

POLICY ISSUE INFORMATION

April 6, 2009

SECY-09-0054

FOR: The Commissioners

FROM: R. W. Borchardt
Executive Director for Operations

SUBJECT: REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT FOR
CALENDAR YEAR 2008

PURPOSE:

The purpose of this paper is to present the results of the staff's annual self-assessment of the Reactor Oversight Process (ROP) for calendar year (CY) 2008.

SUMMARY:

The results of the CY 2008 self-assessment indicate that the ROP met its program goals and achieved its intended outcomes. The staff of the U.S. Nuclear Regulatory Commission (NRC) found the ROP to be objective, risk informed, understandable, and predictable, and the ROP met the agency's strategic goals of ensuring safety and security. NRC staff maintained its focus on stakeholder involvement and continued to improve various aspects of the ROP. The staff implemented several ROP improvements in CY 2008 to address issues raised by the Commission, recommended by independent reviews, and obtained from internal and external stakeholder feedback.

The staff continues to improve the performance indicator (PI) program to ensure that the PIs are meaningful inputs to the ROP. The inspection program independently verified that plants were operated safely and securely, appropriately identified performance issues, and ensured the adequacy of licensee corrective actions to address the noted performance issues.

CONTACT: Ronald K. Frahm, Jr., NRR/DIRS
(301) 415-2986

The Significance Determination Process (SDP) remained an effective tool for determining the safety and security significance of identified performance issues and the staff met the SDP timeliness goal in CY 2008. The assessment program was revised to incorporate lessons learned from implementation of the safety culture enhancements and continued to ensure that the staff and licensees acted as necessary to address identified performance issues. The staff will continue to actively solicit input from the NRC's internal and external stakeholders and further improve the ROP based on stakeholder feedback and lessons learned.

BACKGROUND:

The staff performed the CY 2008 self-assessment in accordance with Inspection Manual Chapter (IMC) 0307, "Reactor Oversight Process Self-Assessment Program." In accordance with IMC 0307, the staff has issued an ROP self-assessment Commission paper each year before the Agency Action Review Meeting (AARM) and has briefed the Commission on the self-assessment results following the AARM. The ROP self-assessment program evaluates the overall effectiveness of the ROP in meeting its pre-established goals and intended outcomes.

In response to the staff's annual briefing, the Commission directed the staff to take the actions specified in the June 30, 2008, Staff Requirements Memorandum (SRM) M080604, "Briefing on Results of the Agency Action Review Meeting, June 4, 2008." In summary, these actions included looking for ways to clarify to industry and the public the meaning and use of "green" performance indicators within the ROP, evaluating possible improvements to the ROP self-assessment metrics for the PIs and the SDP, and making appropriate recommendations to the Commission if the staff evaluations of resident inspector demographics and the reasons for leaving the resident program reflect a need for additional measures. This paper and its enclosures address each of these items along with previous commitments and other direction from the Commission.

DISCUSSION:

The staff uses program evaluations and performance metrics to determine the effectiveness of the ROP in meeting its program goals and intended outcomes. The goals of the ROP include the four specific program goals of being objective, risk-informed, understandable, and predictable as well as the applicable organizational excellence objectives (e.g., openness and effectiveness) from the NRC's Strategic Plan for Fiscal Years 2008–2013. Each of these ROP goals supports the NRC's mission and characterizes the manner in which the agency intends to achieve its strategic goals of safety and security. The intended outcomes of the ROP, which help form its basis and are incorporated into the various ROP processes include the following:

- appropriately monitoring and assessing licensee performance,
- identifying performance issues through NRC inspection and licensee PIs,
- determining the significance of identified performance issues,
- adjusting resources to focus on significant performance issues,
- evaluating the adequacy of corrective actions for performance issues,
- taking necessary regulatory actions for significant performance issues,
- communicating inspection and assessment results to stakeholders, and
- making program improvements based on stakeholder feedback and lessons learned.

During the ninth year of ROP implementation (CY 2008), the staff conducted numerous activities and obtained data from many diverse sources to ensure that it performed a comprehensive and robust self-assessment. Data sources included the ROP performance metrics described in IMC 0307, recommendations from independent evaluations, insights from internal stakeholders based on the biennial survey and ROP internal feedback process, and feedback received from stakeholders at various meetings, workshops, and conferences. The staff also applied the direction and insight provided by the Commission through several SRMs. The staff analyzed this information to gain insights regarding ROP effectiveness and potential areas for improvement.

The staff evaluated the key ROP program areas, ROP communication activities, independent evaluations, ROP resources, and resident inspector (RI) demographics and staffing. As noted in the pertinent sections of this paper, the staff has also included several enclosures with additional detail to support the staff's self-assessment and conclusions.

ROP Program Area Evaluations

The staff performed evaluations in each of the four key program areas of the ROP: the PI program, inspection program, SDP, and assessment program. The results are summarized below and are discussed in more detail in Enclosure 1. In addition, the annual ROP performance metric report, available through the Agencywide Documents Access and Management System (ADAMS), provides the data and staff analysis for each program area metric (ADAMS Accession No. ML090690616).

PI Program — The staff continued to improve the PI program in CY 2008 to ensure the PIs provide useful insights and contribute to the identification of performance outliers. The staff also continued to look for leading indicators of declining performance as well as look for ways to modify or improve the existing PIs to ensure their effectiveness. All of the PI program metrics met their established criteria for CY 2008. The staff is currently working with industry to improve the Mitigating Systems Performance Index (MSPI) based on lessons learned and is assessing additional training needs for inspectors for the Safety System Functional Failures (SSFF) PI. Based on Commission direction, the staff worked to clarify for stakeholders the actual meaning of a "green" PI and evaluated and revised some of the PI metrics. Although the staff has endeavored to clarify the meaning and role of PIs in the assessment process, stakeholder feedback indicates an ongoing concern that PIs should better distinguish between levels of licensee performance. Specifically, there were a substantial number of critical comments from the internal survey indicating that the PI program does not provide meaningful insights and does not predict declining performance. The staff will continue to reinforce the message that a green PI represents performance that does not require additional NRC oversight, that PIs provide useful trending information, and that PIs are only a contributor to the identification of performance outliers. In addition, the staff will continue to refine existing PIs and explore options for introducing new PIs to ensure that the PI program provides useful insights and contributes to the identification of declining performance.

Inspection Program — NRC inspectors independently verified that plants were operated safely and securely, appropriately identified performance issues, and evaluated the adequacy of licensee corrective actions to address those performance issues. All inspection program metrics were met including the regions' completion of the required baseline inspection program for CY 2008. The staff performed its annual evaluation of the inspection procedures to

determine whether any additional improvements to the baseline inspections were warranted based on inspection findings identified during fiscal year (FY) 2008. The results of this evaluation will be considered during the more in-depth ROP realignment effort scheduled during CY 2009. The staff continued to use operating experience information in the baseline inspection program including the use of the Operating Experience Smart Sample process. The staff also recognizes the need to (1) better communicate how operating experience is currently considered in the ROP and (2) augment program documents to more systematically integrate operating experience into the inspection program. An NRC senior-level management working group also developed strategies and initiated actions to address challenges to RI retention issues. Internal survey responses were favorable on the quality of inspection reports and the adequacy of the inspection program's coverage of areas important to safety and security.

SDP — The SDP remains an effective tool for determining the safety and security significance of identified performance issues. The SDP met the timeliness goal of 90 days for a third consecutive year as well as meeting all other metrics. The staff issued several revised SDP guidance documents in 2008 including the two SDP appendices for the Public Radiation Safety and Occupational Radiation Safety cornerstones. The staff developed a special SDP to evaluate findings identified during the performance of Temporary Instruction (TI) 2515/171, "Verification of Site Specific Implementation of B.5.b Phase 2 & 3 Mitigating Strategies." Additionally, in response to Commission direction, the staff added the materials control and accountability (MC&A) attribute to the security baseline inspection program and developed the MC&A SDP. The staff continues to develop analytical tools for SDP and other staff risk applications to ensure that the standardized plant analysis risk (SPAR) models reflect the as-built, as-operated plant configuration and provide more consistent results when risk assessments are performed. This effort includes developing new generic low power/shutdown SPAR models. The responses to the internal survey indicate that the staff members are confident about the performance of the SDP although many indicated that additional training would be beneficial. The staff is working to meet this need and will address this issue in CY 2009.

Assessment Program — Staff implementation of the assessment program ensured that staff and licensees took necessary actions to address and focus on performance issues. All of the assessment metrics met their established criteria for CY 2008. The staff compiled lessons learned from the initial 18-month implementation of the safety culture enhancements to the ROP and further enhanced the ROP safety culture guidance documents. Additional changes may be necessary in CY 2009 or CY 2010 to better align with the Commission's safety culture policy statement once it has been finalized. The staff plans to explore ways to utilize cross-regional experience to further improve the implementation of the substantive cross-cutting issue guidance. The staff also revised the definition of a "repetitive degraded cornerstone" to address concerns that the potential existed for two lingering PI inputs to drive a licensee into the "Multiple/Repetitive Degraded Cornerstone" column (Column 4) of the Action Matrix. The staff established ways to better integrate traditional enforcement outcomes into the assessment process and is in the process of incorporating the implementation details into ROP guidance documents. The staff noted a decrease in the number of sites in the "Degraded Cornerstone" column (Column 3) and Column 4 of the ROP Action Matrix in CY 2008 and will continue to monitor the potential issue first identified in CY 2007 when the number of sites in Columns 3 and 4 had increased.

ROP Communication Activities

In CY 2008, the staff continued to emphasize stakeholder involvement and open communication regarding the ROP. The staff used a variety of communication methods to ensure that all stakeholders could access ROP information and had an opportunity to participate in the process and provide feedback. As discussed below, the staff sought and implemented improvements to the ROP based on feedback and insights from all stakeholders.

External Stakeholder Interface — The staff conducted monthly public working-level meetings with the Nuclear Energy Institute (NEI), the industry, and interested stakeholders to discuss the status of ongoing refinements to the ROP. Based on stakeholder feedback, the staff added detail to the agenda in the meeting notices so that potentially interested stakeholders could determine beforehand whether the NRC planned to discuss topics of interest. The staff also offered the opportunity for public comment at the end of each topical area to enhance the public's ability to engage relevant staff members on topics discussed during these meetings. The staff also conducted public meetings in the vicinity of each operating reactor to discuss the results of the NRC's assessment of the licensee's performance. These annual meetings provide an opportunity to engage interested stakeholders on the NRC's role in ensuring safe and secure plant operations. The staff published the Annual Report to Congress on the Security Inspection Program in July 2008 to continue to communicate information and results related to the Security cornerstone. The staff also sponsored a breakout session at the Regulatory Information Conference in March 2008, which focused on getting ahead of performance issues, and discussed additional ROP topics during the regional breakout sessions. The staff plans to issue its next external survey to evaluate ROP effectiveness and gather stakeholder insights in October 2009. These outreach efforts have resulted in valuable feedback and ROP improvements.

The NRC has placed a high priority on communicating with licensees and other Federal agencies including the U.S. Department of Homeland Security, the Homeland Security Council, the Federal Bureau of Investigation, and the intelligence community. This communication includes, in part, assessment of and response to the changing elevated threat environment, review and inspection of revised security plans for all 104 nuclear power reactors, and clarification of requirements for orders issued since September 11, 2001. This coordinated effort, lessons learned from program implementation, and ongoing rulemaking activities should help improve consistency and provide for a more stable regulatory environment. The staff is continuing outreach efforts with various stakeholders to help ensure timely communication and involvement in regulatory activities.

The staff maintained and enhanced the NRC's Web pages to communicate current ROP-related information and results. The staff continues to maintain the ROP Web pages to ensure that they communicate accurate information. In addition, the staff is working to improve internal processes to ensure that ROP information is reported more promptly. The improved process will facilitate public access to program documents and streamline the staff process for updating changes to procedures.

Internal Stakeholder Interface — The staff of the Office of Nuclear Reactor Regulation (NRR) and the Office of Nuclear Security and Incident Response (NSIR) continued to conduct biweekly conference calls with regional management and staff to discuss current issues associated with the ROP. The staff also met periodically with regional managers to discuss more complex ROP

topics and issues. In addition, the staff participated in each region's inspector counterpart meeting so that regional staff and management could provide feedback on ROP implementation.

The staff administered its biennial internal survey in October 2008 to evaluate program effectiveness and gather direct feedback from the staff responsible for implementing the ROP. The responses to the internal survey were generally positive and showed a similar level of satisfaction when compared with the previous internal survey in CY 2006. Most of the internal survey questions and responses contributed directly to the annual ROP performance metrics and self-assessment. Enclosure 2 provides more detail on the results of the internal survey. The staff analysis of the survey responses appears in Enclosure 1 in the applicable portions of the program area evaluations as well as in the annual ROP performance metric report (ADAMS Accession No. ML090690616). In addition, the staff plans to prepare a consolidated response to the internal survey to more specifically address some of the comments, and the main themes derived from the comments, and will make this response available to internal stakeholders through the ROP Digital City Web site. A consolidated table including all internal and external survey results since inception of the ROP along with the staff's evaluation and response is available on the ROP Web page entitled, "ROP Program Evaluations and Stakeholder Feedback."

The NRC staff frequently updated the ROP Digital City Web site to include recent and useful information for internal stakeholders. The NRC staff continued to issue the inspector newsletter on a quarterly basis to share value-added findings, best practices, inspection guidance, and regulatory issues that are timely and have wide application and interest to inspectors and staff implementing the ROP. Each of the four regions has a newsletter editorial board member who identifies potential topics and authors for newsletter articles and provides technical review of the content. The RIs, NRR and NSIR headquarters staff, and staff in the regional offices write the articles. Printed and/or electronic copies are distributed, and the newsletter is also available on the NRR ROP Digital City internal Web site. The Inspector Newsletter is also represented as a community of practice on the NRC's Knowledge Management website, which provides a place for inspectors to seek and discuss information that appeared in newsletter articles. The staff effectively utilized and continued to improve the initial and continuing inspector training programs to produce and maintain well-qualified competent inspectors. Based on the internal survey results and less formal feedback, inspectors appear to be generally satisfied with the training necessary to implement the ROP, but they have identified areas where they would benefit from additional training. These topic areas include the SDP, safety culture, the SSFF PI, and the computer system used to track inspection reports and findings (Reactor Program System). The staff plans to provide additional training in these areas in CY 2009.

The ROP feedback process allows the NRC staff to identify concerns or issues and recommend improvements related to ROP policies, procedures, or guidance. Based on the results of the recent internal survey, the staff believes that improvements made in CY 2006 for tracking feedback forms increased the timeliness of and stakeholder satisfaction with the internal feedback process. However, the staff recognizes the potential for additional process improvements to further increase overall efficiency and reliability and plans to address them in CY 2009.

ROP Performance Metrics and Independent Evaluations

ROP Performance Metrics — Based on the NRC staff's review, all of the 45 performance metrics for the ROP met the established criteria. All eight metrics in the PI program area, all seven metrics in the inspection program area, all six metrics in the SDP area, all eight metrics in the assessment program area, and all sixteen overall ROP program metrics met the established criteria. The staff further discusses these performance metrics in the program area evaluations in Enclosure 1 as well as in the annual performance metric report (ADAMS Accession No. ML090690616).

Independent Evaluations — In addition to the ROP self-assessment program, several independent evaluations have been performed in the past few years. These evaluations generally provided favorable results, but they also suggested potential areas of improvement. Most recently, the staff hired FocalPoint Consulting Group to perform an independent evaluation of the reactor oversight and incident response programs in 2008 with the objective of developing recommendations to strengthen program performance. Overall, FocalPoint found the programs to be effective in accomplishing their mission of providing reactor oversight and incident response but provided a number of findings and recommendations for the staff's consideration. The final report, "Independent Evaluation of the Reactor Oversight and Incident Response Program," dated December 31, 2008 (ADAMS Accession No. ML090680415), presents details of these findings and recommendations.

The staff addressed the Government Accountability Office (GAO) recommendations to improve the oversight of safety culture as noted in GAO-06-1029, "Nuclear Regulatory Commission: Oversight of Nuclear Power Plant Safety Has Improved, but Refinements Are Needed," dated September 27, 2006 (ADAMS Accession No. ML062720030). The report included three recommendations for safety culture. The NRC formally responded to the GAO report on November 27, 2006, and provided an update in its annual status report to the GAO on March 12, 2007, and on March 28, 2008. The staff considers action on these recommendations complete and is recommending closure to GAO.

The staff addresses several recommendations from these and other independent evaluations in the enclosures to this paper. Greater detail on the independent evaluations of the ROP along with the staff's response and resultant program improvements appear on the ROP Web page entitled "ROP Program Evaluations and Stakeholder Feedback."

Regulatory Impact — The staff also received and evaluated feedback from licensees as part of the regulatory impact process. The regulatory impact process was established in 1991 based on Commission direction to develop a process for obtaining feedback from licensees and reporting the feedback to the Commission. Over the past year, the staff received feedback from 70 reactor licensees on 146 issues. Of the comments received, 92 percent were favorable, and 8 percent were unfavorable. The comments fell into two main categories — inspector performance and formal communication with licensees. Enclosure 3 provides a summary of the feedback received, the staff's evaluation, and the proposed improvement actions.

Industry Performance Trends — The NRC also collects and monitors industry-wide data to assess whether the nuclear industry as a whole is maintaining the safety performance of operating plants. The NRC also uses these industry level indicators as feedback for improving the ROP. In FY 2007, the staff completed the development of the Baseline Risk Index for

Initiating Events (BRIIE), an indicator that weights each initiating event according to its relative contribution to industry core damage frequency. The staff will report the FY 2008 results of the Industry Trends Program including the results of the new BRIIE to the Commission in an annual paper that complements this paper. The results of the Industry Trends Program will also be reviewed at the AARM.

ROP Resources

Overall staff effort in FY 2008, as reflected in expended hours, decreased by 4.3 percent compared with expended hours in FY 2007. Baseline inspection hours decreased in 2008 resulting primarily from the reduced frequency in performing Inspection Procedure (IP) 71111.21, "Component Design Bases Inspection," and fewer hours being charged to IP 71152, "Identification and Resolution of Problems." The regions conducted fewer of these major inspections in 2008, and together these inspections account for almost 70 percent of the reduction in direct baseline inspection hours. The hours charged to other baseline procedures remained relatively unchanged. As in previous years, all four regions completed the required baseline inspections in CY 2008.

Plant-specific inspection effort increased notably in FY 2008 compared with that in FY 2007. The increase reflects increased supplemental inspections based on the higher than normal number of plants in Columns 3 and 4 of the Action Matrix in 2007, an increase in reactive inspections, and several inspections in the security cornerstone. Generic safety issues (GSI) inspections are typically one-time inspections of specific safety and security issues with significant variability in effort possible from year to year. The increased effort related to GSI inspections in FY 2008 reflects the implementation of several temporary instructions. Enclosure 4 discusses ROP resources in more detail.

Resident Inspector Demographics and Site Staffing

As directed in an SRM dated April 8, 1998, the staff developed measures to monitor and trend RI demographics and report the results to the Commission annually. The staff also developed a 90 percent site staffing metric in 2008 which is included with the annual analysis. The staff concluded that the RIs and senior resident inspectors (SRI) remain knowledgeable and experienced although the turnover in the RI ranks over the last several years has resulted in a decline of on-site inspection experience, which may result in challenges in implementing the inspection program. While the most recent turnover rates in both RI and SRI ranks have improved, it still appears that enhancements are warranted to maintain an experienced and stable RI and SRI program. These enhancements will be the subject of a separate paper to the Commission. The staff plans to continue to closely monitor resident demographics and site staffing in 2009. Enclosure 5 provides detailed analyses of the 2008 RI demographics and site staffing.

Similar to the RI program, recruiting and retaining other regional specialists such as operator license examiners may pose challenges in the future. The staff will continue to monitor the staffing levels of regional specialists and will take action as necessary.

COMMITMENTS:

Prior Commitments — The staff made four commitments in last year's ROP self-assessment to improve the efficiency and effectiveness of the ROP. The following summarizes the actions taken by the staff to address these four commitments:

- (1) The staff performed its lessons-learned review of the MSPI and is currently working with its stakeholders to improve the PI. The staff has continued to evaluate other PI improvements to make the program a better input to the ROP assessment process as described in Enclosure 1.
- (2) The staff explored ways to ensure site coverage and continuity within the resident program and ensure that vacancies in the RI program are filled in a timely manner with experienced individuals as described in Enclosure 5.
- (3) The staff monitored SDP timeliness and developed additional improvements to streamline the SDP program with the inspection program as described in Enclosure 1.
- (4) The staff enhanced ROP inspection and assessment guidance based on the lessons-learned evaluation of the safety culture enhancements as described in Enclosure 1. Additionally, the staff assessed the temporary increase in the number of sites in Columns 3 and 4 of the ROP Action Matrix as described in Enclosure 1.

New Commitments — As described in this paper, the staff plans the following eight significant actions or activities to improve the efficiency and effectiveness of the ROP in CY 2009:

- (1) The staff will continue to implement improvement initiatives based on its MSPI lessons learned review and will provide training on the SSFF PI to the inspection staff.
- (2) The staff will revise program guidance to better integrate operating experience into the ROP inspection and assessment processes.
- (3) The staff will provide recommendations in a separate paper to the Commission detailing potential improvements to the attraction and retention practices for RI and SRI staff.
- (4) The staff will develop and implement additional SDP training to ensure the inspectors remain efficient and effective in determining the safety and security significance of identified performance issues.
- (5) The staff will begin developing models for low-power and shutdown situations for use in the SDP.
- (6) The staff will revise program guidance to better integrate traditional enforcement outcomes into the assessment process.
- (7) The staff will revise program guidance, as necessary, to better align with the Commission's safety culture policy statement once it has been finalized.

- (8) The staff will explore ways to utilize cross-regional experience to further improve the implementation of the substantive cross-cutting issue guidance.

The staff will include the status of these commitments and other program improvements noted in this paper in the CY 2009 ROP self-assessment.

CONCLUSIONS:

The self-assessment results for CY 2008 indicate that the ROP provided effective oversight as demonstrated by meeting the program goals and achieving its intended outcomes. The staff continues to experience challenges in certain areas and recognizes the need for further improvement. The ROP was successful in being objective, risk-informed, understandable, predictable and successful in ensuring openness and effectiveness in support of the agency's mission and its strategic goals of safety and security. The NRC appropriately monitored operating nuclear power plant activities and focused agency resources on performance issues in CY 2008, and plants continue to receive a level of oversight commensurate with their performance. The staff continues to emphasize stakeholder involvement and improve various aspects of the ROP as a result of feedback and lessons learned.

RESOURCES:

NRC headquarters and regional resources are needed to conduct the periodic assessment and realignment of ROP inspection procedures, ROP annual program assessment, mid-cycle and end-of-cycle licensee performance assessment; to revise and maintain the NRC Inspection Manual; and to perform all ROP management and oversight activities. The staff estimates that 56.0 full-time equivalent (FTE) staff members and \$652,000 will be needed for FY 2009 and that 56.5 FTE and \$875,000 will be needed for FY 2010 to conduct these NRR-funded activities. These resources break down as follows:

For FY 2009:

PA 122148	14.7 FTE regions	6.0 FTE HQ	= 20.7 FTE and \$ 425,000
PA 122150	13.0 FTE regions	22.3 FTE HQ	= 35.3 FTE and \$ 227,000

For FY 2010:

PA 122148	14.7 FTE regions	6.0 FTE HQ	= 20.7 FTE and \$ 705,000
PA 122150	11.0 FTE regions	24.8 FTE HQ	= 35.8 FTE and \$ 170,000

NSIR estimates that approximately 6.7 FTE will be needed for FY 2009 and 9.5 FTE will be needed for FY 2010 for its ROP management, development, and oversight activities and for licensee performance assessment. The Office of Nuclear Regulatory Research (RES) estimates that approximately 1.7 FTE and \$923,000 will be needed for FY 2009 and that 1.9 FTE and \$771,000 will be needed for FY 2010 for its ROP assistance programs. The NSIR and RES effort is budgeted and performed by the respective offices (separate from the NRR effort). The staff does not anticipate any resources beyond those already included in the current budget requests for FY 2009 and FY 2010 to be needed for these activities. Resources required in future years beyond FY 2010 would be addressed during the Planning, Budgeting, and Performance Management (PBPM) process of the respective year.

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper and determined that there is no financial impact.

/RA/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. Reactor Oversight Process Program Area Evaluations
2. Stakeholder Survey Results
3. Regulatory Impact Summary
4. Reactor Oversight Process Resources
5. Resident Inspector Demographics

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper and determined that there is no financial impact.

/RA/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. Reactor Oversight Process Program Area Evaluations
2. Stakeholder Survey Results
3. Regulatory Impact Summary
4. Reactor Oversight Process Resources
5. Resident Inspector Demographics

WITS200100034/EDATS: SECY-2008-0221
WITS200800299/EDATS: SECY-2008-0420

ADAMS Accession No.: ML090540513 *Concurrence via email

OFFICE	DIRS/IPAB	Tech Editor	DIRS/IPAB:BC	DIRS/IRIB:BC	DIRS:D	PMDA
NAME	RFrahm	KAzariah-Kribbs*	RFranovich	TKobetz	FBrown	TDietz*
DATE	03/06/2009	03/06/2009	03/18/2009	03/20/2009	03/23/2009	03/20/2009
OFFICE	RGN I	RGN II	RGN III	RGN IV	NSIR	OCFO
NAME	DLew* (CKhan for)	LWert*	CPederson* (JLara for)	DChamberlain* (AVegel for)	RZimmerman (WDean for)	RMitchell* (TPulliam for)
DATE	03/20/2009	03/18/2009	03/20/2009	03/06/2009	03/03/2009	03/26/2009
OFFICE	OGC	OE	NRR	EDO		
NAME	MClark*	CCarpenter*	ELeeds	RBorchardt		
DATE	03/13/2009	03/13/2009	03/27/2009	04/09/2009		

OFFICIAL RECORD COPY