



Meeting On Draft Enhancements to  
Reactor Oversight Process Safety  
Culture Guidance  
with ROP Task Force

**April 17, 2008**

## Meeting Logistics

- Attendance list sign in
- Feedback forms available
- Bridge line protocol (use mute function)
- Use of elevator to ground floor w/o escort
- Meeting handouts
- Limited beverages available in auditorium lobby

# Opening Management Statements

- NEI
- NRC

## Purpose

- Provide an overview of lessons learned inputs
- Provide drafts of safety culture related changes to key documents (IP95003 and IMC0305)
- Provide an overview of some other safety culture changes in-progress (IMC0305 components and aspects, IMC0612, IP71152)
- Provide a forum for external stakeholder clarifying questions and initial comments
- To discuss next steps including opportunity for follow-up external stakeholder comments

## Success Statement for Meeting

- Open dialogue about draft working level approaches
- Obtain initial external stakeholder questions and comments
- Provide external stakeholders with sufficient information to help develop follow-up comments

## Meeting Ground Rules

- Meeting between the NRC and the Reactor Oversight Process Task Force
- Opportunities will be provided for questions and initial comments from all external stakeholders as time permits
- Commenter responsibilities – identification, conciseness

## Caveats / Disclaimers

- Early in the evaluation process
- Options are still being developed
- Information reflects only working level products
- Need for NRC management reviews
- Need for consideration of external stakeholder initial and follow-up feedback
- All current ROP provisions remain in effect until formally changed!

## Overall ROP Safety Culture Plan

- Considering lessons learned over 18-month implementation
- General description will be in 2007 ROP self-assessment Commission paper
- Seeking to identify options to improve effectiveness and efficiency of ROP guidance related to safety culture
- Interacting with internal and external stakeholders
- Plan to roll out changes by the end of August 08



## **Safety Culture Lessons Learned Evaluation Inputs and Products**

- Inputs: NRC reviews and audits, IP95003 implementation feedback, industry surveys, ROP self-assessment surveys, ROP internal feedback forms, Safety Culture Focus Team activities, ROP monthly meetings
- Planned revisions to: IMC0305, IP9500X, IMC0612, IP71152

## Sharing Working Level Products

- Draft guidance documents – safety culture related changes only
- Reflective of working level evaluation of lessons learned inputs
- Minimal management review
- Provides early opportunity for consideration of external feedback

## **Sharing Working Level Documents - continued**

- 4 week follow-up comment period
- Staff will consider comments received and revise guidance as deemed appropriate
- Documents will proceed through internal review and concurrence process

## Cross-cutting Aspect Review

- RIV-led Task Group effort
- Cross-cutting aspect assignment review
- Focus on regional implementation of IMCs 0305 (assessment process) and 0612 (inspection reports)
- Observation of inspection debriefs and mid-cycle assessments
- Sample review of inspection reports

## **Cross-cutting Aspect Review Recommendations**

- Conduct of inspection debriefs (Outside safety culture scope)
- Augment IMC0612 guidance for assigning and documenting cross-cutting aspects (Will present overview of IMC0612 changes related to safety culture)

## **Cross-cutting Aspect Review Recommendations - continued**

- Provide periodic training on ROP guidance changes (Outside safety culture scope)
- Need to clarify cross-cutting theme (Change to IMC0305)
- Need to remove duplication between substantive cross-cutting issue Criterion 1 and 2 (Change to IMC0305 sections)

## **Palo Verde IP95003 Recommendations**

- First implementation of IP95003 safety culture assessment
- 28 discrete recommendations resulted from the inspection
- Some are non-safety culture related
- Will discuss items related to IMC0305 and IP95003 safety culture sections

## **Overview of Palo Verde IP95003 Recommendations**

- Re-examine “Other” cross-cutting components
- Clarify assignment of multiple cross-cutting aspects to a finding
- Consideration to integrate repetitive substantive cross-cutting issue within the action matrix
- More guidance on collective risk assessment



## **Overview of Palo Verde IP95003 Recommendations- continued**

- Development of NRC endorsed licensee safety culture assessment process for IP95003 and IMC0305 requests
- Allow greater flexibility on IP95003 inspection timing
- Consider precursors predictive of licensee declining performance

## Draft ROP Guidance Documents

- Bar line text shows additions from current approved version
- Most deletions from current approved version are in bubbles on right hand side of the page
- Comment bubbles are used for explanation and noting related lesson learned input

## IMC0305

- Response to repetitive substantive cross-cutting issue (pages 45 -46) with the same cross-cutting aspect
- For 2<sup>nd</sup> substantive cross-cutting issue: follow-up with problem identification and resolution inspection annual sample review

## **IMC0305 – continued**

- For 3<sup>rd</sup> substantive cross-cutting issue with the same cross-cutting aspect:
  - If in problem identification or resolution area, clarified typical request is for an independent licensee safety culture assessment

## **IMC0305 – continued**

- If licensee resolution for substantive cross-cutting issue determined non-timely, conduct a focused problem identification and resolution team inspection on annual basis
- Intent of inspection is to ensure appropriate level of licensee oversight of corrective actions

## **IMC0305 – continued**

- Recognition that safety conscious work environment issues can legitimately take longer to resolve
- Region can defer conduct of follow-up problem identification and resolution focused inspection and of licensee safety culture assessment request until the 4<sup>th</sup> consecutive safety conscious work environment substantive cross-cutting issue

## **IMC0305 – continued**

- Added definition for safety culture assessment (page 3 – 4)
- Clarified self-, independent, and third party assessor definitions
- Clarified expectations on scope of assessment
- Clarified expectations for safety culture assessor personnel performing the assessment

## **IMC0305 – continued**

- Added clarification for NRC to use appropriate inspection attributes from IP95003 to evaluate a licensee's safety self- and independent safety culture assessment (pages 19 and 45)



## **IMC0305 – continued**

- Modified to acknowledge NRC graded safety culture assessment (page 20)
- Based on results of evaluating licensee third party safety culture assessment methodology and implementation
- Details in IP95003 to be discussed later

## **IMC0305 – continued**

- Inputs for a safety conscious work environment substantive cross-cutting issue (page 37)
- Longer time frame of 3 assessment periods
- Allows staff sufficient time to have confidence that licensee has made progress in addressing the issue

## **IMC0305 – components/aspects**

- Adjustment to safety culture components/aspects
- Integration of 4 “Other” safety culture components into cross-cutting components

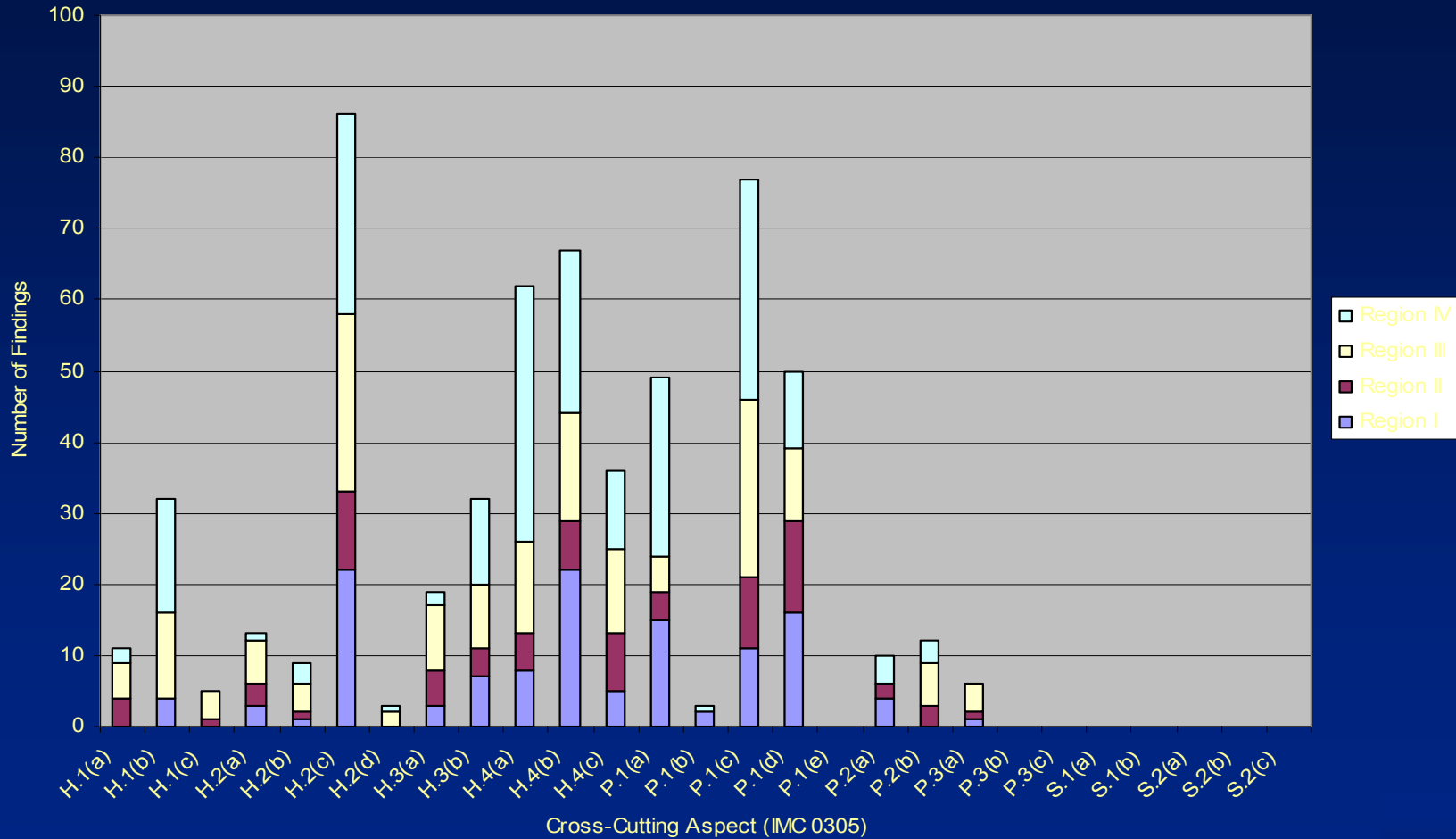
## **IMC0305 - components/aspects continued**

- Adjustment to components and aspects to remove duplication, sharpen focus, consideration to reorganize
- Considering assignment to findings at component level
- Will result in changing substantive cross-cutting issue threshold (review of past data)

## **IMC0305 - components/aspects continued**

- Possible change in cross-cutting areas
- Comments on pros/cons to tag findings at component level
- Draft changes to cross-cutting components and aspects to be shared during a future public meeting

Chart 1 - Composite Distribution of Findings by Cross-Cutting Aspect for All Regions  
(10/1/2006 - 9/30/2007, run on 11/5/2007)



## **IMC0305 - continued**

- Opportunity for external stakeholder questions and initial comments

## IP95003 changes

Concept of a NRC graded safety culture assessment (pages 14 – 16 and pages 52 – 61)

- Acknowledge potential for development of industry methodology for NRC review and endorsement
- Shift of focus to evaluate licensee 3<sup>rd</sup> party safety culture assessment first to inform NRC safety culture assessment
- Based on evaluation, conduct graded assessment activities



## IP95003 changes - continued

- Depending on timing, i.e., prior to conduct of 3<sup>rd</sup> party assessment, engage licensee for NRC review of:
  - Assessment methodology
  - Qualifications of team
  - Any revisions to methodology or team based on NRC review feedback
- Post-conduct of 3<sup>rd</sup> party assessment, evaluate the comprehensiveness of the 3<sup>rd</sup> party assessment (no change)
  - Coverage of all functional groups
  - Coverage of all levels of organization including corporate
  - Sufficient sample sizes
  - Coverage of all safety culture components

## IP95003 changes - continued

- Evaluate the methodology and tools used by the 3<sup>rd</sup> party assessment (no change)
- Review independence and qualifications of 3<sup>rd</sup> party personnel (no change)

## IP95003 changes - continued

- Determine scope of scope NRC safety culture assessment activities, based on evaluation of 3<sup>rd</sup> party assessment
  - Range from limited activities to full NRC independent safety culture assessment
- Evaluate licensee response and corrective actions (no change)

## IP95003 changes - continued

- If weaknesses not identified with 3<sup>rd</sup> party methods/qualifications, focus will be on licensee response
- Evaluate licensee progress in:
  - Performing evaluation of assessment results
  - Identifying appropriate corrective actions
  - Developing action plans
  - Implementing corrective actions

## IP95003 changes - continued

- If weaknesses with comprehensiveness, conduct targeted assessment activities focusing on:
  - Groups/levels not sufficiently covered or inadequately sampled
  - Safety culture components inadequately covered
- If weaknesses with methodology/qualification, conduct sampling activities to evaluate consistency of results
- Results used to adjust scope of graded assessment as needed
  - Up to full NRC independent safety culture assessment

## IP95003 changes - continued

- Provision for full NRC independent safety culture assessment
  - Detailed guidance in Enclosures A – F relocated to ADAMS
  - General guidance in Attachment 2
    - Most content moved from current IP 95003
    - Technical content of Enclosures A – F is unchanged from current IP95003

## **IP95003 changes - continued**

- Option retained for prompt conduct of focused strategic performance area aspects and full safety culture assessment to diagnose scope of plant performance issues (page 20)
- Clarified flexibility on timing of inspection elements (page 20)

## **IP95003 changes - continued**

- Amend approach to be more diagnostic (page 2)
- As time permits perform Significance Determination Process evaluation
- Greater use of Unresolved Items (for issues likely to be Green) to defer workload to develop the inspection issue



## **IP95003 changes - continued**

- Opportunity for external stakeholder questions and initial comments

## IMC0612

- IMC0612 will be revised consistent with IMC0305 changes (potential for cross-cutting components)
- Adding guidance for determining whether cross-cutting aspect is reflective of current performance
- Decision cannot be made solely based upon the time when the performance deficiency or event occurred
- Need to determine when the cause of the problem occurred

## IMC0612- continued

- When did the performance deficiency or event occur?
- If the performance deficiency or event was the result of a latent issue, when did the cause of the performance deficiency occur?
- If the performance deficiency or event was the result of a latent issue, did the licensee have reasonable opportunities to identify the problem?
- Have programs, processes or staff changed such that the problem would not occur today?

## IMC0612- continued

- A performance deficiency identified associated with an inadvertent start of safety–related equipment which occurred a month ago.
- The inspector determines the actuation was caused by an inadequate site procedure written six years ago.
- The potential cross-cutting aspect is H.2(c) as the procedure was not adequate.
- Since the cause of the performance deficiency occurred six years ago when the inadequate procedure was written the cause is not reflective of current performance.
- If, however, the licensee had an opportunity, within approximately the last two years, to review the technical content of the procedure and could reasonably have been expected to identify the procedural inadequacy then the cause of the performance deficiency (H.2(c)) would be considered current performance.

## IMC0612 - continued

- Clarifying guidance on relationship between performance deficiency and cross-cutting aspects
- Augmenting guidance for documentation of cross-cutting aspects
- Developing guidance to assign cross-cutting aspects to findings with multiple examples
- Providing additional documentation guidance when cross-cutting aspect not assigned

## **IMC0612 - continued**

- Opportunity for external stakeholder questions and initial comments

## **IP71152 – Identification and Resolution of Problems**

- Clarify NRC review of licensee safety culture assessment also to develop overall biennial team safety conscious work environment assessment
- Will evaluate adequacy of licensee corrective actions to address safety culture assessment issues
- Safety conscious work environment performance assessment insights gained through NRC interviews and insights from licensee safety culture assessment

## **IP71152 – Identification and resolution of problems - continued**

- Reference applicable IP95003 evaluation criteria for use when using IP71152 to follow-up on request by NRC for licensee safety culture assessment



## **IP71152 – Identification and resolution of problems - continued**

- Opportunity for external stakeholder questions and initial comments

## Open Discussions

- Opportunity for external stakeholder questions and initial comments

## Follow-up Comments

- Comments in 4 weeks (by May 15<sup>th</sup>)
- E-mail to: [robert.gramm@nrc.gov](mailto:robert.gramm@nrc.gov)
- Snail mail to:

USNRC

Attn: Robert Gramm O11A11

Washington, DC 20555

## Next Actions

- Another public meeting [date TBD]
- Provide draft IMC0305 cross-cutting components and aspects
- Provide draft IMC0612 (safety culture related)
- Provide IP95001, IP95002, and IP71152 drafts

# Closing