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J. Lion (512)

2011 Reactor Oversight Process External Survey

Thank you for participating in the survey. Your feedback is important to us and will be used in the ROP self-assessment program to evaluate the effectiveness of the ROP. There are 20 items in the survey and places for written comments. We seek constructive feedback to improve the program, and your comments with **specific examples** are welcomed. If you are filling out a hard copy, please use additional sheets for comments if needed.

Because your comments will not be edited to remove any identifying or contact information, the NRC cautions you against including any information in your submission that you do not want to be publicly disclosed.

The survey ends on January 13, 2012.

Instruction: For each of the statements, please indicate if it's **reasonably** true. If you don't have enough knowledge/experience, please select U/A (unable to answer). You need to enable ActiveX control to fill the survey.

1. The performance indicator (PI) program provides useful insights, particularly when combined with the inspection program, to help ensure plant safety and/or security.

Yes

No

U/A

Can you recommend any improvements?

The answer to this is both "Yes" and "No". NRC Staff have found that that the Performance Indicator program does not provide meaningful insight into plant performance and does not predict declining performance. We think that is partially true. The mitigating systems PIs appear to anticipate problems. However, the remaining indicators do not sufficiently discriminate given today's high level of safety performance. They are too lagging and too old. They should be modified or replaced.

2. Appropriate overlap exists between the PI and the inspection programs to provide for a comprehensive indication of licensee performance.

Yes

No

U/A

Can you recommend any improvements?

Data to support a conclusion about this are lacking. Too many plants get "Greater than Green" findings year after year, just as Davis Besse did before the event there. At least there have not been any equivalent events since so presumably the strength of the combined PI+Inspections procedure is working better than in the past.

3. NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," provides clear guidance regarding performance indicators.

Yes

No

U/A

Can you recommend any improvements?

There continues to be problems in figuring out how to integrate safety culture measurements with the ROP. We could find little evidence that NRC is strongly engaged in collecting data and assessing patterns in plant problems

when it comes to safety culture.

4. PI program effectively contributes to the identification of performance outliers based on risk-informed, objective, and predictable indicators.

Yes No U/A

Can you recommend any improvements?

I am not sure how to answer this question. See comments to question 1. On the one hand the ROP seems to working. On the other hand, other than the Mitigating Systems PIs, it is not clear to which the other PIs effectively discriminate at today's high level of safety performance. Most seem to be too lagging, and the NRC has acknowledged the need to find more "leading" indicators that detect potential problems early. Given that some indicators have never resulted in a finding other than green, they are probably not very useful. The failure to create safety culture PIs is glaring given that NRC itself recognizes that safety culture is a critical risk component.

5. Information contained in inspection reports is relevant, useful, and written in plain English.

Yes No U/A

Can you recommend any improvements?

We found it very hard to obtain all inspection reports. The only way to review safety culture findings for instance is to go to each site assessment letter. The NRC can do a better job of providing a simple, searchable relational data base of the findings that could provide more summary data.

6. The inspection program adequately covers areas that are important to plant safety and/or security and is effective in identifying and ensuring the prompt correction of performance deficiencies.

Yes No U/A

Can you recommend any improvements?

As noted above, it is very hard to document how safety culture assessments are carried out. Safety culture should be examined as part of the Quality Assurance Program requirement.

7. The Significance Determination Process (SDP) results in an appropriate regulatory response to performance issues.

Yes No U/A

Can you recommend any improvements?

The NRC acknowledges that problems in safety culture are the root cause of declines in plant performance. If that is the case, identified problems in safety culture should be put into the *Significant Determination Process*.

8. The NRC takes appropriate actions to address performance issues for those plants outside the Licensee Response Column of the Action Matrix.

Yes No U/A

Can you recommend any improvements?

9. Information contained in assessment reports is relevant, useful, and written in plain English.

Yes No U/A

Can you recommend any improvements?

Please see comments to question 5

10. The ROP safety culture enhancements help in identifying licensee safety culture weaknesses and focusing licensee and the NRC attention appropriately.

Yes No U/A

Can you recommend any improvements?

It is difficult to answer this question given the way it is asked. What do you mean by "help?" Safety culture should be fully incorporated into the ROP by making it a 4th Strategic Area. We think the ROP ought to look like this:

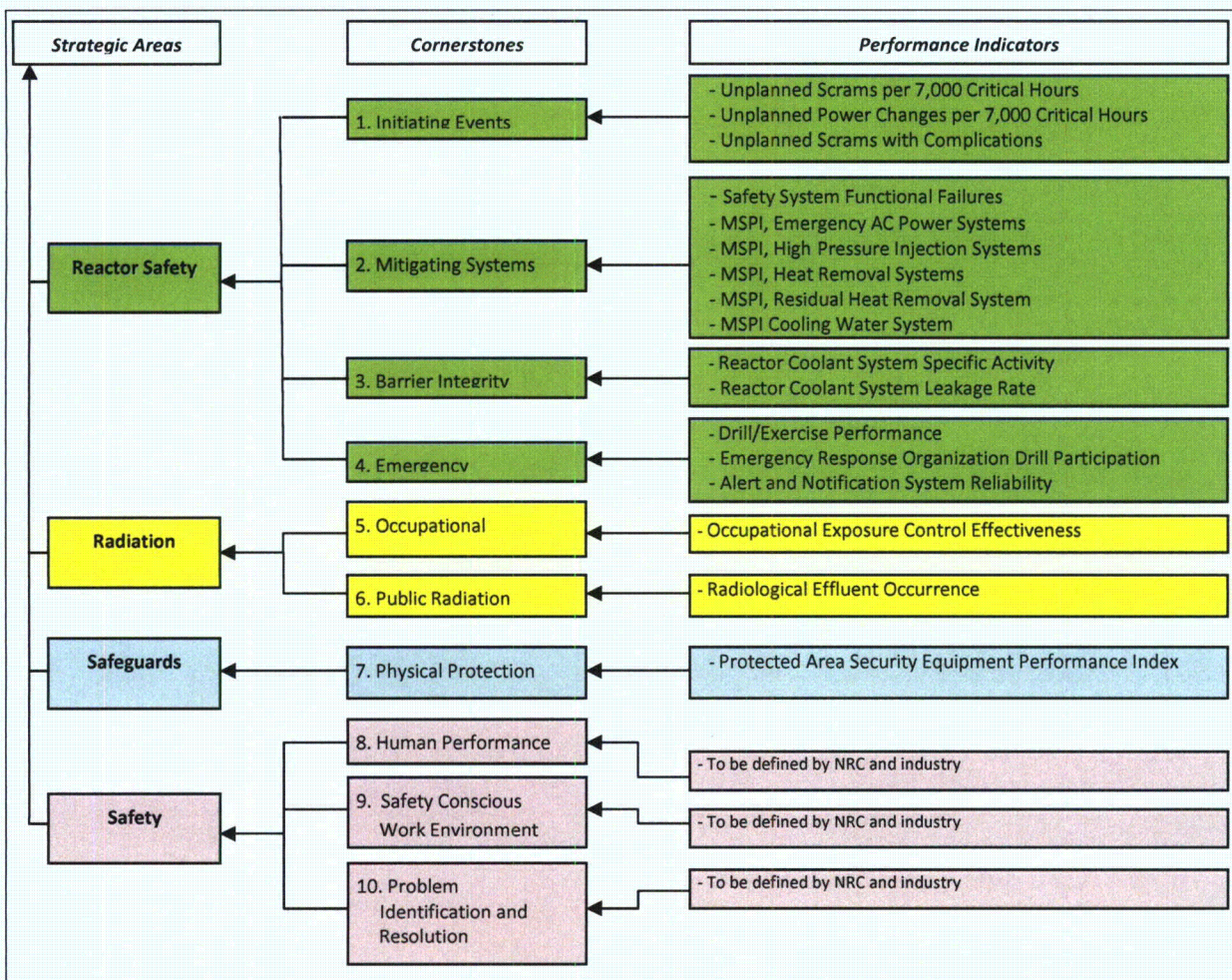


Fig 10.4: Proposed ROP Flowchart

11. ROP oversight activities are predictable (i.e., controlled by the process) and reasonably objective (i.e., based on supported facts, rather than relying on subjective judgment).

Yes No U/A

Can you recommend any improvements?

We could not find adequate evidence to support this finding, and because safety culture has not been truly integrated into the ROP it is hard to see how this could be a true statement given that the NRC acknowledges safety culture as a leading risk.

12. The ROP is risk-informed, in that actions and outcomes are appropriately graduated on the basis of increased significance.

Yes No U/A

Can you recommend any improvements?

We could not find adequate evidence to support this finding, and because safety culture has not been truly integrated into the ROP it is hard to see how this could be a true statement given that the NRC acknowledges safety culture as a leading risk.

13. The ROP is understandable and the processes, procedures, and products are clear and written in plain English.

Yes No U/A

Can you recommend any improvements?

14. The ROP provides adequate assurance, when combined with other NRC regulatory processes, that plants are operated and maintained safely and securely.

Yes No U/A

Can you recommend any improvements?

On the one hand the ROP seems to working. On the other hand, other than the Mitigating Systems PIs, it is not clear to which the other PIs effectively discriminate at today's high level of safety performance. Most seem to be too lagging, and the NRC has acknowledged the need to find more "leading" indicators that detect potential problems early. Given that some indicators have never resulted in a finding other than green, they are probably not very useful. The failure to create safety culture PIs is glaring given that NRC itself recognizes that safety culture is a critical risk component.

15. NRC actions related to the ROP are high quality, efficient, realistic, and timely.

Yes No U/A

Can you recommend any improvements?

It takes way too long to post annual assessment letters in publicly available data bases.

16. The ROP ensures openness in the regulatory process.

Yes

No

U/A

Can you recommend any improvements?

17. There are sufficient opportunities for the public to participate in the process.

Yes

No

U/A

Can you recommend any improvements?

NRC provides a great deal of opportunity for public participation. However, given the complexity of the issues involved, to have truly informed public participation, NRC should consider funding public advocates for their time and to enable them to get access to the technical expertise they need to be truly effective advocates.

18. NRC is responsive to public's comments and inputs on the ROP.

Yes

No

U/A

Can you recommend any improvements?

19. The ROP has been implemented as defined by program documents.

Yes

No

U/A

Can you recommend any improvements?

20. The ROP does NOT result in unintended consequences.

Yes

No

U/A

Can you recommend any improvements?

Please define what is meant by "unintended" consequences.

Which of the following groups best describe your affiliation/interest?

State/Local Government

Public (interested member of the public or public interest groups)

Industry (licensee and its employees, INPO, NEI, etc)

Other: Safety & health consultant/researcher

Please save and email the survey to ROPSurvey@nrc.gov, or mail a hard copy (with docket ID NRC-2011-0270) to:

Cindy Bladey,
Chief, Rules, Announcements, and Directives Branch Office of Administration (Mail Stop: TWB-05-B01M)
U.S. Nuclear Regulatory Commission
Washington, DC 20555_0001

If you submit this by email, you will receive an acknowledge email. If you do not receive such email in two business days, please contact us at ROPSurvey@nrc.gov. Please save a copy of the filled survey for your record.

Paperwork Reduction Act This survey contains information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). These information collections were approved by the Office of Management and Budget, approval number 3150-0197, which expires August 31, 2012.

The burden to the public for these voluntary information collections is estimated to be 45 minutes per response. The information gathered will be used in the NRC's self-assessment of the reactor oversight process. Send comments regarding this burden estimate to the Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet electronic mail to INFOCOLLECTS.RESOURCE@NRC.GOV; and to the Desk Officer, Chad Whiteman, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0197), Office of Management and Budget, Washington, DC 20503.

Public Protection Notification The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.