

Reactor Oversight Process Communication and Training Activities

Scope and Objectives—The staff of the U.S. Nuclear Regulatory Commission (NRC) continued to focus on stakeholder involvement and open communication with the Reactor Oversight Process (ROP) in calendar year (CY) 2005. The staff used a variety of communication vehicles to ensure that all stakeholders have access to ROP information and results and have an opportunity to participate in the process and provide feedback. The monthly public meetings with external stakeholders, the internal feedback process, and biweekly telephone conferences and frequent meetings with internal stakeholders provided valuable insights for program improvements. The staff conducted the annual survey of external stakeholders in CY 2005 to actively solicit and analyze stakeholder feedback regarding the effectiveness of the ROP. The staff also continued its efforts to improve the inspector training programs and techniques in CY 2005, continued to maintain the ROP Web pages, and implemented several initiatives to further improve inspector efficiency. The following discusses several highlights from this past year.

Internal Stakeholder Interface—The Office of Nuclear Reactor Regulation (NRR) staff continued to conduct biweekly conference calls with regional division- and branch-level management to discuss current issues associated with the ROP. In addition, NRR staff met periodically with regional managers to discuss more complex ROP topics and issues. NRR staff also participated in each regions' resident counterparts meeting and made site visits to give regional staff and management the opportunity to discuss ROP implementation and provide feedback.

The internal feedback process, as described in Inspection Manual Chapter (IMC) 0801, "Reactor Oversight Process Feedback Program," also provides a useful means for the NRC staff to identify concerns or issues and recommend improvements related to ROP policies, procedures, or guidance. Timeliness in resolving feedback issues has steadily improved over the past few years and remains a focus for NRR staff. Based on discussions with regional feedback coordinators, the regional staff expressed general satisfaction with the feedback process response time and quality of feedback resolutions. The staff implemented enhancements to the feedback process in CY 2005 by providing users with the ability to easily view open and closed feedback forms on the internal Web page. Further potential improvements include electronic submission of feedback forms and a database search capability.

External Stakeholder Interface—The staff conducted monthly public working-level meetings with the Nuclear Energy Institute (NEI), the industry, and other stakeholders to discuss the status of ongoing refinements to the ROP. In particular, the staff made significant progress in addressing issues with Mitigating Systems Performance Index (MSPI) implementation and improving the frequently asked question process. Several public meetings were also held to discuss the staff's progress in enhancing the ROP to more adequately address safety culture. The staff also conducted public meetings in the vicinity of each operating reactor to discuss the results of the NRC's annual assessment of the licensee's performance. These meetings provided an opportunity to engage interested stakeholders on the performance of the plant and the role of the agency in ensuring safe plant operations. The staff also sponsored three breakout sessions at the Regulatory Information Conference (RIC) in March 2005 on the topics of cross-cutting issues, performance indicators, and the ROP in general. Participants

discussed additional ROP topics at the 2006 RIC in March 2006, including the inspection program, the assessment program, and safety culture. The RIC sessions and public meetings have resulted in valuable feedback for the staff. As directed by the Commission, the staff continued to emphasize the importance of the effective implementation of a good corrective action program while participating in conferences, workshops, and meetings with licensees, such as the Corrective Action Program Owners Group meetings. The NRC monitors compliance with this fundamental premise of the ROP via Inspection Procedure (IP) 71152, "Identification and Resolution of Problems," and considers this action closed.

Stakeholder Survey Results—Consistent with the guidelines prescribed by IMC 0307, "Reactor Oversight Process Self-Assessment Program," the staff conducted an external survey during this self-assessment cycle to solicit and analyze stakeholder feedback regarding the effectiveness of the ROP. In accordance with the IMC, the NRC conducts the internal survey every other year; therefore, it was not conducted during this ROP cycle. However, as discussed further in the section on inspector training below, the staff administered an internal survey specifically focused on training effectiveness. The staff plans to conduct the biennial internal survey in CY 2006 and will incorporate relevant questions regarding inspector training.

The following provides a general analysis of the stakeholder responses to the external survey. The annual ROP performance metric report, available through the Agencywide Documents Access and Management System (ADAMS), and the applicable performance area discussions in Enclosures 1 through 4 to this paper provide a more detailed analysis (reference ADAMS Accession No. ML060590135).

The staff published a survey in a *Federal Register* notice on October 21, 2005, to obtain external stakeholder input regarding the effectiveness of the ROP. In addition, the staff (1) mailed approximately 700 surveys directly to stakeholders, (2) placed a direct link to the survey information on the ROP Web page, and (3) issued a press release and posted it on the NRC's external Web site. The survey requested responses to 19 specific questions corresponding to specific ROP performance metrics as defined in IMC 0307.

The survey used this year was very similar to that used in previous years. The survey continued to use multiple-choice answers and made only minor changes to a few questions. In addition, as in the past year, the survey asked participants to elaborate on their multiple-choice ratings with specific thoughts or concerns and to offer their opinions on possible improvements.

The NRC received 21 responses to the external survey. This number of responses is comparable to the 21 received in 2004 and the 18 received in 2003 from individuals and/or organizations. As in previous years, the NRC received responses from three distinct categories of external stakeholders—members of the public or public interest groups (seven responses), state or local agencies (four responses), and the industry or industry organizations (nine responses). One anonymous respondent also provided feedback. The following lists responses in the order received and includes the ADAMS accession number for the comments in parentheses after the respondent's name:

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| (1) | AMEC Earth & Environmental, Inc. | (ML052990251) |
| (2) | Senior Nuclear Industry Consultant | (ML053040030) |
| (3) | Pannell Consulting | (ML053040032) |

(4)	T. Gurdziel	(ML053040034 & ML053040036)
(5)	Georgia Environmental Protection Division	(ML053040070)
(6)	Nuclear Management Company	(ML053040072)
(7)	Exelon, Kennett Square, PA	(ML053040062)
(8)	First Selectman of Connecticut	(ML053220250)
(9)	Alabama Emergency Management Agency	(ML053360410)
(10)	Greenpeace	(ML053360474)
(11)	Region IV Utility Group	(ML053430120)
(12)	Nuclear Management Company, LLC	(ML053430121)
(13)	Exelon, Byron Station	(ML053190067)
(14)	Union of Concerned Scientists	(ML053430122)
(15)	Nuclear Energy Institute	(ML053430124)
(16)	Anonymous	(ML053430123)
(17)	Strategic Teaming and Resource Sharing	(ML053430125)
(18)	AmerGen & Exelon	(ML053500119)
(19)	Region 5/6 Emergency Management	(ML053630061)
(20)	Southern California Edison	(ML053640300)
(21)	TMI Alert/EFMR Monitoring	(ML060250245)

Overall respondent satisfaction showed no dramatic improvements or declines between the initial and current ROP implementation. Most respondents provided grades to the multiple-choice questions, and many provided comments on the grades. The survey responses were generally consistent with many comments from previous years, as were the number and distribution of the responses.

In past years, the staff had received feedback indicating that it was unresponsive to survey comments. To address this concern, the staff consolidated the comments by question and provided a comprehensive response to each question in the CY 2004 survey (reference ADAMS Accession No. ML052090158). The staff received positive feedback on the consolidated response from several stakeholders in this year's survey. As in previous years, the staff will acknowledge receipt of each survey response by correspondence indicating that the staff has considered and generally addressed the comments in this paper, as appropriate. In addition, the staff will post this paper, the annual ROP performance metric report, and a consolidated response to the CY 2005 external survey to the ROP Web page and will send them, as well as an acknowledgment letter, to each survey respondent.

In order to gain further efficiencies, and because the comments and staff analysis have tended to repeat the same themes from year to year, the staff is considering a change in the frequency of the external survey to every other year, consistent with the internal survey. As such, one year's ROP performance metrics and self-assessment would include survey inputs and analysis from internal stakeholders, and the following year would include external survey inputs and analysis. Regardless, internal and external feedback will be considered each year based on continuous feedback during meetings, the feedback process, and other venues as described above. The staff plans to solicit feedback from external stakeholders before implementing this proposed change in survey frequency.

Inspector Training—The staff continued its efforts to improve the initial and continuing inspector training programs as described in IMC 1245, "Qualification Program for the Office of Nuclear Reactor Regulation (NRR) Programs." The primary goal of IMC 1245 is to produce and

maintain well-qualified, competent inspectors. During CY 2005, the IMC 1245 working group developed and distributed the first survey on inspector training effectiveness, in part to address a recommendation from the Effectiveness Review of Lessons Learned Task Force report of August 2004 (reference ADAMS Accession No. ML042110287). The biennial internal ROP survey will incorporate the inspector training effectiveness survey. The staff intends the survey to improve the initial and continuing training of inspectors by gathering input from (1) new inspectors on the quality and appropriateness of the inspector training program, (2) managers of qualifying inspectors on the new inspector training, and (3) experienced inspectors on the continuous training provided and the refresher training required by IMC 1245. The IMC 1245 working group will review the results of the inspector training effectiveness survey and will consider and implement, as appropriate, recommendations and insights gained from the survey.

The responses to the 2005 inspector training effectiveness survey highlighted the role regional managers have in creating and maintaining an environment that encourages inspectors to identify issues and improve the inspection program. Of the 143 inspector respondents, 70 percent indicated that their management was very receptive to discussing issues that did not immediately fit into one of the ROP IPs. In addition, comments provided in response to the question, "How does NRC management encourage a questioning attitude," indicated three actions that are instrumental in creating an environment that encourages inspectors to maintain a questioning attitude. These include (1) branch chief engagement through listening to inspectors and asking questions, (2) recognition through awards, performance appraisals, and value-added findings, and (3) discussions of value-added findings during daily branch meetings and inspector counterpart meetings.

In CY 2005, the staff developed and distributed Web-based training courses to inform inspectors about new and revised program documents, including IMCs 0609, "Significance Determination Process," and 0612, "Power Reactor Inspection Reports." The staff also conducted Web-based annual ROP refresher training that focused on substantive cross-cutting issues. The Web-based training courses remain available on the training Web page to be used by new inspectors as part of the initial inspector qualification process and by qualified inspectors as an inspection resource.

The IMC 1245 management steering group and working group annually review the effectiveness of inspector training through feedback forms, results of the inspector oral boards, and regional experience. The groups recommend improvements and revisions and implement them as appropriate. For example, in response to the audit by the Office of the Inspector General (OIG) of the baseline inspection program, Appendix A, "Reactor Operations Inspector Technical Proficiency Training and Qualification Journal," to IMC 1245 was revised to include a postqualification requirement for the reactor operations inspector (resident inspector) to receive vendor-specific training for the assigned facility.

ROP Web Pages—The staff effectively used the ROP Web pages to communicate accurate and timely ROP information to all stakeholders. The staff revised IMC 0306, "Information Technology Support for the Reactor Oversight Process," in 2005 to (1) incorporate recommendations from a recent OIG audit of the Reactor Program System, (2) clarify the uses

and definitions of several terms to ensure consistent application, (3) clarify the process for initiating and updating inspection finding information in the Reactor Program System, and (4) relocate several of the detailed attachments and tables to the internal ROP Web page for easier revision and maintenance.

The staff successfully used the external ROP Web page to post plant assessment results and to disseminate useful information to the public as needed. The internal ROP Web page, known as “ROP Digital City,” continued to serve as a hub for inspectors to the various types of available information, including read-and-sign training, the inspector newsletter, reactor operating experience, and draft guidance. Some stakeholders have complained about the difficulty in navigating through the NRC external Web site to find the relevant ROP information. However, the performance metrics and positive feedback from both external and internal stakeholders indicate that the ROP Web pages themselves are useful, accurate, and timely. The staff will consider any specific recommendations to further improve the presentation and organization of the ROP-related information on the Web.

Initiatives to Improve Inspector Efficiency—Led by Region IV, the staff issued NUREG/BR-0326, “NRC Inspector Field Observation Best Practice,” as a pocket reference guide in November 2005 to serve as a knowledge management tool in response to an initiative by the NRC Executive Director for Operations. Inspectors developed the booklet to combine the best practices of all four regions. The booklet consists of two parts—guidance on plant inspections and useful inspection tips. The NRC distributed the booklet to all inspectors and posted it on the ROP Digital City Web site.

The NRC implemented the Inspector Community Forum, an electronic Web-based knowledge management tool, in late March 2005 as an information resource for inspection preparation and to broaden inspector communication networks. The Inspector Community Forum enhances the depth and efficiency of inspection preparation by storing current IPs, related generic communications, and other useful inspection-related information. The Inspector Community Forum also functions as a messaging board to facilitate communications between inspectors. At the end of CY 2005, the forum had 109 registered users and 86 posted messages. The program office monitors forum use and looks for ways to incorporate insights gained from the operating experience program.

The inspector newsletter continues to receive positive feedback from inspectors and management. The NRC issues the electronic newsletter bimonthly and posts it on the internal ROP Web page. The staff did not conduct any information technology pilot studies this year. However, the staff will explore additional technologies and pilot programs to further improve inspector efficiency and effectiveness as needs are identified.