

Regulatory Impact Summary

Scope and Objectives

On December 20, 1991, the Commission issued a staff requirements memorandum directing the staff of the U.S. Nuclear Regulatory Commission (NRC) to develop a process for obtaining continual feedback from licensees and to report the feedback on the process to the Commission each year. The staff described the continual feedback process in SECY-92-286, "Staff's Progress on Implementing Activities Described in SECY-91-172, 'Regulatory Impact Survey Report—Final,'" dated August 18, 1992.

The feedback process requires regional management to solicit informal feedback from their licensees during routine visits to reactor sites. The managers record this feedback and forward the feedback forms to the Office of Nuclear Reactor Regulation (NRR) and the Office of Nuclear Security and Incident Response (NSIR). The regions, NRR, and NSIR then evaluate the concerns identified and take any necessary corrective actions. This process, which was implemented in October 1992, has given licensees frequent opportunities to comment on regulatory impact.

This enclosure reports on feedback received from licensees during the previous fiscal year. During this period, the staff received feedback from 68 reactor licensees regarding 139 issues, down from 191 over the previous period. The comments fell into two main categories—formal communication with licensees and inspector performance. Of the comments received, 86 percent were favorable and 14 percent were unfavorable.

One category discussed last year was licensee complaints regarding the number of regulatory changes in the security and safeguards area. NRC actions to improve consistency and stability in this area and the completion of a November 2007 public meeting appear to have been effective, as licensees raised no complaints this year.

The following sections summarize the feedback received and the staff's evaluation.

Formal Communication with Licensees

Feedback

Half of the licensees' comments concerned the effectiveness of communication between the NRC staff and licensees, and over 90 percent of these comments were favorable. Almost all comments were favorable with regard to communications with inspectors and regional management.

Many licensees said that communication was good or excellent, and others noted that the staff's communication skills have improved. A few licensees reported a communication problem related to the clarity of an inspection issue.

Evaluation

The staff concludes that the communication between the NRC and its licensees is effective and that the reported communication problems were isolated instances. The staff based this conclusion on the large number of routine interactions between the NRC and its licensees, combined with the large number of favorable comments and the relatively small number of unfavorable comments received during the past year.

The staff is aware of the importance of prompt and accurate communication and emphasizes this goal in the policy, guidance, and training for the inspection program. Effective communications will remain a challenge and will receive continuing attention from regional and headquarters management.

Inspector Performance

Feedback

One-quarter of the licensees' comments concerned inspector performance. This category covers a wide range of inspector practices, but it excludes issues involving communication with licensees discussed in the previous section. Almost 85 percent of the comments praised the NRC's inspection staff, noting the high quality of inspections, the technical competence, and the effective working relationship between the NRC and its licensees.

Licensees viewed inspections performed by resident and region-based inspectors as professional and of high quality. However, a few licensees made unfavorable comments regarding concerns or disagreements they had with the inspector's characterization of an inspection issue.

Evaluation

The staff concludes that inspectors, with the exception of isolated incidents, were professional and maintained effective working relationships. About 85 percent of the comments received this year were favorable. The staff reviewed the negative feedback for trends, but found only isolated incidents; therefore, no actions are needed at this time.

NRC management continues to emphasize to the staff the importance of professional conduct. Senior NRC managers reinforce these expectations in inspector counterpart meetings, workshops, training courses, and during site visits conducted in accordance with Inspection Manual Chapter 0102, "Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities." The staff will continue to closely monitor inspector performance.