

# Revisions to the Fuel Cycle Oversight Process

## Presentation to the Commission April 29, 2010

### **Agenda**

- Current ProcessJoe Shea
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- Proposed Revisions –
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## Overview of the Current Fuel Cycle Oversight Process

- Oversight Process Elements
  - Inspection
  - Enforcement
  - Assessment
- Implementation

## Overview of the Current Fuel Cycle Oversight Process (Cont.)

- Current program is adequate to ensure safety and security
- Current program is evolving, slowly, within existing framework
- Approach to improvements can be better focused, more effective and efficient

### Purpose of Oversight Revision Project

- To improve program effectiveness and efficiency
- To make the process more
  - Risk-Informed
  - Performance-Based
  - Predictable
  - Transparent

### Risk Informed & Performance Based- Current Program

#### Inspection

- Use of Integrated Safety Analyses (ISA) during inspection planning improves risk focus
- Programmatic approach still used in some areas

#### Enforcement

Proposed policy is more ISA-informed

### Risk Informed & Performance Based- Current Program

- Assessment
  - Process allows for integration of enforcement actions
  - Some consideration of risk

## Predictability - Current Program

- Inspection
  - Reactive and initiative inspection decisions lack clear thresholds
- Enforcement
  - Variability in ISA methods presents a challenge

## Predictability - Current Program

- Assessment
  - Relationship between NRC inspection effort, assessment periodicity, and enforcement history is not well defined
  - Assessment process lacks thresholds for specific licensee and NRC actions

## Transparency - Current Program

- Inspection
  - Inspection and enforcement results are generally publicly available
  - Use of webpage to present process and outcomes can be improved
- Enforcement
  - Consideration of risk escalators and mitigators not transparent

### **Proposed Plan**

- Oversight Framework
- Risk-Informed Baseline
- Significance Determination
- Performance Assessment
- Enforcement

#### **Schedule of Activities**

- Technical Basis Development
- Process Development
- Transition
- Stakeholder Engagement

## Technical Basis for Risk-Informing

- Use existing ISA's
- Screening tool for items of very low safety significance
- Significance determination flow-charts
- Validation
- Facilities without ISA's

### **Definition of Risk Thresholds**

- Two Options Evaluated
  - Qualitative
  - Quantitative

Recommendation is for the qualitative

### **Risk-Informing**

- Baseline Inspections
- Significance Determination Process
- Enforcement Policy
- Action Matrix

### Challenges

- Diversity of operation and activities among licensees and certificate holders
- Cumulative impacts
- Performance Deficiency definition
- Corrective Action Program inspection

### **Potential Policy Issues**

- Deferral of Performance Indicator development
- Risk Surrogates and Thresholds
- Incorporation of Safety Culture
- Performance Deficiency
- Security/Safety program interface

### **Alternative Approaches**

- Proposal aligned to ROP principles
- Other options include:
  - Maintain current approach with evolving processes
  - Modest enhancements to current process
  - Phased revision over longer period

#### Conclusion

- Current process is adequate but needs to be improved
- Proposed improvements would use existing ISA's
- Proposed implementation in 2014
- Staff awaits Commission direction