

Exelon Comments on Draft Changes to Inspection Manual Chapter 0612, “Power Reactor Inspection Reports”

- Page 1 Definition of Cross-Cutting Aspect: The change in this definition appears to imply that all performance deficiencies would have a cross-cutting aspect, since the aspect is now defined as the “most significant” contributor to a performance deficiency, where previously the aspect was defined as playing a “significant role.” There are many examples of performance deficiencies in which the cross-cutting aspects play only a minor role; forcing a selection of the most significant of these is inappropriate. The definition should retain the original formulation that an aspect would only be assigned if it were a significant contributor.
- Page 3 Definition of Performance Deficiency: See Page 1 comment.
- Page 7 Section 05.05: See Page 1 comment.
- Page 11 Note at the end of Section 06.03.b: Combining multiple examples of greater than green findings may be appropriate in those cases where the examples are associated with the same event and have the same cause, performance deficiency, and cross cutting aspect. In these cases, counting examples as individual findings would in effect be double counting.
- Page 21 Section 11.03.c.1, Second Paragraph: For consistency with Section 06.03.c.5 (page 13). This section should include the instruction to briefly document the reason that no cross-cutting aspect was assigned if applicable.
- Page B-6 Section 5.a: Same comment as Page 1.
- Page B-7 Section 5.b.(2): This question describes the screening process slightly differently than is implied in the previous descriptions in this document. The question asks, “Is the most significant contributor to the performance deficiency related to a cross-cutting area ...? This implies that a cross-cutting aspect would not be assigned unless the most significant contributor is related to a cross-cutting area. The earlier descriptions imply that the most significant cross-cutting aspect related to the issue would be assigned. This is a subtle but important difference. The various descriptions of this issue on Pages 1, 3, 7, B-6, and B-7 should be revised to be internally consistent and to emphasize that a cross-cutting aspect should only be assigned if the aspect was a significant contributor to the performance deficiency.

**Exelon Comments on Draft Changes to
Inspection Procedure 71152, “Identification and Resolution of Problems”**

- Page 5 Section 02.03.d: The meaning of “issues that pose challenges to the free flow of information for adequate resolution” is unclear. This needs additional specificity.
- Page 13 Section 03.03.b.2: The second to last sentence in this section might imply that actions in response to safety culture assessment results would be considered as corrective actions that are required per criterion XVI of 10 CFR 50, Appendix B. Suggest replacing this sentence with the following: “Review the adequacy of actions taken by the licensee to address the results of periodic safety culture assessment.”
- Page 13 Section 03.03.b.3: Inspection Procedure 95003 was written to evaluate third-party safety culture assessments when performance has substantially declined. This necessitates a broad scope, multi-disciplined team, and a comprehensive assessment methodology. In contrast, self- and independent assessments of safety culture may be requested by the NRC in response to an extended substantive cross-cutting issue, which could involve as few as four green findings that have a common theme and share the same cross-cutting aspect. The approach to assessing safety culture in this instance would be different from a third party assessment. The focus of the effort would be on the underlying issues for the cross-cutting aspect involved and the safety culture implications of these issues. This could result in the selection of one assessment method, such as surveys, interviews, or focus groups, but would seldom require multiple overlapping methods. Thus, it would not be appropriate to expect the same scope and methodology for a safety culture assessment requested by the NRC as for a 95003 inspection.
- Additionally, the last paragraph in this section suggests that licensees would be expected to conduct additional safety culture assessments to address issues or weaknesses identified by the NRC. This paragraph should be written more generally to state the licensees would be expected to address issues or weaknesses identified by the NRC.