

Follow-on COVID-19 Lesson Learned Working Group Recommendations

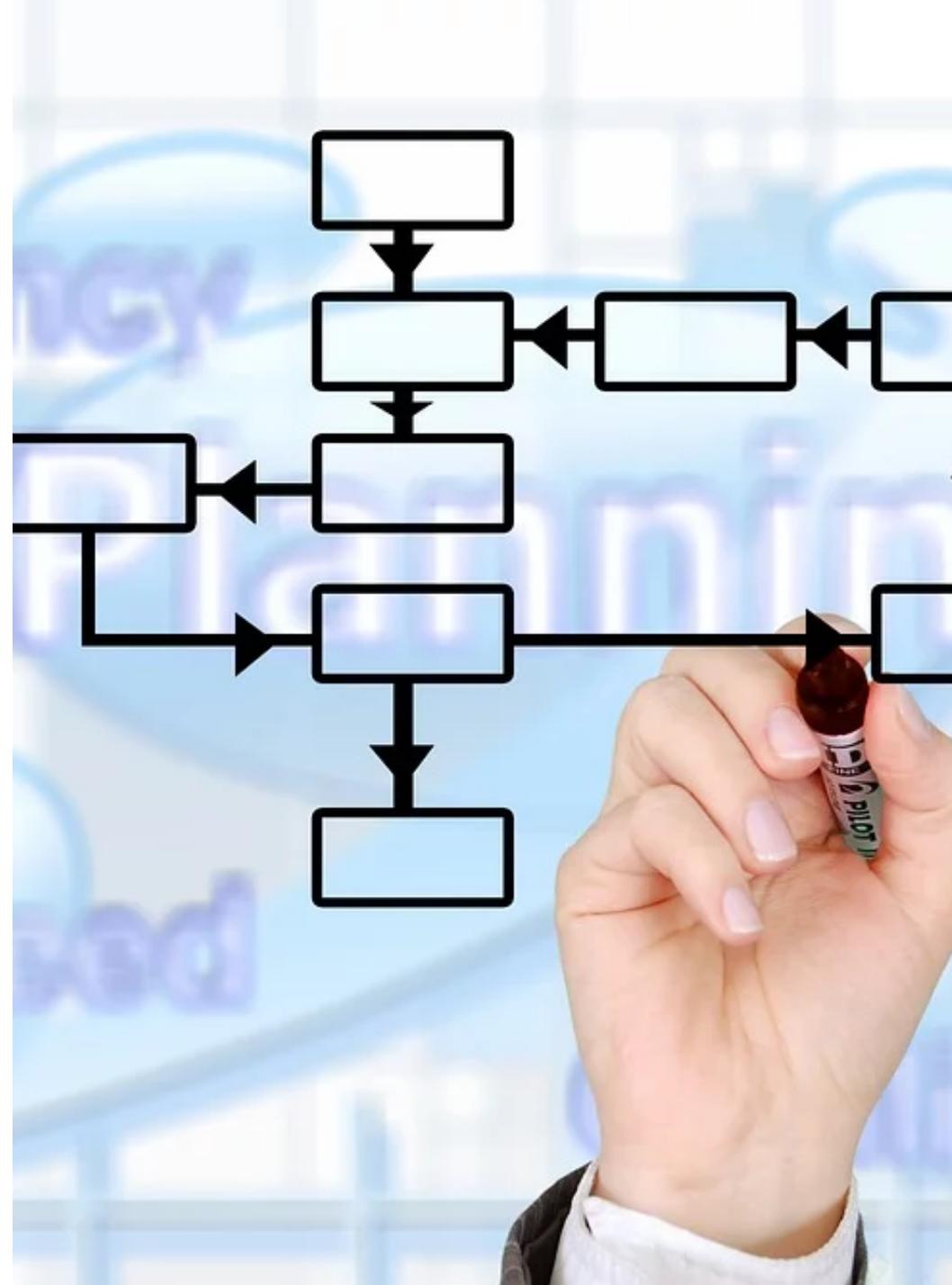
ROP Public Meeting

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Jeff Bream

The WG's conclusions align with internal and external feedback

- The NRC responded to the PHE by exercising existing flexibilities within the ROP, through modern communications technology, and innovative approaches to inspection.
- There is broad agreement that on-site and in-person inspection remains the most effective and preferred inspection method for most NRC inspection activities.
- Inspection program flexibilities exist to allow for performing portions of inspections remotely.



Recommendation 1: Improve Guidance for Future Events

- NRR guidance for inspectors was high level. Regions adopted similar but slightly different inspection prioritization and evaluation methodologies.
- Staff effort was spent in duplicative assessments that could have benefitted from early standardization.
- The WG concluded that future events would benefit from a deliberate and systematic prioritization of inspection activities.

Recommendation 2: Standard Definition of On-Site, Remote, and Hybrid Inspection

- The WG identified that internal and external stakeholders had different definitions of hybrid inspection.
- IMC 2515 would be an appropriate location of a standardized definition to ensure consistency.
- Draft definitions were developed as a starting point for consideration.

Recommendation 2: Definition of On-Site Inspection

- An on-site inspection is an inspection strategy in which all inspection requirements are performed through direct observation of licensee personnel, walkdowns of licensee equipment, and the review of licensee documents and records. Licensee document and record review is performed on-site utilizing licensee resources or personnel to retrieve documents.

Recommendation 2: Definition of Remote Inspection

- A remote inspection is an inspection strategy in which all inspection requirements are performed from a remote location requiring limited licensee interaction and coordination. No on-site observation or walkdown is required to complete remote inspections and limited requests for information is expected. This is anticipated to rarely apply to NRC inspections. If extensive interaction with licensee personnel occurs or is anticipated during a remote inspection, the inspection lead should transition to a hybrid or on-site inspection strategy.

Recommendation 2: Definition of Hybrid Inspection

- A hybrid inspection is an inspection strategy that provides flexibility in the planning and execution of the inspection activity. Some inspection requirements are required to be performed through direct observation and/or face-to-face licensee interaction and some inspection requirements associated with licensee document and record review, and meetings and/or interviews with licensee personnel may be performed remotely. On-site verification, observation, or walkdown by the inspection team is required to complete a hybrid inspection.

Recommendation 3: Hybrid Inspection During Normal Periods

- There are advantages to performing some inspection activities from off-site locations.
- Inspection planning and communication with licensee personnel is key to efficient and effective hybrid inspection.
- Additional guidance in IMC 2515 or IMC 2901 would be appropriate to describe hybrid inspection methods and controls, inspection planning, and licensee communications.

Recommendation 4: Continue Virtual Meetings

- Licensees communicated to the WG that virtual entrance meetings, exit meeting, and inspection interviews were advantageous.
- Inspectors agreed that virtual meetings were more widely attended, which improved some communications with licensees.
- Enhance guidance to clarify that virtual meetings are acceptable for inspections and should be considered when they may benefit efficiency and effectiveness.
- Clarify guidance that entrance meetings are optional for most inspection activities and should be discretionary.

Recommendation 5: Long-Term Improvements to Inspector Access to Licensee Information

- Access to licensee documents and records are vital to successful regional inspections.
- Improved access to documents will enhance on-site, remote, and hybrid inspection activities.
- Identify voluntary enhancements to document sharing that will benefit both the NRC and licensees in a cost-effective manner.

Recommendation 6: Short-Term Improvements to Inspector Access to Licensee Information

- Multiple methods currently exist for licensees to share documents and records with NRC inspectors.
- Endorsement of a specific method is not necessary, but enhancements can improve inspection efficiency.
- A list of standards and expectations for document sharing was developed by the WG for consideration.
- Hybrid and on-site inspections can be tailored to the information sharing methods implemented by licensees.

Recommendation 6: Standards and Expectations for Consideration

1. Compliance with IT security and other requirements.
2. Licensee and NRC ability to upload and download documents.
3. Licensee and NRC ability to log questions, information requests, and responses.
4. Tracking system for open, closed, and resolved questions and requests.
5. A repository of basic references (e.g., Tech Specs, UFSAR, select licensee procedures, etc.)

Recommendation 7: Coordination with Licensee Stakeholders

- Development of short- and long-term improvements to inspector access to licensee information must include industry.
- Developed solutions must be flexible and voluntary to account for different licensee business practices.

Recommendation 8: Resident Inspector Use of Licensee IT Resources

- The NRC has a Memorandum of Understanding (MOU) with every site that describes the resident's access to licensee systems.
- Before and during the PHE, many sites granted access beyond their MOU.
- Regions should ensure the current MOUs with licensees to reflect current access and update controls and restrictions, as appropriate.
- The WG explored a standardized MOU, but licensee feedback was that differing licensee business practices would make it difficult.
- Inspectors should not use personal equipment to access licensee network resources (Recommendation 9)

Recommendation 10: Effective NRC Training

- Many internal training courses were converted to virtual during the PHE.
- TTC should consider evaluating the long-term effectiveness of performing training virtually vs in-person.

Recommendation 11: ROP Monitoring for Adverse Trends

- The PHE is still ongoing. Continued vigilance of any potential adverse impacts through the ROP is prudent.
- The ROP is sufficient, as is, to monitor for adverse trends attributable to the PHE.

Recommendation 12: Coordination within the NRC

- Many of the recommendations contained in the report are applicable to multiple NRC offices.
- NMSS and NSIR have expressed interest in coordination on next steps
- Application of lessons learned should be consistent across the NRC offices and regions



Next Steps

- Issue the publicly available working group report
- NRC Management consideration and endorsement of the recommendations
- Implement the endorsed recommendations with input from appropriate stakeholders

Questions?