

Oversight Program Meeting Notes and Themes

During the open session of the workshop the NRC staff and external stakeholders engaged in a discussion on ideas and areas to improve the oversight program. The notes below provide a summary of the discussions and cover different topics related to the oversight program.

- Discussion theme: Acknowledgement or credit for good performance and how it is reflected on inspection effort
 - NEI discussed the idea of providing credit to a facility with demonstrated good performance and the possibility for a reduction of core inspection effort.
 - NRC staff and stakeholders discussed what criteria could be used to define good performance by a licensee and if good performance should be a consideration on the level of effort for the core inspection program.
 - NRC staff query on what would be defined as “good performance” and criteria. Level of years without findings or trends indicative of declining performance? Is 5 years, 3 years without findings or declining trends a good measure?
 - NRC staff provided its perspective on the concept of reducing the core based on good performance. The staff indicated that operating experience and past performance will be evaluated for the development of any recommendations to the oversight program. The staff also indicated that it could consider optimizing the core inspection effort assuming good performance. However, the staff stated that specific criteria should be developed to determine what set of conditions allow for a given licensee to be considered a good performer and therefore be eligible for an optimized core effort. The staff also stated that allowing a given licensee to go under the specified core inspection effort may impact the ability of the NRC to maintain its independence (NRC Principles of Good Regulation).
 - Commenter: NRC should consider the results of the Licensee Performance Review (Inspection Manual Chapter 2604) for the optimization of the core inspection. Specifically, if the licensee has not had an “area needing improvement” in the past few years.

- Discussion theme: Enhancements to the core Inspection effort
 - Commenter: inspectors unnecessarily prolong their inspection hours to meet the “estimated resources” (hours) provided in inspection procedures.
 - The NRC staff stated that inspectors are empowered to close-out inspection once the inspection sample and desired areas for assessment have been evaluated even if this is less than the estimated resources stated in App. B Table 1.
 - The NRC stated that the WG charter includes an analysis of past inspection data and trends as part of the task to develop recommendations to the inspection program.

- The NRC staff stated that the WG charter includes a review of Appendix B Table 1 which would include a review of scope, hours, and frequency as part of the task to develop recommendations to the inspection program.
- Discussion theme: Resident Inspector Program
 - Commenter: The NRC should look to expand the inspection areas and responsibilities of the Resident Inspector (RI). Specifically, in the inspection area of fire protection.
 - Commenter: The NRC should look to expand RI responsibilities to include, transportation security, waste management and environmental. An idea could be to allow the RI to inspect year one and two of the inspection area and year three bring an inspector from the Regional office to allow for a different inspector to look at the same inspection area. This in fact could reduce the amount of travel, while maintaining the same level of effort per inspection area.
 - Commenter: The NRC should look for RI to perform more administrative close out of items such as event notifications, because utilizing expertise on-site is more efficient.
 - The NRC staff clarified that the RI duties currently include closing out event notifications, however in some instances the RI seeks assistance for closure in areas of special technical discipline if it is outside the expertise of the RI.
 - Commenter: Credit for the Federal government's existing oversight of Naval Reactors programs should be considered by NRC staff. In many cases, it is a matter of dual-regulation.
- Discussion theme: Management Measures and Corrective Action Program
 - Commenter: The NRC staff should look for overlaps in the Corrective Action Program (CAP) inspection procedure (IP 88161) and the vendor CAP inspections performed by the operating reactors business line. Commenter stated that having an approved CAP adds an inspection procedure to their respective core effort that results in additional inspection effort for the licensee. Commenter requested the NRC to continue to evaluate incentives for licensees to have an approved CAP given the importance it plays on safety by reviewing overlaps to look for a reduction in the core inspection hours.
 - Commenter: The NRC should consider that licensees have some form of corporate-wide CAP. In addition, multiple IPs have criteria to assess corrective actions at the facilities.
 - Regarding the overlap between the CAP IP and the vendor CAP inspections, NEI also asked the NRC staff to review areas of overlap and potential reduction.
- Discussion theme: Other ideas.
 - Commenter: The NRC should consider implementing decision points in the core inspection effort to determine when a given inspection area should be assessed. The commenter specifically described the Emergency Preparedness module as one that could be evaluated given that has an annual and biennial inspection procedure.

- The commenter suggested forgoing the annual inspection during the year of the biennial exercise. Commenters also suggested credits for force on force exercises.
- Commenter: NRC should consider a reduction on the hours spent on Material Control and Accounting for each type of facility. Commenter stated that 152 hours for Cat 1 is a significant effort. Commenter also stated there are rarely any changes to FNMCP's, in which some elements shouldn't have to be inspected every time.
- Commenter: NRC should consider combining
 - 1) the waste management inspection area with radiation protection and
 - 2) transportation with plant operations (as defined in IMC 2600).
- Commenter: NRC should consider the level of effort spent by licensees providing and uploading documents for inspection preparation to ensure there is no redundancy on the documents requested.
- Commenter: NRC should consider existing Agreement State inspections, identify areas of overlap or redundancy, and how this information could be used as basis for optimizing the core inspection effort.
- NRC Staff Takeaways:
 - NRC staff to perform a review of all IPs under IMC 2600 App B Table 1 to determine if overlaps and/or efficiencies exist including (frequency and estimated hours).
 - NRC staff to consider how licensees history of good performance can be factored in the development of enhancements to the inspection core effort. The NRC staff will also consider criteria to be used to define good performance including the results of the licensee performance reviews.
 - NRC staff to consider expanding inspection areas and responsibilities to the RI.
 - NRC staff to consider potential overlaps of oversight from other Federal Agencies and Agreement state inspections.
 - NRC staff to evaluate potential overlaps between the CAP IP and the vendor CAP inspections and determine if efficiencies can be gained.