

## APPENDIX A

### CONSTRUCTION REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT METRICS

#### I. INSPECTION PROGRAM METRICS

##### **IP-1 Inspection Results timeliness**

**Definition:** Audit 100% of issued inspection reports in relation to the inspection program timeliness requirements (IMC 0613, "Documenting 10 CFR Part 52 Construction Inspections").

**Criteria:** Expect 90% of inspection report timelines requirements met.

**Lead:** NRO/DCIP (CAEB)

**Goals Supported:** Objective, Risk-Informed, Predictable, Effective, Open

**NOTE:** For inspections not conducted by a resident inspector, inspection completion is normally defined as the day of the final exit meeting. For resident inspector and integrated inspection reports, inspection completion is normally defined as the last day covered by the inspection report.

##### **IP-2 NRC's Response to Technical Assistance Request (TAR) Is Timely and Effective**

**Definition:** Audit 100% of TARs completed in the assessment year to ensure that timely assistance was provided to the inspection program.

**Criteria:** Expect 90 % of TARs to be closed within program timeliness goals outlined in NRO Office Instruction NRO-COM-108.

**Lead:** NRO/DCIP (CIPB, CAEB)

**Goals Supported:** Objective, Risk-Informed, Understandable, Open, Effective

#### II. SIGNIFICANCE DETERMINATION PROCESS METRICS

##### **SDP-1 SDP Results Are Predictable and Repeatable and Focus Stakeholder Attention on Significant Construction Safety Issues**

**Definition:** Annually, audit a representative sample (up to four) of inspection findings against the standard criteria set forth in IMC 2519, "Construction Significance Determination Process," and its appendices. To the extent available, samples should include potentially greater-than-green findings that were presented to the Significance Determination Process/Enforcement Review Panel (SERP).

Findings should contain adequate detail to enable an independent auditor to trace through the available documentation and reach the same significance color characterization. Any SDP outcomes determined to be non-conservative will be evaluated and appropriate programmatic changes will be implemented.

**Criteria:** The target goal is that at least 90% are determined to be predictable and repeatable.

**Lead:** NRO/DCIP (CAEB)

**Goals Supported:** Risk-Informed, Predictable

**SDP-2** **SDP Results in an Appropriate Regulatory Response to Performance Issues, Outcomes Are Risk-Informed and Accepted by Stakeholders**

**Definition:** Track the total number of appeals of final SDP results.

**Criteria:** Expect zero appeals of SDP significance that result in a final determination being overturned. All successful appeals will be assessed to determine causal factors and to recommend process improvements.

**Lead:** Regions, NRO/DCIP (CAEB)

**Goals Supported:** Risk-Informed, Objective, Predictable, Understandable, Open

### III. ASSESSMENT PROGRAM METRICS

**AS-1** **Actions Are Determined by Quantifiable Assessment Inputs (i.e., SDP Results) and are Commensurate with the Risk of the Issue and Overall Quality of Construction**

**Definition:** Audit all assessment-related letters and count the number of deviations from the Construction Action Matrix. Evaluate the causes for these deviations and identify changes to the cROP, if any, to improve the guidance documents.

**Criteria:** Expect zero deviations.

**Lead:** NRO/DCIP (CAEB)

**Goals Supported:** Objective, Risk-Informed, Open

**AS-2** **Assessment Program Results (Assessment Reviews, Assessment Letters and Public Meetings) Are Completed in a Timely Manner**

**Definition:** Track the number of instances in which the timeliness goals stipulated in IMC 2505, "Periodic Assessment of Construction Inspection Program Results," were not met for: (1) the conduct of quarterly, mid-cycle, and end-of-cycle reviews; (2) the issuance of assessment letters; and (3) the conduct of public meetings.

**Criteria:** Expect 90% timeliness goals for the assessment process to be met.

**Lead:** Region, NRO/DCIP (CAEB)

**Goals Supported:** Effective, Open, Predictable

**AS-3 NRC's Response to Performance Issues Is Timely**

**Definition:** Count the number of instances where a finding was held open for more than six months due to the need to complete the supplemental inspection.

**Criteria:** Expect there to be no instances where a supplemental inspection has not been completed within six months for which the licensee had indicated they were prepared for the inspection.

**Lead:** Region, NRO/DCIP (CAEB)

**Goals Supported:** Effective, Predictable

**AS-4 Degradations in Quality of Construction are Gradual and Allow Adequate Agency Engagement of the Licensees**

**Definition:** Track the number of instances each quarter in which construction sites move more than one column to the right in the Construction Action Matrix (as indicated on the Construction Action Matrix Summary).

**Criteria:** Expect no instances in which performance issues causes a construction site to move more than one column to the right in the Construction Action Matrix.

**Lead:** NRO/DCIP (CAEB)

**Goals Supported:** Risk-Informed, Predictable

**IV. ITAAC METRICS**

**ITA-1 Analysis of ITAAC Family Inspection Completion**

**Definition:** Audit inspections completed for each family to ensure high level procedure steps have been completed to ensure proper closure of an ITAAC family.

**Criteria:** Expect 100% of the high level steps completed.

**Lead:** NRO/DCIP (CITB, CIPB)

**Goals Supported:** Effective, Predictable

**ITA-2            Analysis of ITAAC Closure Letter Effectiveness**

**Definition:**     Annually, review a sample of ITAAC Closure letters to determine the program’s effectiveness and contribution to the overall effectiveness of the inspection program. The objectives of the review are: (1) to determine if ITAAC closure letters reviewed are being completed in a timely manner, (2) to determine if effective communication is being achieved during the process between NRC, Licensees, and the Public (3) to ensure ITAAC closure letters reviews are completed properly and effectively. The focus of this effort is to adjust the closure process and existing resources to improve the effectiveness of the ITAAC Closure program in identifying significant deficiencies.

**Criteria:**        Expect no ITAAC closure letters to be reopened because of a deficiency in the process that was within the NRC’s ability to identify before closure verification. Summarize and evaluate the ITAAC closure letter reviews and propose program adjustments as necessary to address noted inefficiencies.

**Lead:**            NRO/DCIP (CITB)

**Goals Supported:**    Effective, Risk-Informed

V.                OVERALL cROP METRICS

**O-1                Analysis of NRC’s Responses to Significant Events**

**Definition:**     Review reports from incident investigation teams (IITs) and augmented inspection teams (AITs) to collect lessons learned regarding cROP programmatic deficiencies (i.e., did the baseline inspection program inspect this area? did the SDP accurately characterize resultant findings?). IITs already have the provision to determine NRC program deficiencies. AITs will be reviewed by NRO/DCIP (CAEB) to identify any weaknesses.

**Criteria:**        Expect no major programmatic voids.

**Lead:**            NRO/DCIP (CAEB)

**Goals Supported:**    Effective, Predictable

END

Attachment 1: Revision History Table

Attachment 1 - Revision History for IMC 2522 Appendix A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML12289A041 11/30/2012 CN 12-027	This is the initial issuance of this Inspection Manual Chapter. Completed a four year search for commitments and found none.	N/A	ML12289A040