

NRC INSPECTION MANUAL

PIPB

MANUAL CHAPTER 0302

INSPECTION PROGRAM EVALUATION ACTIVITIES

0302-01 PURPOSE

To establish procedures and set forth responsibilities for evaluation of the NRC inspection program for operating commercial reactors.

0302-02 OBJECTIVES

02.01 To evaluate the effectiveness and implementation of the NRC inspection program.

02.02 To review feedback provided by the regions and headquarters organizations on the effectiveness of the inspection program structure and content, and level of support from the NRR divisions.

02.03 To identify and recommend improvements in inspection program content and implementation as a result of findings obtained from the evaluation activities.

0302-03 BACKGROUND

The NRC establishes regulations and guides for the construction and operation of nuclear reactors. Organizations licensed by the NRC must abide by these regulations and are directly responsible for designing, constructing, testing, and operating their facilities in a safe manner. The NRC, through its licensing and inspection programs, provides assurance that the licensees are meeting these responsibilities. As established in 10 CFR Part 1.43 (e), the Office of Nuclear Reactor Regulation (NRR) is responsible for providing guidance and implementation direction to Regional Offices on reactor licensing, inspection and safeguards programs assigned to the Regions, and appraises Regional program performance in terms of effectiveness and uniformity.

The NRC Inspection Manual establishes programs, policies, requirements, and procedures for implementation of the NRC inspection program(s). Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection program," establishes the inspection policy for the operating reactor inspection program. As detailed in IMC 2515, the objective of the inspection program is to ensure licensees are

operating facilities safely by (1) providing one of several bases for conclusions on both individual licensee and industry-wide performance for allocating resources, (2) ensuring that the licensee's systems and techniques for conducting internal inspections and maintaining control result in safe operations, (3) finding and resolving plant-specific safety concerns that have generic significance, and (4) identifying significant declining trends in performance and

performing inspections to verify that the licensee has resolved the issue before performance declines below an acceptable level.

The reactor inspection program evaluation process is intended to provide independent assurance, along with self-assessment activities conducted by the regional offices, that the inspection program is effective in achieving the above objective, and is implemented consistently and in accordance with program policy. Feedback obtained as a result of the evaluation process will be used to improve the effectiveness and implementation of the inspection program.

0302-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Director, Office of Nuclear Reactor Regulation

- a. Oversees inspection program effectiveness and implementation.
- b. Provides overall policy direction for the evaluation process.
- c. Annually, issues a report to the EDO on the inspection program and on the program's overall effectiveness and implementation along with any improvement actions. The report will address both strengths and weaknesses of the inspection program implementation and recommend improvements.

04.02 Director, Inspection and Support Programs (DISP)

- a. Ensures overall inspection program effectiveness and uniformity.
- b. Oversees the implementation of the inspection program evaluation activities.

04.03 Chief, Inspection Program Branch (PIPB)

- a. Manages implementation of the inspection program evaluation activities.
- b. Conducts ongoing inspection program evaluation activities.
- c. Develops conclusions regarding inspection program effectiveness and implementation.
- d. Prepares annual report to the EDO on the inspection program and on the overall effectiveness and implementation along with any improvement actions.
- e. Monitors the effectiveness of corrective actions that are developed in response to assessment findings.

04.04 Regional Offices

Provide feedback to the Program Office on inspection program improvements obtained as a result of the IPAP or any other

regional self-assessment activities performed at the discretion of the Regional Administrator.

0302-05 INSPECTION PROGRAM EVALUATION ACTIVITIES REQUIREMENTS

NRR will conduct inspection program evaluation activities with the objective of determining whether the inspection program is effective in achieving established objectives and is implemented consistently and in accordance with established policies, requirements, and procedures. NRR will evaluate the inspection program through both ongoing and periodically conducted activities.

Ongoing Evaluation Activities

05.01 PIPB will monitor implementation of the inspection program on an ongoing basis, including inspection and inspection-related activities, and inspection results, etc. PIPB will compare inspection program execution with inspection program requirements and will propose revisions to the inspection program as appropriate. Ongoing activities will include review of the following:

- a. Inspection reports.
- b. Diagnostic evaluation team reports.
- c. Augmented inspection team reports.
- d. Inspection followup of significant events.

05.02 PIPB will monitor implementation of major policies and practices and the implementation of new or revised policies which were introduced as improvements to the inspection program. These policies will be selected by NRR management to reflect their current interests and concerns. Examples of what may be reviewed include the following:

- a. Implementation of the Plant Performance Review (PPR) process.
- b. When, if, and how inspections are announced.
- c. Threshold for identification of open items, how long items have been open, and how items are tracked.
- d. How Licensee Event Reports (LERs) are closed and tracked.
- e. Determining whether inspectors have completed newly required training courses (FOI refresher and PRA).
- f. Determining whether licensee self-assessments result in overall reduced NRC inspection, percent of inspections performed as self-assessments, and basis for denying approval for a self-assessment.

05.03 PIPB staff, in consultation with the Performance Evaluation and Assessment Section Chief and PIPB Branch Chief, will select candidate sites within the third quartile ranking of performance and conduct long-term trending of all available objective information regarding performance to obtain insights on whether the processes for evaluating licensee performance are being implemented effectively.

05.04 PIPB will visit regional offices to attend various meetings and activities including resident meetings, inspections, inspection exits, periodically conducted plant performance reviews, and meetings between NRC managers and licensees.

Periodic Evaluation Activities

05.05 PIPB will conduct audits of selected inspection topics. Annually, PIPB will develop a list of audit topics and an audit plan that describes the audit activities. The audit plan will:

- a. List the topics to be audited.
- b. Describe the methodology for auditing.
- c. List a planned review schedule.

The Division Director of the Inspection and Support Programs will review the audit plan.

05.06 For each specific topic to be audited, PIPB will develop a detailed audit plan. The detailed audit plan will describe:

- a. The objective and scope of the audit.
- b. How the audit will be conducted.
- c. The sample size to be audited.
- d. A schedule of the major milestones with dates.
- e. The criteria to be used for the audit.

After conducting the audit, PIPB will document and issue the results and any recommendations to the Director, NRR and the Regional Administrators.

05.08 PIPB will participate in Integrated Performance Assessment Processes (IPAPs) conducted by NRR. In addition to inspecting in assigned areas, PIPB will work with the team leader to develop feedback to the Director, NRR on the effectiveness of regulatory programs.

05.09 Annually, PIPB will consolidate the results of all activities, including evaluation of the results of ongoing and periodic activities along with feedback from the IPAPs and any other feedback to arrive at conclusions regarding inspection program effectiveness and implementation. The results will be issued in a report to the Director, NRR.

END