

# Improving the Operability Determination Process

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Senior Reactor Operators are the  
nuclear station's greatest resource.

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# Principles of Good Regulation



## Efficiency

The American taxpayer, the rate-paying consumer, and licensees are all entitled to the best possible management and administration of regulatory activities. The highest technical and managerial competence is required, and must be a constant agency goal. NRC must establish means to evaluate and continually upgrade its regulatory capabilities. Regulatory activities should be consistent with the degree of risk reduction they achieve. **Where several effective alternatives are available, the option which minimizes the use of resources should be adopted.** Regulatory decisions should be made without undue delay.

# Principles of Good Regulation



## Clarity

Regulations should be **coherent, logical, and practical**. There should be a clear nexus between regulations and agency goals and objectives whether explicitly or implicitly stated. Agency positions should be readily understood and easily applied.

## Industry Intent



- Clean sheet approach
  - Use correct process tied to governing regulation and Technical Specifications (TS)
  - If no process change, retained IMC 0326 concept/wording
- Guiding Principles
  - Operability is a binary decision
  - Operability is licensed operator responsibility
  - OD is separate from CAP

## Regulatory Engagement Strategy



- Applied lessons learned from successful and expedient engineering inspection streamlining effort
- NRC team composed of senior executive sponsor and headquarters and regional representation
- Industry team composed of regulatory and operations leaders empowered to make timely decisions
- Rotated meeting locations to encourage Regional participation and awareness
- Meetings addressed distinct, specific technical issues
- Industry and NRC alternated who is in “listening mode”

## Industry Engagement Strategy



- Incorporated lessons learned from CAP-02 effort
- Attended INPO Operations Managers/CFAM Working Meetings to provide updates and seek input/feedback
- Provided regular briefings to RUGs, NEI's Regulatory Affairs Working Group and NSIAC
- Promoted participation by BWROG and PWROG licensing committees
- Engagement will continue – and expand – through implementation

## Going Forward



- Continue Industry Communications
  - Commonality drives predictability
  - Workshops to promote alignment
- NEI 18-03 and IMC-0326 should be reasonably aligned
  - Operators and Resident Inspectors deserve it