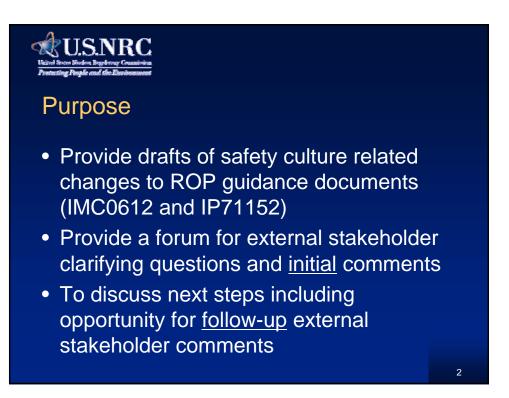


Meeting On Draft Enhancements to Reactor Oversight Process Safety Culture Guidance with ROP Task Force

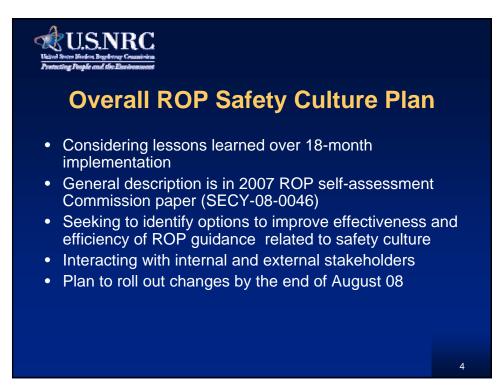
May 14, 2008



U.S.NRC

Success Statement for Meeting

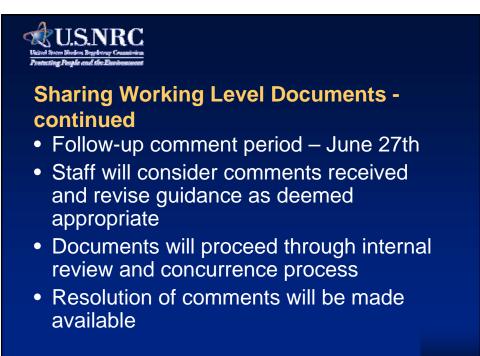
- Open dialogue about draft working level approaches
- Obtain <u>initial</u> external stakeholder questions and comments
- Provide external stakeholders with sufficient information to help develop <u>follow-up</u> comments



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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 <u>initial</u> and <u>follow-up</u> feedback
- <u>All current ROP provisions remain in</u> <u>effect until formally changed!</u>





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)



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



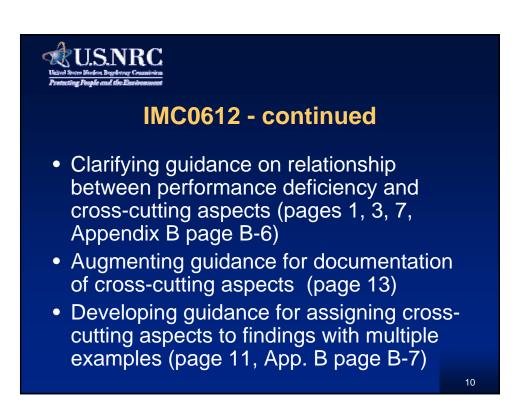
IMC0612- continued

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?

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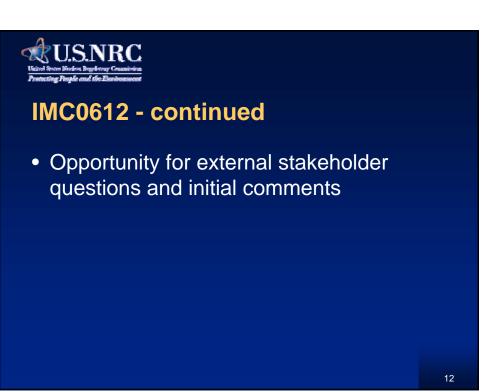
 Have programs, processes or organization changed such that the problem would not reasonably occur today?



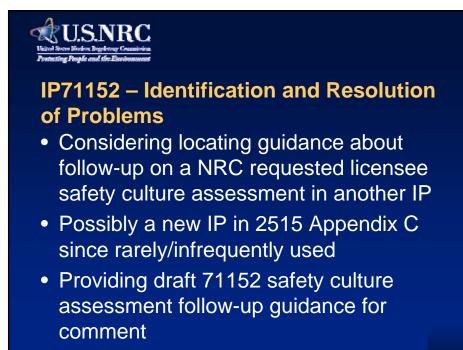
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IMC0612 - continued

- 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)



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
	Periodic licensee self-initiated	None, licensee initiated	IP71152 (existing) biennial team inspection	 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)	 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
	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)	 Iimited 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 - 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 <u>and</u> insights from licensee safety culture assessment (page 16)



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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Follow-up Comments

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

USNRC

Attn: Robert Gramm O11A11 Washington, DC 20555

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