

April 19, 2000

Dr. Dana A. Powers, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: REVISED REACTOR OVERSIGHT PROCESS

Dear Dr. Powers:

I am responding to your letter to Chairman Meserve dated March 15, 2000, that provided the results of the Committee's review of the technical aspects of the Revised Reactor Oversight Process (RROP). In it you noted that the RROP makes NRC assessments and actions more objective, predictable, and understandable to both the public and industry. Although you recommended Commission approval for initial implementation of the RROP at all plants, your letter identified several issues for continued consideration. A response to the major issues follows.

1. Issue: The staff should look for methods to implement the process in ways that it can be easily changed.

Staff Response: The staff recognizes that adjustments to the RROP will be necessary as the staff and external stakeholders gain experience with the process. In the coming months, the staff intends to identify measures to monitor and evaluate the performance of the process and overall industry performance. The results of the staff's evaluation of RROP efficacy, along with stakeholder feedback, will be used to identify needed changes and will be reported to the Commission after the first year of implementation and yearly thereafter. In addition, the staff is developing a process to consider ongoing feedback and recommendations in a structured way to identify and implement needed changes. The change process will mirror those activities that were used to develop, test and implement the RROP.

2. Issue: The choices of the PIs and the associated thresholds remain controversial.

Staff Response: The staff acknowledges that additional improvements can be made to the performance indicators (PIs) and their thresholds. Several efforts are underway to improve performance indicators in some areas and develop new indicators in others. These are described in SECY-00-0049, "Results of the Revised Reactor Oversight Process Pilot Program." However, with respect to the performance indicators, several points should be noted. First, the PIs sample important aspects of performance. PIs together with risk-informed inspection provide an indication of the plants' overall safety performance. They are not intended to be all-encompassing.

Secondly, the purpose of the green/white threshold, with the exception of the barrier integrity PIs, is to identify outliers from nominal industry performance. The staff is continuing to work with stakeholders to address site-specific issues associated with the PIs. Although these issues will likely lead to design specific thresholds in some cases and may lead to site-specific thresholds in others, generic thresholds may be appropriate in many cases. Finally, a purpose of the RROP is to ensure that licensees maintain reactor safety and provide for timely NRC response to adverse trends. It is not designed to push continued performance improvements at plants already operating at acceptable performance levels.

3. Issue: The SDP is incomplete. Further development of this process and the analytical tools it uses is required for full implementation.

Staff Response: The staff acknowledges that additional SDP improvements can be made. The staff's plans are outlined in SECY-00-0049 and include implementing SDPs for evaluating inspection findings associated with shutdown and containment issues and improving the SDP to account for the influence of external events. Findings from the pilot program and the lessons learned workshops have been incorporated into development of these additional tools. A screening tool for shutdown issues has been developed and will be used during initial implementation. Work will continue to develop a more refined process. The SDP for containment issues has been developed and will be used during initial implementation. A screening tool to address external event issues will be used during initial implementation while the staff evaluates if additional revisions to the reactor safety SDP need to be made. The staff is also developing an SDP to address inspection findings associated with licensed operator re-qualification and human performance issues. This SDP will be tested during the early stages of initial implementation.

It should be noted that the SDP is a tool to be used by inspectors to provide an order-of-magnitude approximation of the risk significance of inspection findings. The staff has a cadre of highly trained risk analysts who are able to use much more sophisticated tools and models to refine the assessments performed by the SDP when needed. In the absence of an appropriate SDP, the staff will continue to rely on these risk analysts. Consequently, no delay in full implementation is warranted.

4. Issue: Additional PIs will be needed for full and effective implementation of the RROP.

Staff Response: As noted above, the staff acknowledges that improvements can be made to the performance indicators. The staff agrees that additional PIs may provide further objective insights into licensee performance. However, the staff does not agree that additional PIs are required for full and effective implementation. The NRC has traditionally relied on the results

of the inspection program to provide insights related to licensee performance. The RROP combines the use of PIs with an inspection program that has been developed to evaluate more risk-significant aspects of a licensee's performance. Together, these provide the basis for conclusions regarding licensee performance and subsequent regulatory actions. For those areas not covered by PIs, the staff will continue to rely on inspection activities to provide the necessary information to assess licensee performance.

Sincerely,

/RA Frank J. Miraglia Acting For/

William D. Travers
Executive Director
for Operations

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
SECY

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