

AFFIRMATION ITEM

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: CHAIRMAN SVINICKI

SUBJECT: COMSECY-16-0022: PROPOSED CRITERIA FOR
REACTOR OVERSIGHT PROCESS CHANGES
REQUIRING COMMISSION APPROVAL AND
NOTIFICATION

Approved XX Disapproved Abstain Not Participating

Comments: Below Attached XX None



SIGNATURE

04/ 11 /17

DATE

Entered on "STARS" Yes No

**Chairman Svinicki's Comments on COMSECY-16-0022
Proposed Criteria for Reactor Oversight Process Changes Requiring Commission
Approval and Notification**

I approve the staff's proposed criteria for Reactor Oversight Process changes, subject to the revisions identified below.

The staff should present the following ROP changes to the Commission for approval prior to implementation.

1. Changes to fundamental elements of the ROP framework (e.g., ~~significance determination processes~~, cornerstones, cross-cutting areas, assessment inputs);
2. ~~Addition, deletion, or significant modification to adding or deleting~~ oversight processes ~~in their entirety~~ (e.g., cross-cutting issues (CCI) process, supplemental inspections);
3. ~~C~~hanges to ROP thresholds, ~~including but not limited to (e.g.,~~ significance determination process (SDP) thresholds, ~~and~~ performance indicator (PI) thresholds);
4. ~~C~~hanges to the number of inputs needed to make column changes in the Action Matrix;
5. ~~Addition, deletion or significant revision of adding or deleting~~ PIs;
6. ~~S~~pecific ROP-related safety culture activities beyond communication and education; ~~and~~
- ~~6-7.~~ Temporary Instructions requiring 80 hours or more of direct inspection effort;
8. ~~Initiation of any pilot projects involving the items above; and~~
- ~~7-9.~~ Items specifically identified by the Commission.

The staff should notify the Commission of the following ROP changes prior to implementation using an appropriate method based on the urgency and complexity of the change, such as an informational Commission paper, a Note to Commissioners' Assistants, or a briefing of Commission staff.

1. Significant changes¹ to the implementation of existing ROP programs (e.g., baseline and supplemental inspection procedures, implementation of the CCI process, implementation of SDPs, implementation of the assessment program);
2. ~~C~~hanges to definitions affecting the Action Matrix other than threshold changes;
3. ~~Addition, deletion, or nonsignificant revisions to adding or deleting~~ baseline inspections; ~~and~~
- ~~3-4.~~ Temporary Instructions requiring less than 80 hours of direct inspection effort.
- ~~4.~~ ~~pilot program plans and results that involve licensee participation.~~

Staff may notify the Commission of other ROP changes of lesser significance (e.g., more routine changes to baseline inspection procedures) after implementation using an appropriate method.



Kristine L. Svinicki

04/ 11 /17

¹ For the purpose of this criterion, changes involving notable differences in the level of industry or NRC effort, garnering extensive stakeholder feedback, or impacting the publicly available outputs of the ROP should be considered "significant changes."

AFFIRMATION ITEM
RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Baran

SUBJECT: COMSECY-16-0022: PROPOSED CRITERIA FOR
REACTOR OVERSIGHT PROCESS CHANGES
REQUIRING COMMISSION APPROVAL AND
NOTIFICATION

Approved X Disapproved ___ Abstain ___ Not Participating ___

Comments: Below ___ Attached X None ___

Entered in STARS

Yes X

No _____



SIGNATURE

12/13/16

DATE

**Commissioner Baran's Comments on COMSECY-16-0022,
"Proposed Criteria for Reactor Oversight Process
Changes Requiring Commission Approval and Notification"**

I appreciate the staff's thoughtful effort to identify the Reactor Oversight Process (ROP) changes that should require Commission approval and those that should be submitted for information only. I approve the staff's proposed criteria subject to the edits below. My edits generally increase the number of ROP changes that would require Commission approval because many such changes would alter how NRC oversees the safety performance of the entire fleet of operating power reactors in the United States. I also think it is important for the Commission to approve the initiation of the piloting of major ROP changes.

Reactor Oversight Process (ROP) Changes Requiring Commission Approval Prior To Implementation

1. Substantive ~~C~~changes to fundamental elements of the ROP framework (e.g., cornerstones, cross-cutting areas, assessment inputs);
2. Addition, ~~ng~~ or deletion, ~~ng~~ or significant revision of oversight processes ~~in their entirety~~ (e.g., cross-cutting issues (CCI) process, significance determination processes (SDP) supplemental inspections);
3. Changes to ROP thresholds, including (e.g., ~~significance determination process (SDP) thresholds, performance indicator (PI) thresholds,~~) and the number of quarters SDP or PI inputs are counted in the ROP;
4. Substantive changes to the ~~number of inputs needed to make column changes in the~~ Reactor Oversight Process Action Matrix;
5. Addition, ~~ng~~ or deletion, ~~ng~~ or significant revision of PIs;
6. Specific ROP-related safety culture activities beyond communication and education;
- ~~6-7.~~ Initiation of any pilot projects involving the items above; and
- ~~7-8.~~ Items specifically identified by the Commission.

ROP Changes Which Staff Would Inform the Commission

1. Significant changes¹ to the implementation of existing ROP programs (e.g., baseline and supplemental inspection procedures, implementation of the CCI process, implementation of SDPs, implementation of the assessment program);
- ~~2.~~ Changes to definitions affecting the Action Matrix other than threshold changes;
- ~~3-2.~~ Addition, ~~ng~~ or deletion, ~~ng~~ or significant revision toof baseline inspections; and
- ~~4-3.~~ Pilot program plans and results that involve licensee participation. Significant changes in the level or type of communication with the public as part of the ROP.

¹ For the purpose of this criterion, changes involving notable differences in the level of industry or NRC effort, garnering extensive stakeholder feedback, or impacting the publicly available outputs of the ROP should be considered "significant changes."

AFFIRMATION ITEM
RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Commissioner Burns
SUBJECT: COMSECY-16-0022: PROPOSED CRITERIA FOR
REACTOR OVERSIGHT PROCESS CHANGES
REQUIRING COMMISSION APPROVAL AND
NOTIFICATION

Approved XX Disapproved ___ Abstain ___ Not Participating ___

Comments: Below ___ Attached XX None ___

Entered in STARS

Yes x

No _____



SIGNATURE

30 March 2017

DATE

Commissioner Burns's Comments on COMSECY-16-0022
Proposed Criteria for ROP Changes Requiring Commission Approval and Notification


I approve the staff's proposed criteria for reactor oversight process changes requiring Commission approval or notification, subject to the edits identified below. For changes that meet the notification criteria, staff should provide the Commission notification no later than 14 days prior to the effective date of the change or commencement of the pilot program.

The staff should present the following ROP changes to the Commission for approval prior to implementation.

1. Changes to fundamental elements of the ROP framework (e.g., cornerstones, cross-cutting areas, assessment inputs);
2. ~~adding or deleting~~ addition or deletion of oversight processes in their entirety (e.g., cross-cutting issues (CCI) process, supplemental inspections);
3. changes to ROP thresholds (e.g., significance determination process (SDP) thresholds, performance indicator (PI) thresholds);
4. changes to the number of inputs needed to make column changes in the Action Matrix;
5. ~~adding or deleting~~ addition, deletion, or significant revision of PIs;
6. specific ROP-related safety culture activities beyond communication and education; and
7. items specifically identified by the Commission.

The staff should notify the Commission of the following ROP changes prior to implementation using an appropriate method based on the urgency and complexity of the change, such as an informational Commission paper, a Note to Commissioners' Assistants, or a briefing of Commission staff.

1. Significant changes¹ to the implementation of existing ROP programs (e.g., baseline and supplemental inspection procedures, implementation of the CCI process, implementation of SDPs, implementation of the assessment program);
2. changes to definitions affecting the Action Matrix other than threshold changes;
3. ~~adding or deleting~~ addition, deletion, or significant revision of baseline inspections; and
4. pilot program plans and results that involve licensee participation.



Stephen G. Burns

¹ For the purpose of this criterion, changes involving notable differences in the level of industry or NRC effort, garnering extensive stakeholder feedback, or impacting the publicly available outputs of the ROP should be considered "significant changes."