NRC Reactor Oversight Process (ROP) Perspective From Commonwealth of Pennsylvania

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Background

- There are nine reactors at five sites in Pennsylvania (PA); nuclear power plants provide about 40% of the electricity in PA.

- PADEP has implemented a comprehensive nuclear safety and environmental monitoring program at PA nuclear power plants.

Background (continued...)

- **PADEP nuclear safety staff observe selected NRC Region 1 inspections at PA nuclear power plants.**

- **The following comments are based on PADEP participation in the ROP workshops and public meetings, interactions with the NRC inspectors and communications with members of the public.**

NRC Inspections/SDP Findings For PA Nuclear Plants (April 2000-March 2002)

Total Number of Findings	**137**
Number of "Green" Findings	**130 (95%)**
Number of "White" Findings	**7 (5%)**
One <u>Potential</u> "Yellow" Finding	**1**

Goal 1 – Maintain Safety

- **There are no signs of declining plant safety at any of the PA nuclear power plants since the implementation of the new ROP.**

- **NRC should continue to assess the long-term effectiveness of the ROP and validate the ROP assumptions, particularly as it relates to cross-cutting issues.**

Goal 1 – Maintain Safety (continued…)

- **The public is concerned that the reduction in the number of NRC resident inspectors and baseline inspection hours, combined with the industry staffing reductions, could adversely affect plant safety.**

Goal 2 – Enhance Public Confidence

- **The ROP provides a more scrutable, objective and predictable process for evaluating individual plant performance.**

- **NRC has been actively seeking stakeholders input to further improve the ROP, but the level of participation by the general public has been very low.**

Goal 2 – Enhance Public Confidence (continued…)

- **NRC needs to develop and implement an effective mechanism to receive public input continuously and on a plant specific basis.**

- **NRC resident inspectors should play a pro-active role in the NRC's public involvement activities within the local community.**

Goal 2 – Enhance Public Confidence (continued…)

- **The posting of plant specific PIs and assessment information on the NRC Website can help improve public confidence in the process.**

- **Unnecessary changes to the ROP may reduce public confidence in the process.**

Goal 3 – Improve Efficiency & Effectiveness

- ROP inspections focus on areas that are risk significant.
- PIs have helped licensees focus their attention on areas or programs that may need improvements.
- Developments of Risk-based PIs should help improve the ROP effectiveness.

Goal 3 – Improve Efficiency & Effectiveness (continued…)

- **NRC response time for some inspection findings are slow and has hindered the effectiveness of SDP.**

- **Additional time and data is needed to assess the ability of the ROP to detect, in a timely manner, adverse trends in the cross-cutting areas.**

Goal 4 – Reduce Unnecessary Regulatory Burden

- Licensees are spending less time responding to issues of low safety significance (i.e., non-cited violations).

- SDP is a resource-intensive process; the lack of standardized risk analysis tools has complicated the process.

Goal 4 – Reduce Unnecessary Regulatory Burden (continued…)

- Recommend periodic surveys of NRC regional staff and licensees to determine whether the ROP is making process toward achieving this goal.

Plant Security

- **PADEP requests that NRC have a government representatives-only workshop, to share information with states on:**
  - **General follow-up to NRC Threat Advisories**
  - **Review(s) of plant security and design basis threat**
  - **Security events or threats at specific nuclear power plants**
  - **Status of NRC performance-based evaluations**

- **Information provided could be classified as safeguards, with signed non-disclosure if needed.**