



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

May 14, 2008

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Purpose

- Provide drafts of safety culture related changes to ROP guidance documents (IMC0612 and IP71152)
- Provide a forum for external stakeholder clarifying questions and initial comments
- To discuss next steps including opportunity for follow-up external stakeholder comments

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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

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Overall ROP Safety Culture Plan

- Considering lessons learned over 18-month implementation
- General description is in 2007 ROP self-assessment Commission paper (SECY-08-0046)
- 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

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Sharing Working Level Documents

- Options are still being developed
- Information reflects only working level draft 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!

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Sharing Working Level Documents - continued

- Follow-up comment period – June 27th
- Staff will consider comments received and revise guidance as deemed appropriate
- Documents will proceed through internal review and concurrence process
- Resolution of comments will be made available

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IMC0612

- Proposed changes to IMC0612 resulting from NRC cross-cutting review and audit of sample inspection reports
- IMC0612 will be revised as-needed consistent with any related IMC0305 changes (potential for tagging findings with cross-cutting components)

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IMC0612- continued

- Adding guidance for determining whether cross-cutting aspect is reflective of current performance (App. B page B-7)
- 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

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IMC0612- continued

Questions for considering if the cross-cutting aspect is reflective of current performance:

- 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 organization changed such that the problem would not reasonably occur today?

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IMC0612 - continued

- Clarifying guidance on relationship between performance deficiency and cross-cutting aspects (pages 1, 3, 7, Appendix B page B-6)
- Augmenting guidance for documentation of cross-cutting aspects (page 13)
- Developing guidance for assigning cross-cutting aspects to findings with multiple examples (page 11, App. B page B-7)

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IMC0612 - continued

- Provide feedback and transparency if assigned cross-cutting aspect changes (page 9, 22)
- Providing additional documentation guidance when cross-cutting aspect not assigned (page 13, 21)
- Strengthened controls for consideration of multiple cross-cutting aspects (App. B page B-6)

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IMC0612 - continued

- Opportunity for external stakeholder questions and initial comments

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NRC Follow-up of Safety Culture Assessments

Case	Type of Licensee Safety Culture Assessment	Trigger for NRC request for licensee to perform a SC assessment	NRC Draft Review Guidance Location	NRC Review Focus
1	Periodic licensee self-initiated	None, licensee initiated	IP71152 (existing) biennial team inspection	1) how has licensee handled results from PI&R perspective, 2) derive insights for SCWE review
2	Licensee self-assessment	3rd consecutive repetitive human performance or SCWE substantive cross-cutting issue	IP71152 with reference to relevant IP95003 guidance (new)	1) limited review of how the safety culture assessment was performed, 2) primary focus on the licensee's evaluation of results and adequacy of corrective action plans/actions
3	Licensee independent assessment	3rd consecutive repetitive PI&R substantive cross-cutting issue OR IP95002 inspection identified that safety culture components not properly evaluated by licensee	IP71152 with reference to relevant IP95003 guidance (new)	1) limited review of how the safety culture assessment was performed, 2) primary focus on the licensee's evaluation of results and adequacy of corrective action plans/actions
4	Licensee third party assessment	In Multiple/repetitive Degraded Cornerstone column of the ROP action matrix	IP95003 (new graded approach)	1) evaluation of the third-party assessment methodology, 2) evaluate the licensee's evaluation of results and adequacy of corrective action plans/actions, 3) perform NRC graded safety culture assessment

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IP71152 – Identification and Resolution of Problems

- Considering locating guidance about follow-up on a NRC requested licensee safety culture assessment in another IP
- Possibly a new IP in 2515 Appendix C since rarely/infrequently used
- Providing draft 71152 safety culture assessment follow-up guidance for comment

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IP71152 – Identification and Resolution of Problems - continued

- Will evaluate adequacy of licensee corrective actions to address periodic self-initiated safety culture assessment issues (page 13)
- Clarify NRC review of licensee safety culture assessment also to develop overall biennial team safety conscious work environment performance assessment (page 16 and 17)
- Safety conscious work environment performance assessment insights gained through NRC interviews and insights from licensee safety culture assessment (page 16)

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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 (page 13-14)
- Limited sample review of licensee safety culture assessment scope, methodology, and tools.

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IP71152 – Identification and resolution of problems - continued

Focus of NRC review is on:

- The results of the licensee's safety culture assessment
- The licensee's evaluation of the assessment results
- The licensee's plans to address the weaknesses identified
- The licensee's progress in implementing effective actions to address the weaknesses

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IP71152 – Identification and resolution of problems - continued

- Opportunity for external stakeholder questions and initial comments

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Follow-up Comments

- Comments by June 27th
- E-mail to: robert.gramm@nrc.gov
- Mail to:

USNRC

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IMC0305 - next actions

- Follow-on public meeting [TBD]
- Provide draft IMC0305 cross-cutting components and aspects
- Request external stakeholder comments by June 27th on IMC0305 draft material presented at April ROP meeting
- Requested external stakeholder comments by May 23rd on IP95003 draft

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Closing