

## **Internal Stakeholder Survey Results**

An internal survey was completed in December 2002 to solicit and analyze stakeholder feedback regarding the effectiveness of the Reactor Oversight Process (ROP). A total of 236 responses were received from internal Nuclear Regulatory Commission (NRC) stakeholders, including resident and senior resident inspectors, regional-based inspectors and staff, senior reactor analysts, regional and headquarters line management, and headquarters technical and program staff employees.

The respondents selected answers from a computer-based program in eight major topic areas: (1) demographics, (2) overall ROP process, (3) assessment process, (4) inspection program, (5) performance indicators, (6) significance determination process, (7) feedback forms, and (8) other issues. The final section of the survey provided space to amplify responses or make additional comments. All respondent replies were anonymous and each questions had five possible answers (strongly agree, agree, disagree, strongly disagree, and unable to answer). Respondents selected "unable to answer" if they didn't know enough about the topic to make an informed judgment.

### **Background of ROP Internal Stakeholder Surveys**

In March 2001, the staff conducted a survey of those individuals within NRC who were involved with the ROP initial implementation. Most of respondents agreed that the ROP provided a realistic approach to oversight and assured that plants were being operated safely. They considered that the process provided appropriate regulatory attention to licensees with performance problems, was objective, and was an effective risk-informed approach to oversight. Compared to the previous process, most respondents considered the new ROP to have increased predictability, consistency, clarity, objectivity, timeliness, and efficiency. Respondents generally agreed that the ROP resulted in a reduction of unnecessary administrative burden on the NRC and unnecessary regulatory burden on stakeholders.

In November 1999, at the end of the 6-month pilot program, the staff conducted a survey to obtain feedback from staff who were familiar with the ROP at that time. When comparing the November 1999 survey with the March 2001 survey, respondents generally indicated more positive ratings after the initial implementation year compared to the pilot program period. The majority of respondents showed a marked increase in their understanding and acceptance of various components of the ROP, including the Significance Determination Process (SDP), the baseline inspection program, the assessment program, performance indicators (PIs), and internal and external communication activities. Although some NRC inspectors may have initially indicated skepticism of the significant changes being brought about by the new program, the 2001 survey indicated a much higher level of acceptance, and a better understanding and familiarity with the ROP.

### **December 2002 Survey**

The results of the eight survey sections are provided below. Note that the numbers in parentheses in the summary below represent the combined percentage of respondents who endorsed the stated view.

## **Section: Demographic Summary**

Survey respondents made selections for each of four demographic issues: position, work location, grade, and years of service with the NRC. The responses were analyzed for each of the demographic issues.

Most of the respondents were inspectors directly implementing the ROP. Almost a third (30%) were resident/senior resident inspectors with a 39% contribution coming from the regional-based inspectors or staff that included the senior reactor analysts. The remaining responses (31%) were from regional and headquarters line management and headquarters technical or program staff. An almost equal distribution of respondents came from headquarters (18%), Region I (20%), Region II (20%), Region III (21%), and Region IV (21%).

A majority of respondents were grade 14 or 15 (65%) with a 32% coming from grade 13 or below. Only 3% of the respondents were SES or SLS-level civil servants. Almost three-quarters (71%) of those surveyed had more than 10 years of service with the NRC and 13% had between 5 to 10 years service, while the remaining 16% had less than 5 years. The demographic results were not compared for the regions nor headquarters.

## **Section: Overall ROP**

The majority of respondents indicated that the ROP generally provides appropriate assurance that plants are being operated safely (80%) and provides appropriate regulatory attention to licensees with performance problems (76%) and a realistic approach to oversight (74%). Respondents further agreed that the ROP provides appropriate objectivity to the oversight process (82%). On the other hand, internal stakeholders indicated that they disagreed that the ROP provides appropriate identification of declining safety performance before there is a significant reduction in safety margins (51%). This was the only question where more respondents disagreed than agreed.

In a relatively consistent manner, respondents believed that the ROP provided an effective risk-informed approach to oversight (73%), provided sufficient attention to licensees whose performance is in the licensee response band (i.e., appropriateness of the baseline inspection and performance indicators for these licensees) (76%), and provided appropriate communication through use of plain language in official correspondence (e.g., inspection reports, letters to licensees) (74%).

Additionally, the stakeholders agreed that the ROP provides appropriate inspector and licensee communication (82%) and that the ROP is understandable and the procedures and output products are clear and written in plain English (74%).

Compared to the previous process, a vast majority of the respondents agreed that the new ROP generally increases consistency (85%) and is more risk-informed (91%). With relatively consistent agreement, they believed that the new ROP increases predictability (69%), objectivity (76%), and clarity (73%). Additionally, the stakeholders believed that the new ROP increases efficiency (70%) and maintains safety (76%). To a lesser extent, respondents felt that the new ROP increases timeliness (64%) and realism (65%). Slightly over half of the

respondents agreed that the new ROP increases effectiveness (56%) and reduces unnecessary administrative burden on the NRC (61%).

With respect to information on plant performance (e.g., inspection reports, PI data, Plant Issues Matrix (PIM) data, etc.) provided on the ROP Web site, a majority of the respondents agreed that the information is timely (89%), understandable (written in plain English) (87%), and organized for easy retrievability (90%). Additionally, the respondents believed the information is accurate (87%) and adequate to keep NRC internal stakeholders informed (74%).

### **Section: Assessment Process**

Respondents agreed that the assessment process provides an appropriate range of actions for safety issues (78%). Just over half (56%) of the respondents agreed that the assessment process provides for timely resolution of issues commensurate with safety significance. About two-thirds (67%) of the respondents felt that the assessment process applies appropriate enforcement actions.

In excess of three-quarters (80%) of respondents agreed that the assessment process focuses resources on areas of greatest safety significance. Over three-quarters of the respondents (76%) agreed that the assessment process minimizes duplication/rework in preparation for assessment meetings (i.e., mid-cycle, end-of-cycle, agency action review, public meetings).

A majority of the respondents felt that the assessment process provides objective levels of assessment (78%), provides understandable thresholds (76%) and agreed that the agency takes appropriate actions to address performance issues for those licensees outside of the Licensee Response Column of the Action Matrix (80%).

### **Section: Inspection Program**

A very high percentage of respondents agreed that the baseline inspection program inspection reports are communicated in a timely fashion (93%) and that the reports are communicated accurately (93%). Many internal stakeholders believed that the baseline inspection program appropriately inspects for and identifies risk significant issues (73%) and leads to objective findings whose significance can be clearly documented (69%). Approximately two-thirds of the respondents believed the baseline inspection program provides appropriate coverage of plant activities and operations important to safety (67%). Approximately half of the respondents felt that the level of effort for conducting each inspection is consistent with that estimated in the inspection procedure (58%).

Over three-quarters of the internal stakeholders agreed that the baseline inspection program procedures are adequate to address intended cornerstone attributes (80%) and that the procedures are clearly written (78%). They considered that baseline inspection program procedures place sufficient emphasis on planning (80%) and are conducted at an appropriate frequency (79%). The respondents felt that the baseline inspection program procedures adequately sample risk-important aspects of each inspectable area (72%).

Although most respondents agreed that the baseline inspection program report format adequately communicates relevant information to the licensee (71%), fewer believed that the

format communicates relevant information to NRC internal stakeholders (65%). Even lower is the respondents' agreement that the baseline inspection program report format adequately communicates relevant information to the public (56%). Note in the latter case, just more than one-third of the respondents disagreed (37%), with only a small percentage who could not answer the question (7%).

### **Section: Performance Indicators**

Closely grouped together in agreement, respondents felt that performance indicators provide useful information on risk-significant areas (70%), are clearly defined (71%), and provide an appropriate level of overlap with inspection findings (74%). A majority of the respondents (71%) agreed that the performance indicators are understandable (76%). Many internal stakeholders agreed that the performance indicators enhance public confidence (47%), while 31% were in disagreement and the remaining 22% indicated that they were unable to answer since they didn't know enough about the topic to make an informed judgement.

Only 62% of the respondents believed that the performance indicators helped to maintain safety, while 29% disagreed and 9% were unable to answer the question. With respect to providing an adequate indication of declining safety performance, only 38% of the respondents agreed, half (50%) disagreed, and 12% were not able to answer the question.

### **Section: Significance Determination Process**

Most of the respondents disagreed that the reactor safety SDPs are easy to use (80%). Likewise, while 40% of the respondents disagreed that non-reactor safety SDPs are easy to use, only 14% believed that they were easy to use and the remaining 46% of respondents were unable to answer the question due to minimal experience with the topic.

Respondents answered similarly in that they disagreed that SDP training is effective (67%) and that program guidance documents are clear (68%). The majority of the respondents disagreed that resource expenditures are appropriate (68%). However, respondents generally agreed that the SDP focuses NRC attention on safety significant issues (71%).

Respondents believed that the SDP provides a basis for effective communication of inspection findings to licensees (73%) and to a lesser degree provides a basis for effective communication of inspection findings to the public (60%). Over half (61%) of the stakeholders agreed that the SDP provides consistent results.

Over three-quarters of respondents considered the SDP results to be verifiable (76%). To a lesser degree, respondents considered that the SDP results correctly characterize the risk significance of inspection findings (61%) and are realistic (62%). Over half (59%) of the internal stakeholders agreed that the SDP results are accurate. Also, over half of those polled disagreed that SDP results are timely (61%) and 54% disagreed that the SDP results are based upon clear standards.

### **Section: Feedback Forms**

Respondents felt that the feedback forms were understandable and written in plain English (69%), were accurate (64%), and were responsive/address the issue(s) raised (54%). However, survey respondents disagreed that feedback forms sent to headquarters are timely (70%).

### **Section: Other Issues**

Survey respondents agreed that the information provided by the NRC appropriately keeps the public informed of the agency oversight activities related to the plants (78%), and that the timeliness goals specified in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," for documentation and data collection can reasonably be met (87%). The respondents felt that the supplemental inspection procedures provide sufficient information to confirm the adequacy of a licensee's root cause and corrective action effort (78%) and that the ROP has resulted in a reduction of unnecessary regulatory burden on stakeholders (76%).

A large majority of the internal stakeholders felt that issuing non-cited violations (NCV's) and relying on licensee's corrective action programs provides for an adequate approach to resolve issues of very low safety significance (i.e., green findings) (78%). Slightly over half of the survey respondents agreed that the resources needed to oversee licensees using the ROP are appropriate (55%). An almost equal percentage of respondents agreed and disagreed that the ROP fosters long-term self improvement by licensees (44% versus 43%, with 4% unable to answer the question). Most of the internal stakeholders disagreed that the ROP appropriately integrates and provides insights into cross-cutting areas (55%), while 33% agreed (12% were unable to answer the question).

### **Comparison of March 2001 and December 2002 Surveys**

The staff last conducted an internal survey in March 2001. The survey was designed to obtain feedback on the perceptions of those internal stakeholders familiar with the ROP at that time. The March 2001 survey garnered responses from 234 respondents from headquarters and the regional offices, whereas the December 2002 survey received a comparable 236 responses. The data from the two surveys was compared. The questions asked in both surveys were not completely identical although the surveys were similar enough to permit a comparison. For instance, the recent December 2002 survey made minor changes to the wording of some of the questions, modified the order of the questions to align with organizational metrics, and added a few additional questions to some sections. The survey data presented below provides the combined agree/disagree response for those questions from both surveys. The "unable to answer" responses are not included in the percentage calculations of agreement and disagreement when comparing between the two surveys.

There was little change between the surveys regarding whether the ROP generally provides appropriate regulatory attention to licensees with performance problems (76% in 2002 vs. 74% in 2001). However, there has been some decline in agreement that the ROP provides an effective risk-informed approach to oversight (73% in 2002 vs. 82% in 2001), sufficient attention to licensees whose performance is in the licensee response band (i.e., appropriateness of baseline inspection and performance indicators for these licensees) (76% in 2002 vs. 80%

in 2001), and appropriate identification of declining safety performance before there is a reduction in safety margins (49% in 2002 vs. 53% in 2001).

There was some decline in agreement that the ROP generally increases timeliness (64% in 2002 vs. 78% in 2001), reduces unnecessary administrative burden on the NRC (61% in 2002 vs. 69% in 2001), is more risk-informed (91% in 2002 vs. 96% in 2001), and increases efficiency (70% in 2002 vs. 75% in 2001). Respondents indicated a slight reduction in agreement that the information on plant performance (e.g., inspection reports, PI data, PIM data, etc.) provided on the ROP Web page is adequate to keep NRC internal stakeholders informed (74% in 2002 vs. 77% in 2001).

There was a reduction in agreement among respondents that the assessment process minimizes duplication/rework in preparation for assessment meetings (i.e., mid-cycle, end-of-cycle, agency action review, public meetings) (76% in 2002 vs. 88% in 2001), and provides for timely resolution of issues commensurate with safety significance (56% in 2002 vs. 76% in 2001). Respondents believed that the assessment process has remained virtually unchanged in its belief that the process focuses resources on areas of greatest safety significance (was 79% in both 2002 and 2001). Respondents further indicated a slight increase in agreement that the process provides understandable thresholds (76% in 2002 vs. 74% in 2001).

A greater percentage of respondents agreed that the baseline inspection program had a level of effort for conducting each inspection that is consistent with that estimated in the inspection procedure (58% in 2002 vs. 47% in 2001). They indicated a slightly reduced agreement that the baseline inspection program appropriately inspects for and identifies risk-significant issues (73% in 2002 vs. 78% in 2001) and that the inspection reports are communicated in a timely fashion (was 92% in 2002 vs. 95% in 2001). Although respondents indicated that the baseline inspection program procedures adequately sample risk important aspects of each inspectable area (72% in 2002 vs. 76% in 2001), a higher agreement was noted with procedures being clearly written (78% in 2002 vs. 75% in 2001) and conducted at an appropriate frequency (79% in 2002 vs. 73% in 2001). Internal stakeholders indicated expanded agreement that the baseline inspection program report format adequately communicates relevant information to the licensee (71% in 2002 vs. 63% in 2001). Furthermore, agreement that the report format adequately communicated relevant information to the public remained constant (60% in both 2002 and in 2001).

As compared to those in 2001, respondents to the 2002 survey indicated a lower agreement that the performance indicators enhance public confidence (60% in 2002 vs. 65% in 2001), provide useful information on risk-significant areas (70% in 2002 vs. 79% in 2001), and provide an adequate indication of declining safety performance (43% in 2002 vs. 53% in 2001). Moreover, the same percentage of internal stakeholders agreed that the performance indicators provide an appropriate level of overlap with the inspection program (74% in both 2002 and in 2001).

Internal stakeholders indicated decreased satisfaction with the SDP with respect to resource expenditures being appropriate (32% in 2002 vs. 60% in 2001), the reactor safety SDPs are easy to use (20% in 2002 vs. 39% in 2001), the non-reactor safety SDPs are easy to use (26% in 2002 vs. 37% in 2001), and that the SDP provides for consistent results (61% in 2002 vs. 72% in 2001). Fewer respondents agreed that the SDP results correctly characterize the

risk-significance of inspection findings (61% in 2002 vs. 71% in 2001) and that SDP results are accurate (59% in 2002 vs. 65% in 2001).

Respondents indicated a minimal increase in agreement in the most recent survey that responses to feedback forms are understandable and written in plain English (69% in 2002 vs. 67% in 2001). Also, more internal stakeholders agreed that the feedback responses are responsive/address the issue(s) raised (54% in 2002 vs. 45% in 2001). These stakeholders acknowledged, with virtually no change in agreement between surveys, that the feedback form responses are accurate (64% in 2002 vs. 65% in 2001).

More internal stakeholders from the December 2002 survey agreed that the ROP appropriately integrates and provides insights into cross-cutting areas (38% in 2002 vs. 30% in 2001). Compared to the earlier ROP internal survey, the December 2002 survey indicated a reduced agreement that timeliness goals specified in IMC 0305 for documentation and data collection can reasonably be met (87% in 2002 vs. 91% in 2001) and that the ROP has resulted in a reduction of unnecessary regulatory burden on external stakeholders (76% in 2002 vs. 79% in 2001). Moreover, fewer respondents thought that the ROP fosters long-term self improvement by licensees (51% in 2002 vs. 56% in 2001).

Specific feedback gained from these surveys either has been or will be considered in modifications to the appropriate area of the ROP. Further discussion and analysis of the internal survey results are included in the applicable portions of the program area discussions in this paper as well as in the ROP performance metric report in Attachment 3.