

MEMORANDUM TO: Those on the Attached List

FROM: William M. Dean, Chief
Inspection Program Branch
Division of Inspection and Program Management
Office of Nuclear Reactor Regulation

SUBJECT: INSPECTION PROGRAM BRANCH'S TRANSITION PLAN

Attached is the Inspection Program Branch's (IIPB) transition plan for overseeing initial implementation of the revised Reactor Oversight Process (ROP). Much of what is contained in the plan is directly related to the specific conduct of IIPB activities. However, a number of the items which are described are related to your own activities which may involve either direct implementation of the ROP or support to ongoing improvements or development activities. Therefore, I am providing you with a copy of this transition plan for your use in either developing a corollary plan or to ensure that you are aware of any pertinent issues which IIPB is tracking as part of its continuing oversight of the ROP.

In reviewing the transition plan, I would appreciate any comments or feedback that you may have. Please provide me with any items that you believe should be captured by this transition plan as well. One item of note that I want to bring to your attention is that as of April 3, 2000, the Transition Task Force (TTF) that was developed to provide oversight of the ongoing developmental work and execution of the pilot program has been subsumed into the overall IIPB organization. While several of the roles fulfilled by members of the TTF will be retained, they will be under the auspices of the two section chiefs, Mike Johnson (Performance Assessment) and Cornelius Holden (Inspection Program) as defined in the transition plan.

If there are any significant changes to this plan, I will provide them to you.

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Distribution:
IIPB R/F

ACCESSION #: ML003699478
TEMPLATE #: NRR-106

* See previous concurrence.

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OFFICE	IIPB:DIPM									
NAME	WMDean									
DATE	04/ /00									

Addressees - Memorandum Dated

SUBJECT: INSPECTION PROGRAM BRANCH'S TRANSITION PLAN

NRR

S. Collins
R. Zimmerman
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Other Offices

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B. Hayden, OPA
M. Tschiltz, OEDO
M. Satorious, OEDO
L. Portner, OCA
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W. Borchardt, OE

RES

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HR

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Regional Offices

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L. Plisco, RII
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REVISED REACTOR OVERSIGHT PROCESS TRANSITION PLAN

This transition plan describes the change management strategies and program oversight methods for facilitating the initial implementation of the revised reactor oversight process (RROP) which begins in April 2000. The efforts needed to inform both the staff and external stakeholders on the process and to prepare them to begin initial implementation have been completed. This plan describes ongoing activities to meet the following objectives:

- Provide accurate, pertinent and timely information to all stakeholders
- Gather and appropriately respond to stakeholder feedback
- Appropriately deal with negative perceptions and rumors
- Maintain ongoing, positive interactions with all stakeholders
- Collect and analyze pertinent information to make appropriate process adjustments after the end of the first year of initial implementation

The agency's program goals provide an overarching theme for the RROP and the staff's efforts to assure that the efficacy of the RROP is obtained. These are imbedded in the following key policy messages that need to be achieved and reinforced in communications with stakeholders:

1. Maintain safety by establishing and implementing a regulatory oversight process that assures that plants are operated safely.
2. Enhance public confidence by increasing the predictability, consistency, and objectivity of the oversight process and providing timely and understandable information.
3. Improve effectiveness, efficiency, and realism of the oversight process by implementing a process of continuous improvement.
4. Reduce unnecessary regulatory burden through the consistent application of the process and incorporation of lessons learned.

The staff's efforts in managing the transition to initial implementation need to consider the seven distinct groups of stakeholders as defined in the table below.

INTERNAL	EXTERNAL
Group A: Headquarters staff and management within NRR	Group D: State Program Offices, Congress, other Government Agencies (e.g., FEMA)
Group B: Headquarters staff and management outside NRR (e.g., OPA, OCA, NMSS, OSP, RES)	Group E: Industry Related Groups (NEI, INPO, ANS) and individual utilities
Group C: Regional management and staff	Group F: Media
	Group G: Public Interest Groups, local community and community leaders

Each of these stakeholders while relying on the same basic information regarding the process, will require different levels of interaction and information exchange. This transition plan is intended to appropriately address the needs of each of these groups.

Change Management Activities

1. Communications with Key Regional Managers and Supervisors

Regional managers and supervisors play a major role in effecting the change to the new oversight process. To enhance their ability to effectively manage change, the program office must provide adequate informational support and respond in a timely manner to feedback from the regions. The following activities will be used by IIPB to assist regional managers in this capacity:

- a. Weekly conference calls: IIPB will conduct weekly conference calls with regional division level and branch level management to discuss current issues associated with the oversight process. These will continue during the first 6 months of initial implementation at which time the frequency of these calls will be reevaluated. IIPB will ensure that an agenda of the key issues to be discussed during this conference call are promulgated before the call and a summarization of the results of the call are provided by email to this level of regional management. It is expected that regional managers will share appropriate information from this call with their staff and management.
- b. DRP/DRS Counterpart Meetings: On approximately a 6-to-8 week schedule, IIPB will meet with DRP and DRS managers to discuss topics of current interest associated with the RROP. These meetings will generally take place over two days and will allow for consensus building and information sharing on high profile issues. IIPB will develop an agenda in conjunction with regional division directors and will provide a summary of the meeting minutes, highlighting where decisions were agreed to regarding program policy. It is expected that the regional division directors will share appropriate information from this meeting with their staff and management.
- c. Regional/Deputy Regional Administrator Interface: Periodically during the first year of initial implementation, IIPB will conduct, in cooperation with the Director, NRR, interactive forums with the Regional and Deputy Regional Administrators. The purpose of these forums, which may be video conferences as well as face-to-face meetings, will be to discuss key implementation issues of the new oversight process. These forums will be scheduled on an as needed basis, but at a minimum, at least every 3-4 months during initial implementation.
- d. Regional Office Visits: During initial implementation, IIPB will conduct visits to the regions to provide regional management (from BC to RA) the opportunity to discuss RROP status and current issues. It is expected that key IIPB managers and staff will conduct these visits on an informal basis, soliciting regional input on key issues to be discussed before their visit. These visits will be conducted on approximately a quarterly basis, and may be done in conjunction with other activities such as regional counterpart meetings.
- e. Non-Reactor Safety Conference Calls: Within DIPM, the cognizant branches associated with health physics, safeguards, and emergency preparedness

conduct monthly conference calls with their regional counterparts. The purpose of these calls is to share current information and insights regarding the subject areas. These also serve as an opportunity for information associated with related aspects of the RROP to be discussed. An IIPB staff member responsible for oversight of each of these subject matter areas will participate in the calls to share any pertinent information and to capture any applicable feedback.

- f. Ad-Hoc Committees: If issues emerge during initial implementation that require an integrated approach, the staff will form appropriate working groups to assist in addressing the issue. A current example would be the working group to examine the role of cross-cutting issues within the RROP.
- g. Internal Workshops: At the end of the pilot program, an internal lessons learned workshop was conducted which helped the staff focus on key issues and prioritize its efforts to make necessary changes to the process. Such a workshop will be integrated as part of the staff's self-assessment activities, one near the mid-point and another near the end of the first year of initial implementation. This would include representation from all regions and all levels of management.

2. Communication with Regional Staff

Regional staff are the implementers of the RROP, and as such, will be able to provide valuable insights into the workings of the RROP. They also must be kept abreast of any changes pertinent to their role in executing the RROP as well as maintaining an appropriate level of knowledge on the status of the RROP. While the major challenge in achieving this goal lies with regional management, the program office plays a key role in ensuring that appropriate information is made available to regional staff. The following activities will be used by IIPB to assure an appropriate level of communication and feedback is maintained:

- a. Regional Counterpart Meetings: Each region conducts semi-annual inspector counterpart meetings during which time general information is provided to all inspectors on pertinent topic areas. IIPB will work with regional management to assure that it participates in appropriate presentations on RROP issues/status at these counterpart meetings. This provides an excellent opportunity for program office staff to get direct feedback from regional staff.
- b. Senior Resident Inspector/Senior Reactor Analyst Workshops: SRIs and SRAs play pivotal roles in the implementation of the RROP. After some substantive experience is gained with the RROP, the staff will conduct independent workshops with each of these groups to gather specific feedback on the efficacy of the oversight process and to allow for the sharing of information among these individuals in order to enhance consistency. These will occur in the latter half of the first year of initial implementation and SRI workshops may be scheduled coincident with regional counterpart meetings to minimize travel burden on the SRIs.
- c. Feedback Form Process: IIPB will implement a formal feedback process that will enable individual staff members and managers to provide feedback on any

aspect of the RROP. To assure regional management is cognizant of the issues, to provide them the opportunity to respond to issues that have already been addressed by the program office, and to allow for similar concerns to be consolidated, these feedback forms will be screened by regional management (typically branch chiefs) prior to being provided to the program office for consideration. IIPB will maintain an up-to-date file of these feedback forms and will communicate significant issues raised through this process on its internal web page.

- d. Internal Web Page: IIPB has established an internal web page for the RROP that provides pertinent information that is accessible by all staff members. IIPB will continue to use this forum as a means to provide pertinent information in a timely manner. This web page will include an area to discuss resolutions to recently asked policy or process questions such as from the feedback form process described above.
- e. Site Visits: Periodically throughout the initial implementation period, IIPB management and staff will make site visits and communicate directly with inspectors on the efficacy of the RROP and obtain direct face-to-face feedback.

3. Communications with Headquarters Office Staff and Managers:

A number of headquarters offices have a particular role related to the implementation of the RROP. Some offices like RES are involved in developmental activities to support improvements to the RROP, while others are involved in monitoring the impact of plant activities like DLPM. Given the specific, limited role many of these offices play, interactions in many instances will be on a case-by-case basis. The staff has identified specific or periodic interface activities which are discussed below:

- a. Office of Research: RES is actively engaged in activities to support further refinement of the RROP. IIPB will conduct periodic interface meetings to discuss the status of ongoing RES activities and to potentially identify emerging issues. It will be the responsibility of IIPB management to schedule appropriate meetings and define the agenda for these meetings with RES management. IIPB will also ensure that appropriate NRR management is engaged at appropriate stages of process development. Two major activities in which RES is engaged are the development of risk-based performance indicators (RBPIs) and development of an approach to conducting an industry wide assessment. These will be the subject of two forthcoming Commission Papers, the results of which will be integrated as applicable into this transition plan.
- b. Office of Human Resources: HR has been extensively involved in the training activities to support the readiness of the inspection staff to begin initial implementation of the RROP. Initial training of all inspectors will be completed in April 2000, with a shorter training course being conducted for interested NRR personnel in May. IIPB will work closely with HR on two major issues during the first year of initial implementation. These are: revision of Manual Chapter 1245 to revise the inspector training program, including course content to reflect the RROP and development of an approach to enhance risk analyst expertise in the

regions. Separate descriptions of key events and milestones for these two activities will be developed in conjunction with appropriate HR management over the next several months.

- c. Office of Enforcement: IIPB closely interacts with OE on a routine basis. Many enforcement actions will be an outcome of the significance determination process. Therefore, OE has assumed responsibility for coordinating the SDP oversight panel meetings and assuring that once a significance determination is made, appropriate correspondence is developed in a timely manner. IIPB will continue its close interaction with OE and assure that they participate in pertinent counterpart meetings and workshops.
- d. Office of Nuclear Materials Safety and Safeguards: NMSS is currently pursuing development of oversight processes for several of its programs based on the RROP. NRR staff will continue to maintain a working relationship with NMSS to assist them in developing and implementing its new processes.
- e. Office of Public Affairs: OPA plays a definitive role in communicating and interacting with the public and the media. IIPB will coordinate with OPA to ensure that accurate information is made available on reactor oversight process. This will include close coordination on development and issuance of press releases associated with key issues and activities emerging from the RROP and development of informational publications like NUREG 1649, OPA's plain language description of the RROP.
- f. Office of State Programs/Office of Congressional Affairs/FEMA: Each of these organizations are key stakeholders whom the staff needs to be aware of when major changes to the program are made and high profile issues associated with the RROP emerge that impact a particular state. The staff will assure that when such issues emerge, OSP, OCA, and FEMA are informed. The staff will also make themselves available as requested to provide briefings or presentations to interested stakeholders on the RROP, including participation in the annual State Liaison Officers Meeting.
- g. NRR Divisions outside of DIPM: Besides DIPM, whose efforts will be closely coordinated with IIPB activities through routine staff and management interaction, a number of other divisions within NRR either contribute to, or are affected by the RROP in some fashion. For example, the Division of Licensing Project Management maintains a level of cognizance over overall plant status, and needs to be aware of how the oversight process impacts plant and agency activities. The Division of Safety System Analysis provides direct assistance to the RROP through the support of its reactor analysts in assessing risk significance of emerging issues. To facilitate the understanding of these organizations, a variety of activities will be conducted. These will include:
 - Conducting a G-200 training course tailored for HQ personnel;
 - Providing briefings on the oversight process for interested branches;
 - Conducting "all-hands" training for all of NRR;

- Periodically briefing the Expanded Executive Team on the status of the RROP;
 - Periodically publishing articles in NR&C associated with the new process;
 - Soliciting and incorporating feedback from pertinent technical divisions within NRR as part of the annual program self-assessment.
- h. Executive Director for Operations/Commission Office Staffs: Periodically, particularly as key milestones in program implementation occur, the staff is called upon to brief the EDO and Commission staffs. IIPB will continue to provide key documents and information to the OEDO staff which will be forwarded to the Commission if warranted. The staff will also conduct a Technical Assistants Briefing midway through initial implementation to keep the Commission Offices informed of process status. At the culmination of the first year of implementation, the staff will develop a lessons learned Commission Paper and brief the EDO and the Commission on the results of the first year of initial implementation and any recommended process changes. A more definitive outline of this paper and the presentation will be developed in early 2001.

4. Communications with External Stakeholders

External stakeholders have varied levels of interest and involvement in the RROP. IIPB will leverage certain internal organizations, such as OCA, OSP, and OPA to assist in communicating with those specific stakeholders with which they frequently interact. The pilot program incorporated a number of activities in which all of the varied stakeholders were represented, which was valuable in helping achieve a level of consensus. These included the Pilot Plant Evaluation Panel, round table panel discussions, and a public lessons learned workshop. The RROP has been developed in a very open and public environment, and this principle will still be a key element of the ongoing refinement.

- a. Interactions with Nuclear Energy Institute and other Pertinent Industry Groups: The staff will continue to conduct routine, public working level meetings with NEI to discuss the status and ongoing refinements to the RROP. These meetings have traditionally been scheduled about twice a month. As the process stabilizes, it is expected that the frequency of these meetings will lessen. This will occur naturally as the number of issues of mutual interest subsides. The staff will continue to rely on NEI for obtaining and representing industry consensus on special interest items and to facilitate participation of industry in special working groups such as the working group on cross-cutting issues. Additionally, as its schedule permits, IIPB will participate in appropriate industry sponsored meetings to provide information on the status of the RROP.
- b. Individual Licensees: IIPB will leverage the efforts of NEI and the regional offices to communicate issues and seek feedback from licensees. However, program office staff efforts will still be needed to assure that appropriate information is conveyed and that feedback is received and acted upon. Also, several evolutions conducted during the pilot program to solicit consolidated feedback were successful in that regard and will be integrated into the staff's

activities over the next year. Of note, the staff will coordinate the following activities:

- Conduct regional public forums about midway through the first year of initial implementation and again at the end to solicit feedback from utility stakeholders;
 - Establish a formal feedback process by which licensees can submit queries about the oversight process policies;
 - Make periodic site visits and conduct informal meetings with appropriate levels of plant management to obtain direct feedback and share insights on status of the RROP.
 - Participate as requested in senior manager stakeholder meetings periodically scheduled by the Executive Director for Operations.
- c. Public Interest Groups/Local Community Leaders and Public: The staff will continue its efforts to engender feedback and include key public interest groups in ongoing process development activities. This will include solicitation of organizations like the Union of Concerned Scientists, Public Citizen, etc. to participate in public meetings and working groups. Additionally, the staff (i.e., regions) will contact key local public interest groups and local community leaders in the vicinity of plants at which it will conduct public meetings to ensure that they are invited to participate. Each of the regional offices will be conducting public evening meetings over the course of the first 6 months of initial implementation to discuss the new oversight process. IIPB will develop the presentation material so that there is a consistent message delivered at each of these meetings and will also provide subject matter support for the first few presentations.
- d. All External Stakeholders: During the pilot program, the staff conducted several activities that were very successful in communicating with a variety of stakeholders. The staff will continue to pursue these efforts during initial implementation. These will include:
- Maintaining the Web Page up to date, including a current list of common questions and answers and assuring that the Web Page contains pertinent information;
 - Conducting periodic public meetings to collect direct feedback from all interested stakeholders and provide status on the new oversight process;
 - Revise NUREG-1649 (issued by OPA) as needed;
 - Conduct a lessons learned workshop after the end of the first year of initial implementation to provide information on key lessons learned, solicit stakeholder feedback, and discuss potential approaches on addressing key issues.
 - Publish Federal Register Notice for soliciting public feedback on the new oversight process to be considered at the end of the first year of initial implementation.

Organizational Changes

During the pilot program, IIPB formed a specific Transition Task Force to provide direct application of resources to support the dynamic environment associated with the substantial change management activities and developmental work. As initial implementation commences, the Transition Task Force will be subsumed into the IIPB organizational structure as described below. This transition will be effective on April 3, 2000. It should be noted that some of the key roles filled by TTF staff will be retained within IIPB.

1. Section Responsibilities: IIPB consists of two sections which are aligned to support the two major operating plan areas under the branch's cognizance, inspection and assessment. The following describes the key roles filled by each section to support implementation of the new oversight process.

<u>Key Role</u>	<u>Section</u>
Inspection Program	Reactor Inspection Section
Significance Determination Process	Reactor Inspection Section
Inspectable Area Coordinators	Reactor Inspection Section
Operating Plan/Budgeting Interface	Reactor Inspection Section
IT Interface (RITS, RPS, Web Page)	Performance Assessment Section
Performance Indicator Program	Performance Assessment Section
Licensee Performance Assessment	Performance Assessment Section

2. Regional Points of Contact: IIPB will continue to provide a singular contact point with an identified backup for each region to serve as a oversight process coordinator during the course of the first year. This individual will serve as the focal point for the region to facilitate information exchange and to stay abreast of regional activities. This individual will serve as the key staff member to participate in such activities as inspection report review, mid- and end-of-cycle assessments, and regulatory conferences. These individuals will be as follows:

<u>Region</u>	<u>Primary Contact</u>	<u>Backup Contact</u>
I	Timothy Frye	Don Norkin
II	Bob Pascarelli	Sam Malur
III	Roy Mathew	John Thompson
IV	Jim Isom	Tom Foley

3. Subject Matter Points of Contact: Within IIPB, there will be specific points of contact for key technical, program, or policy areas. These individuals will support the regions, generally coordinating their efforts through the regional points of contact. They will be responsible for monitoring oversight process performance in their assigned areas, which may entail site or regional visits, development and implementation of performance metrics, and developing or responding to feedback requests. These points of contact are:

<u>Subject Matter</u>	<u>Point of Contact</u>
External Stakeholder/Industry Interface	Alan Madison
Internal Stakeholder Interface	Tim Frye
Baseline Inspection Program	Steve Stein

Significance Determination Process	Peter Koltay
Supplemental Inspection	Jeff Jacobson
Performance Indicators	Don Hickman
Inspection Reports	Tom Foley
Assessment Process	Tom Boyce
IT Support	Ron Frahm
Risk Analysts/Assessment Issues	Doug Coe
Contract Support	Ed Kleeh
Planning and Budgeting	Armando Masciantonio
Communications	August Spector

4. Inspectable Area Leads: For each inspectable area, IIPB will have an assigned point of contact that will serve a similar role to that described in item 3 above. Note that other organizations within NRR provide direct support in technical areas, such as fire protection, health physics, etc. For these areas, the person identified below will serve more of a coordination role than the subject matter expert. Listed below are the inspectable area leads for the major elements of the inspectable areas. Plant Status is included as it serves as a direct springboard into the use of inspectable areas.

<u>Inspectable Area</u>	<u>Point of Contact</u>
IP 71111*	Sam Malur
IP 71114	Roy Mathew
IP 71121/22	Jim Isom
IP 71130	John Thompson
IP 71151	Serita Sanders
IP 71152	Jeff Jacobson
IP 71153	Don Norkin
Plant Status	Dave Allsopp

* Sam Malur will have overall cognizance of IP 71111. However, he will be assisted by other staff who will have responsibility for several of the attachments to IP 71111.

Key Milestones

The following table lists key events and milestones for IIPB's oversight of initial implementation of the RROP. It does not include the more routine and ongoing activities, but serves to identify key efforts and activities that are pertinent to the first year of implementation of the revised oversight process.

ACTIVITY	PERTINENT MILESTONES	RESPONSIBLE ORGANIZATION(S)
DRP/DRS Counterpart Meetings	Every 6-8 weeks; first one is scheduled for May 16-18	IIPB and Regional Offices
Internal Lessons Learned Workshop	November 2000 May 2001	NRR and Regional Offices
SRI Workshop	Coincident w/Regional Counterpart Meetings	IIPB and Regional Offices
SRA Workshop	October 2000	IIPB, DSSA, RES, and Regions
Development of Risk-Based PIs	To be described in RES generated Commission Paper (due May 2000)	IIPB and RES
Development of approach to Industry-wide Assessment	To be described in RES generated Commission Paper (due June 2000)	IIPB and RES
Revision of Manual Chapter 1245	Milestone schedule to be developed with HR by May 2000	HR, IIPB, and Regions
Develop approach for enhancing regional risk analyst expertise	Develop plan of action with HR and regional management by May 2000	HR, IIPB, and Regions
Revise NUREG 1649	After Commission Paper developed and Commission briefed on initial implementation	OPA and IIPB
Conduct G-200 Training Course for HQ personnel	May 16-18, 2000	HR
Conduct Internal Feedback Process for recommending technical changes	February 2001	NRR/IIPB
Commission TA Briefings	November 2000 May 2001	IIPB
Lessons Learned Commission Paper/Briefing	June 2001	IIPB
Revisit Role of Cross-Cutting Issues	Begin Efforts April 2000; schedule to be developed by working group	Working Group and DIPM; will interact with industry and external stakeholders

ACTIVITY	PERTINENT MILESTONES	RESPONSIBLE ORGANIZATION(S)
Conduct Regional Public Forums	October-December 2000 April - May 2001	IIPB and Regions - co-sponsor with NEI
Local public meetings	April - October 2000	Regional Offices
Public Lessons Learned Workshop	May 2001	IIPB
Federal Register Notice published	June 2000- April 2001	IIPB