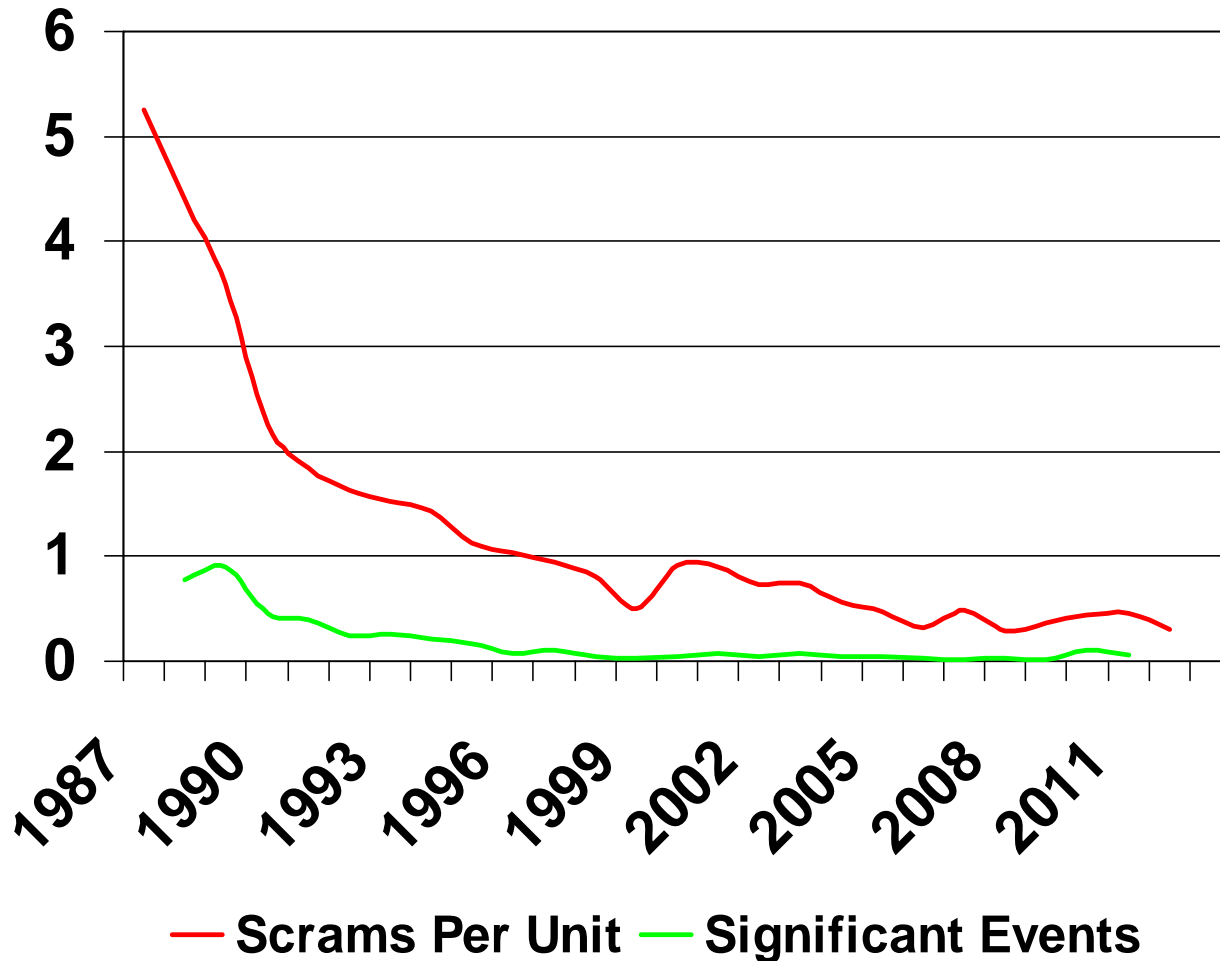
Greg Halnon

Director Regulatory Affairs



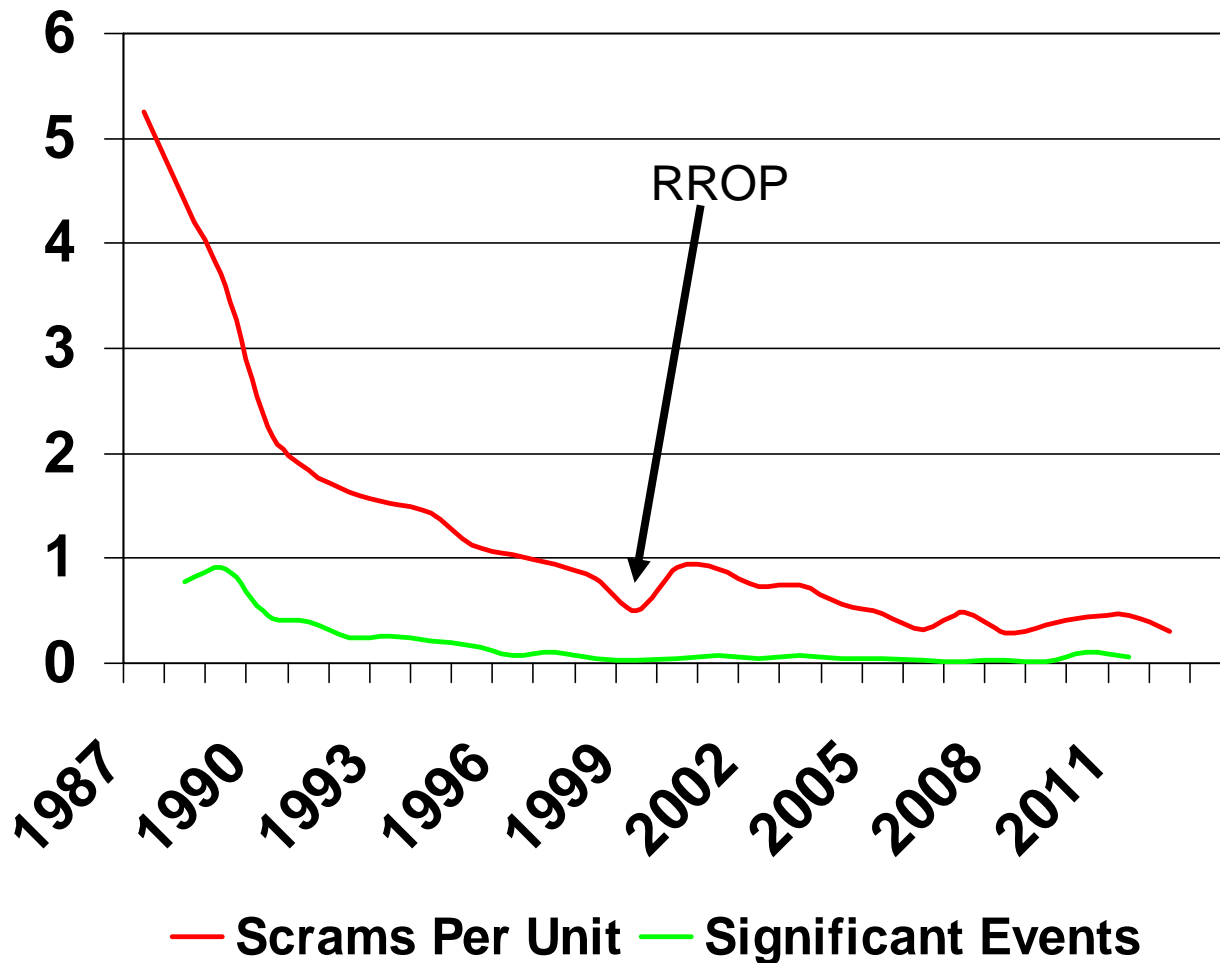
Nuclear Industry Safety Performance

Scram Rate and Significant Events



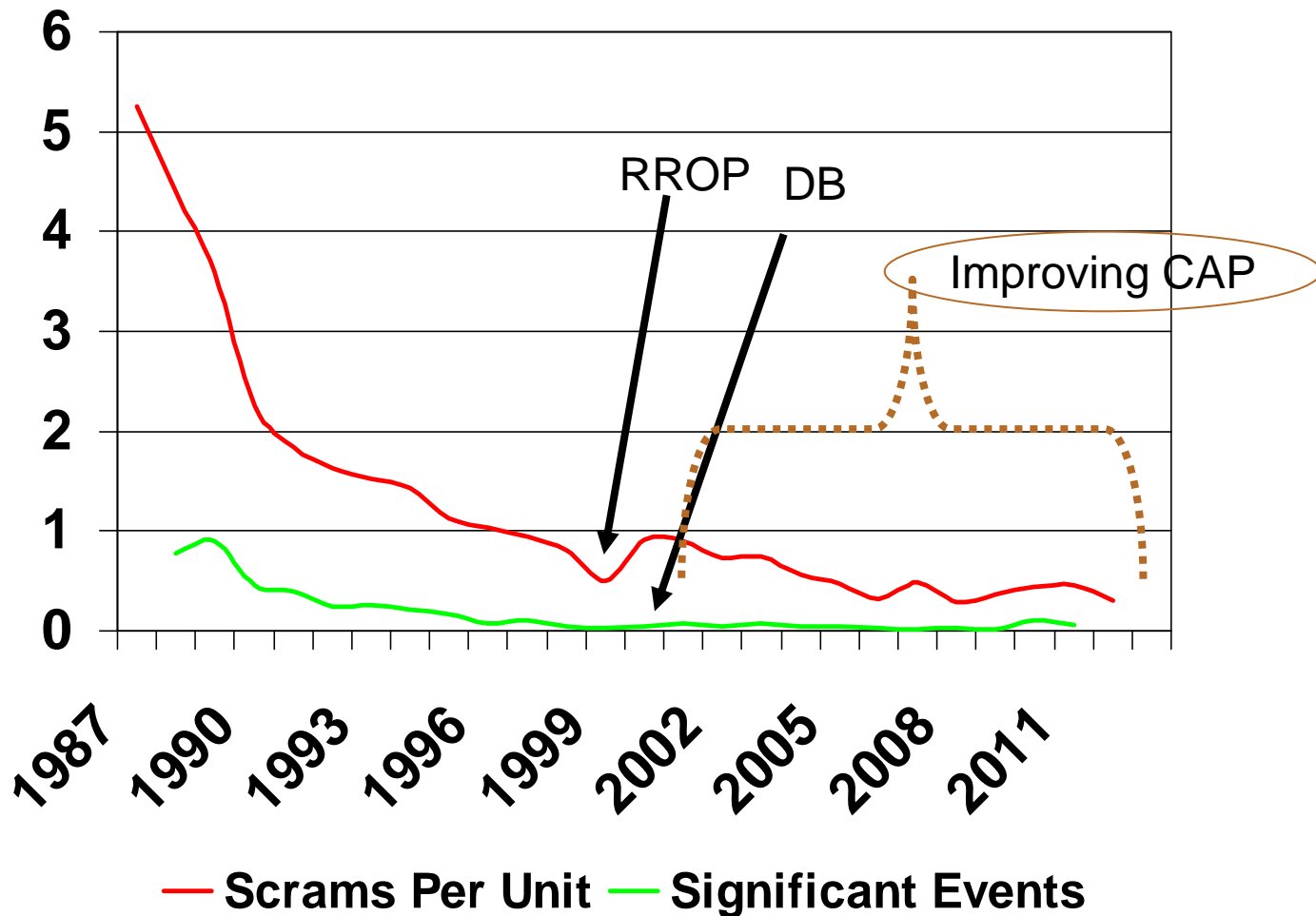
Nuclear Industry Safety Performance

Scram Rate and Significant Events



Nuclear Industry Safety Performance

Scram Rate and Significant Events



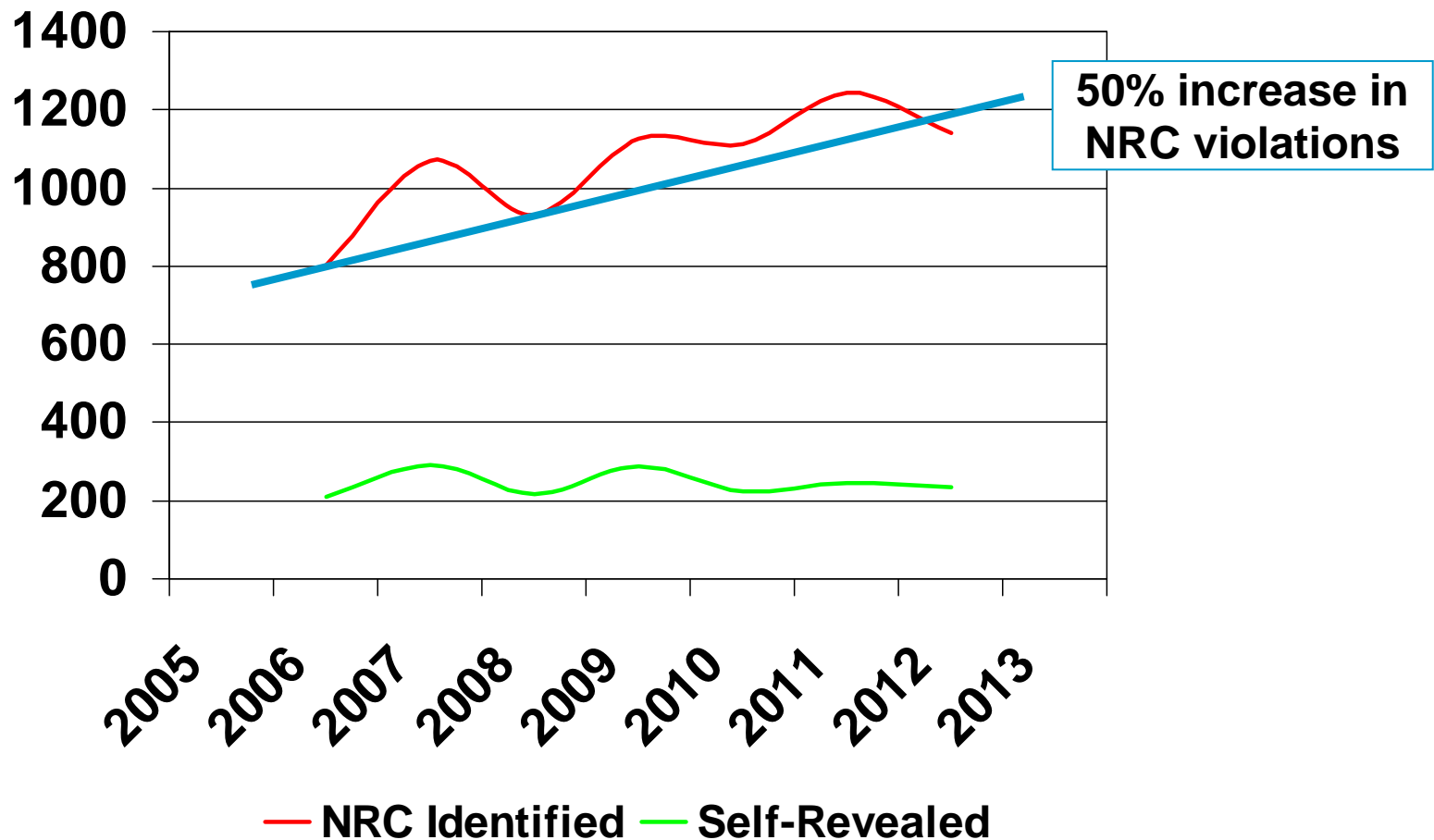
Accolades

- **Corrective Action Programs have improved**
- **Safety Culture is assessed**
- **Transparency has increased**
- **Process is well documented and, for the most part, predictable**

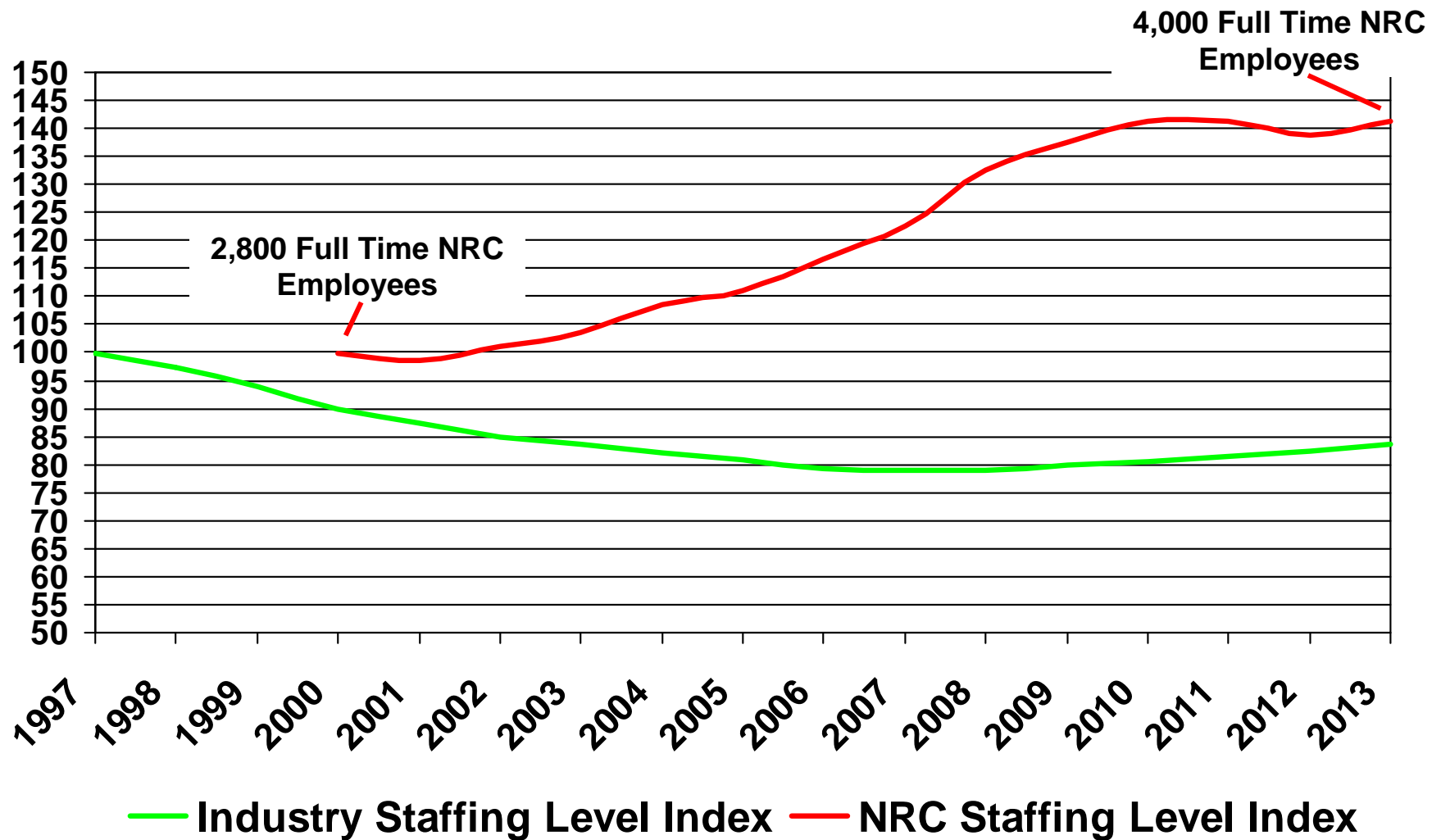
- **But.....**

Nuclear Industry Safety Performance, *continued*

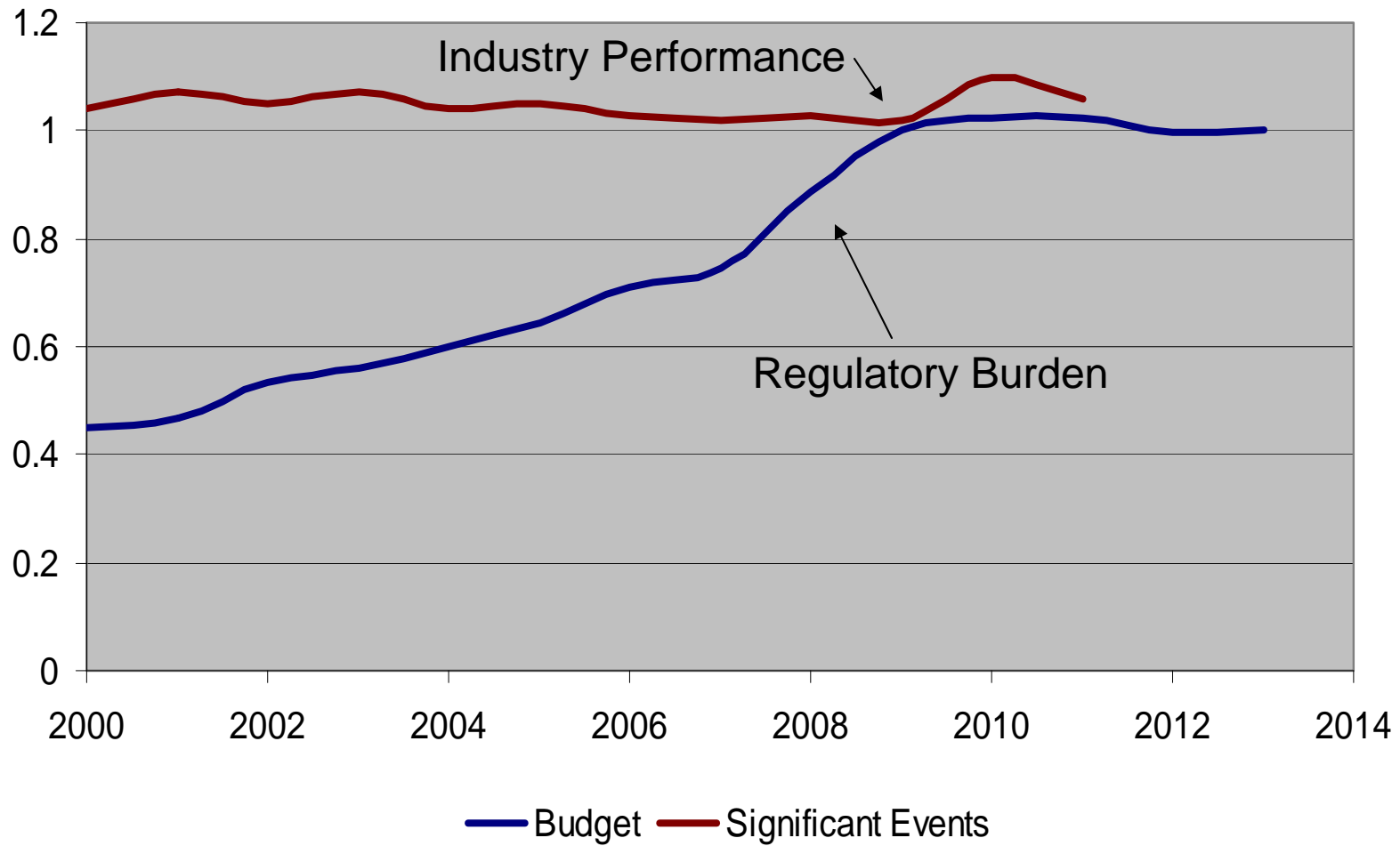
NRC Identified Findings vs. Self-Revealed Findings



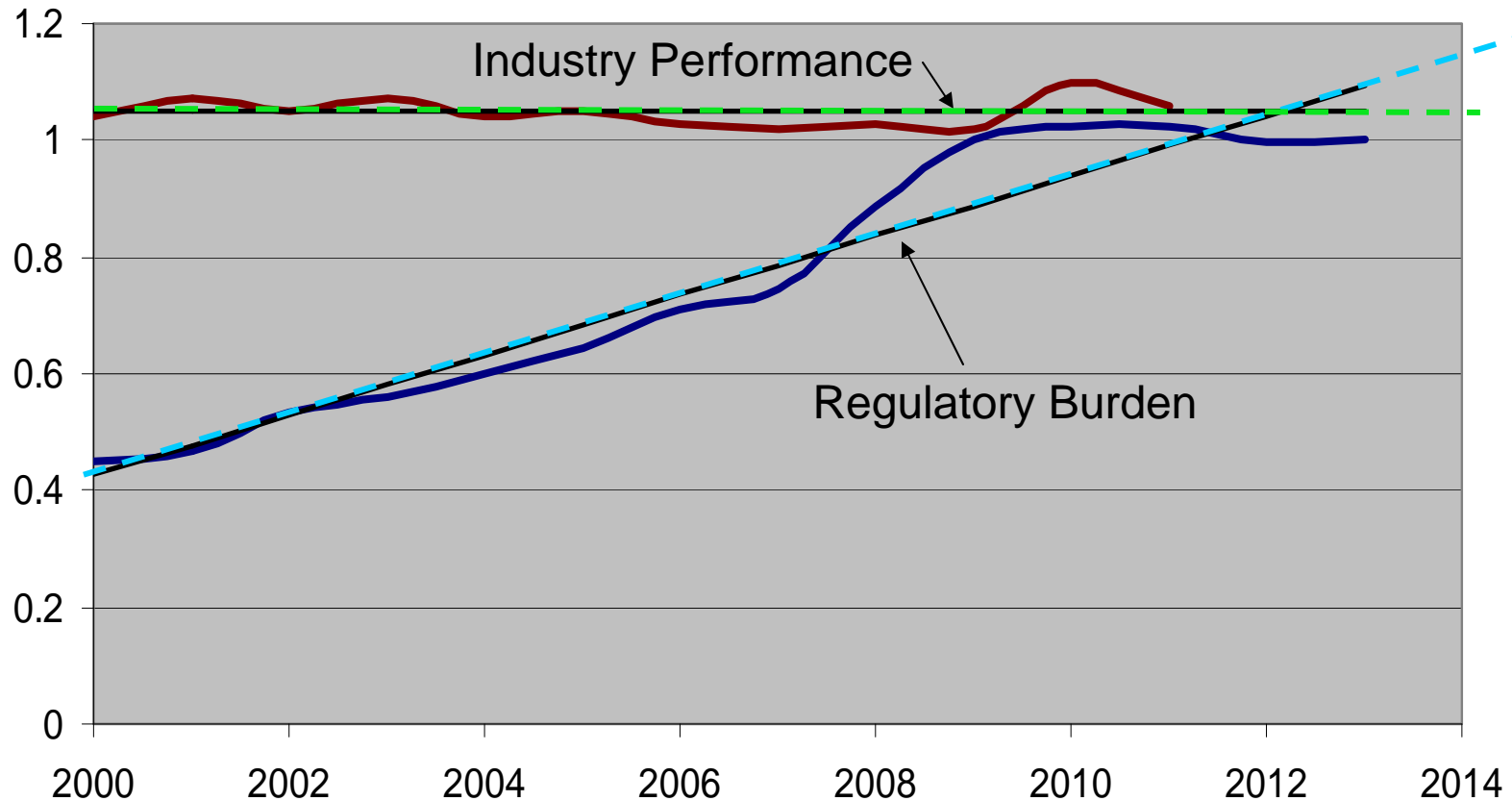
Industry vs. NRC Staffing Levels



Trends to Disorder

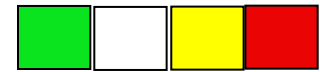


Trends to Disorder



— Budget — Significant Events — Linear (Budget) — Linear (Significant Events)

What is the ROP Supposed To Do?



■ Improve objectivity of the inspection process

- Cross Cutting Areas assignment and trending
- SDP for EP and Security



■ Improve Scrutability- clear tie to licensee performance

- Findings set precedence
 - OPDRV Issue
 - Perry P-T Curve set at 0 psig
- Non-findings set precedence
 - Holtec Seismic Stack up Issue
- SCCI's



■ Risk-Informed: Focus resources on greatest impact to safety

- Minor violation for missing Part 55 report over weekend



Other Issues - Oops

- **Substantive Cross Cutting Issues- ambiguity, subjectivity, and time consuming**
- **Bagman trips- another week of unpredictable inspection**
- **Variability in NRC Team leadership and conduct**
- **Length of time to determine:**
 - Significance
 - Unresolved Items
- **Transparency of TIAs (lack of)**
- **Threshold from Column 2 to 3 versus applied resources**
- **Regulation by Inspection**

Thank You



Questions & Answers