Manual Chapter 0608

PERFORMANCE INDICATOR PROGRAM

0608-01 PURPOSE

This Inspection Manual Chapter (IMC) provides guidance on the implementation of the operating Reactor Oversight Process (ROP) Performance Indicator (PI) Program. It includes guidance on the process for modifying existing PIs and for developing additional PIs for use in the oversight process.

0608-02 OBJECTIVE

02.01 To provide policy and guidance regarding implementation of the ROP PI Program, including data submission, verification, and posting of data and frequently asked questions (FAQs) on the internal and external web.

02.02 To establish a formal process for responding to questions related to interpretation of PI reporting guidance and for developing and implementing changes to the PI Program, including creating new PIs and making changes to existing PIs or thresholds.

02.03 To provide information to licensees that is required by the Paperwork Reduction Act regarding licensee submission of PI data to the NRC.

0608-03 APPLICABILITY

This manual chapter applies to all operating commercial nuclear power reactors.

0608-04 DEFINITIONS

04.01 NEI 99-02 A guidance document used by licensees, which is jointly agreed upon by the NRC and the Nuclear Energy Institute (NEI), published by NEI, and entitled "Regulatory Assessment Performance Indicator Guideline."

04.02 Feedback Form A form contained in IMC 0801, "Program Feedback," used by NRC staff to submit a request to the Performance Assessment Branch (IPAB) of the

Office of Nuclear Reactor Regulation (NRR) for clarification of the PI guidance document.

04.03 Frequently Asked Question (FAQ) A question from an external stakeholder regarding the PI Program or its implementation. All FAQs submitted to the NRC by external stakeholders will be available on the NRC's internal and external web sites and will be discussed in public meetings. The web sites are periodically updated to include draft FAQs (i.e., FAQs for which the response has not yet been approved), tentatively approved FAQs, and FAQs that have been approved for use. FAQs can be viewed by cornerstone, PI, posting date, or identification number.

04.04 ROP Working Group A group composed of NRC staff and licensee representatives who meet typically once every month in an open public meeting to discuss FAQs and other issues related to the ROP PI Program.

04.05 Self-Assessment An annual report to the Commission on the Reactor Oversight Process.

04.06 Extended Shutdown For the purposes of the PI Program, a plant is considered to be in extended shutdown when the reactor has been subcritical for at least six months.

0608-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Director, Office of Nuclear Reactor Regulation (NRR)

a. Provides overall policy direction for the PI Program.

b. Directs the development and implementation of policies, programs, and procedures for the PI Program and oversight of program effectiveness and implementation.

05.02 Director, Division of Inspection and Regional Support (DIRS). Manages PI Program development and implementation within NRR and oversees program implementation and effectiveness.

05.03 Chief, Performance Assessment Branch

a. Develops policy, programs, and procedures for implementation of the PI Program.

b. Receives and posts PI data and FAQs on the internal and external web.

c. Manages and implements the process for responding to questions related to interpretation of PI reporting guidance and develops and implements changes to the PI Program, including creating new PIs and making changes to existing PIs or thresholds.

d. Assesses PI Program effectiveness and implementation.

05.04 Regional Administrator. Manages regional implementation of the PI Program in accordance with the requirements of this IMC, Management Directive (MD) 8.13, "Reactor Oversight Process," Inspection Procedure (IP) 71151, "Performance Indicator Verification," and IP 71150, "Discrepant or Unreported Performance Indicator Data."

0608-06 BACKGROUND

06.01 Framework

The ROP is built upon a framework directly linked to the Agency's mission. That framework includes cornerstones of safety that focus on the licensee's ability to (1) limit the frequency of initiating events; (2) ensure the availability, reliability, and capability of mitigating systems; (3) ensure the integrity of the fuel cladding, the reactor coolant system, and containment; (4) ensure the adequacy of the emergency preparedness functions; (5) protect the public from exposure to radioactive material releases; (6) protect nuclear plant workers from exposure to radiation; and (7) provide assurance that the physical protection system can protect against the design-basis threat of radiological sabotage.

Within each cornerstone, a broad sample of data on which to assess licensee performance in risk-significant areas is gathered from PI data submitted by licensees and from the NRC's risk-informed baseline inspections. The PIs are not intended to provide complete coverage of every aspect of plant design and operation, but they are intended to be indicative of performance within the related cornerstone.

Data submitted by each licensee are used to calculate PI values. These values are then compared to objective thresholds to determine the performance band associated with those values. The bands are color coded. Plant data for a PI that falls within the "green" band indicates licensee performance is within the nominal, expected range. The "white" band indicates that performance is outside of the nominal, expected range and can be characterized as of low to moderate safety significance, but performance remains acceptable. Performance in the "yellow" band indicates a more significant decline in performance and can be characterized as being of substantial significance. Performance is considered acceptable, but a reduction in safety margin exists. Performance in the "red" band indicates a very significant decline in performance. Changes can be characterized as being of high safety significance. Performance may be acceptable with a significant reduction in safety margin or may be unacceptable.

06.02 Performance Indicators

PIs are a means of obtaining information related to the performance of certain key attributes in each of the cornerstone areas. They provide indication of problems that, if uncorrected, may increase the probability and/or the consequences of an off-normal event. Since not all aspects of licensee performance can be monitored by PIs, safety significant areas not covered by PIs will be assessed through inspection.

a. For the reactor safety strategic performance area, the objectives of the cornerstones and PIs are as follows:

1. Initiating Events - this cornerstone is intended to limit the frequency of those events that upset plant stability and challenge critical safety functions during power operations. Such events include a reactor trip due to a turbine trip, loss of feedwater, loss of off-site power, and other reactor transients. The following indicators are provided in this cornerstone:
   - Unplanned scrams (automatic and manual) per 7,000 critical hours
   - Scrams with loss of normal heat removal
   - Unplanned power changes per 7,000 critical hours

2. Mitigating Systems - this cornerstone is intended to ensure the availability, reliability, and capability of systems that mitigate initiating events to prevent reactor accidents. Mitigating systems include those associated with safety injection, residual heat removal, and their support systems, such as emergency AC power. The following indicators are provided in this cornerstone:

   - Safety System Functional Failures - this PI monitors the readiness of the most important systems to perform their safety function(s).

   - Mitigating System Performance Index - this PI is calculated separately for each of the following five systems for each reactor type:

   BWRs
   - emergency AC power systems
   - high pressure injection systems (high pressure coolant injection, high pressure core spray, or feedwater coolant injection)
   - reactor core isolation cooling and/or isolation condenser systems
   - residual heat removal systems (or the equivalent function)
   - cooling water support systems for the above systems

   PWRs
   - emergency AC power systems
   - high pressure safety injection systems
   - auxiliary feedwater systems
   - residual heat removal systems (or the equivalent function)
   - cooling water support systems for the above systems

3. Barrier Integrity - this cornerstone is intended to ensure the integrity of the physical barriers designed to protect the public from radionuclide releases caused by accidents. These barriers are the fuel cladding, reactor coolant system boundary, and containment. The following indicators are provided in this cornerstone:

   - Reactor Coolant System (RCS) Specific Activity
   - RCS Identified (or total) Leak Rate

4. Emergency Preparedness - this cornerstone is intended to ensure that actions taken in accordance with the emergency plan provide adequate protection of public health and safety during a radiological emergency. The cornerstone does not include off-site actions, which are covered by the Federal Emergency Management Agency. The following indicators are provided in this cornerstone:

    - Drill/Exercise Performance
    - Emergency Response Organization Drill Participation
    - Alert and Notification System Reliability

b. For the radiation safety area, the cornerstones and PIs are as follows:

1. Occupational Radiation Safety - this cornerstone is intended to ensure adequate protection of worker health and safety from exposure to radiation and radioactive materials during routine civilian nuclear reactor operations. The following indicator is provided in this cornerstone:

    - Occupational Exposure Control Effectiveness

2. Public Radiation Safety - this cornerstone is intended to ensure adequate protection of public health and safety from exposure to radiation and radioactive materials released into the public domain as a result of routine civilian nuclear reactor operations. These releases include routine gaseous and liquid radioactive effluent discharges, the inadvertent release of solid contaminated materials, and the offsite transport of radioactive materials and wastes. The following indicator is provided in this cornerstone:

    - Radiological Effluent Technical Specifications (RETS)/Offsite Dose Calculation Manual (ODCM) Radiological Effluent Occurrences

c. For the safeguards area, the cornerstone and PIs are as follows:

1. Physical Protection - this cornerstone is intended to provide assurance that the physical protection system can protect against the design basis threat of radiological sabotage. The threat could come from either external or internal sources. Although the NRC is actively overseeing the Physical Protection Cornerstone, the Commission has decided that the related performance indicator, inspection, and assessment information will not be publicly available.

0608-07 PI DATA SUBMISSION

07.01 Reporting of PI Data

The information in this paragraph is required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Licensee submission of PI data constitutes an information collection, and therefore, must comply with requirements in the Paperwork Reduction

Act . The information collections contained in this manual chapter were approved by the Office of Management and Budget, approval number 3150-0195, which expires 11/30/08. The burden to the public for these voluntary information collections is estimated to be 200 hours per response, and 40 hours annually per utility to maintain records. This information is used by NRC to evaluate licensee performance as part of the reactor oversight process. Send comments regarding this burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to INFOCOLLECTS.RESOURCE@NRC.GOV; and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0195), Office of Management and Budget, Washington, DC 20503. Additionally, the NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

Reporting of PI data to the NRC is a voluntary program in which all licensees of operating reactor plants participate. To submit PI data, licensees send a delimited text file to the NRC at pidata@nrc.gov. Hard copy submissions, in accordance with 10 CFR 50.4 "Written Communications," are not required, except in the event that the email submission is unsuccessful. Within two business days of receipt of the PI data, the NRC will send each licensee a return email to confirm and authenticate receipt of the data. Licensees have four business days from receipt of the NRC's email to report any transmission problems to the NRC.

Once the data are confirmed by the NRC, they are entered into the Reactor Program System database to calculate the indicator values. Within five business days from receipt of the licensees' data transmissions, the NRC will post the data, the indicator values, and associated graphs on the NRC's internal web site. The regions will be notified when the PIs are available on the internal web site. This is to allow the regions an opportunity to become familiar with the PIs and to identify any obvious inconsistencies prior to public release. Within 10 business days of receipt of the licensees' data transmittals, the NRC will place the PIs on the NRC's external web site to make them available to external stakeholders.

07.02 PI Submission For Plants In Extended Shutdown

An operating commercial nuclear power plant with significant performance or equipment problems may be shut down for an extended period of time for a variety of reasons. Licensees may voluntarily or involuntarily shut down the plant due to significantly degraded performance, major equipment failures, or a significant plant event. In these cases, the NRC may make the decision to place the plant under the process described in Inspection Manual Chapter 0350, "Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational concerns." Plants in extended shutdown should report PIs in accordance with the guidance provided in the current version of NEI 99-02.

0608-08 PI VERIFICATION

08.01 Because of the importance of PIs in the ROP as a source of information regarding performance upon which agency actions will be based, PI data must be reported accurately. Inspection Procedure 71151, "Performance Indicator Verification," shall be conducted to review licensees' PI data collection and reporting activities for adherence to pertinent guidance. It is expected that licensees will make reasonable, good faith efforts to comply with the guidance in NEI 99-02. This includes taking appropriate and timely action to identify and report performance issues captured by the indicators. It may be necessary for inspectors to exercise some judgment on the adequacy of licensee actions to make a reasonable, good faith effort to comply with the guidance.

Discrepancies with the performance indicator data collection and reporting or with the actual data should be documented in accordance with IP 71151 and the requirements of Inspection Manual Chapter 0612, "Power Reactor Inspection Reports."

Enforcement action will be taken for inaccurate PI reporting in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions."

08.02 Discrepant or Unreported PIs

In the event the NRC determines that major discrepancies exist in the PI data submitted by a licensee that causes the Agency to lose confidence in the licensee's ability to collect and report PI data accurately, the affected PI(s) will be classified as discrepant. Examples of situations in which a PI would be considered to be discrepant may include but are not limited to the following: (1) recurring errors in the reported data; (2) recurring instances of incorrect interpretations of NEI 99-02; or (3) inadequate documentation of PI data.

When PI data has been determined to be discrepant or is not being reported by the licensee, IP 71150, "Discrepant or Unreported Performance Indicator Data," will be conducted. IP 71150 provides for the performance of selected inspection activities to compensate for the discrepant or unreported PI data. Regional management should coordinate activities in this area with IPAB. The selected inspections will be performed in addition to the baseline inspection. Once the licensee has corrected the root cause(s) of the discrepant or unreported data and the NRC has verified that the licensee can collect and report PI data accurately, oversight of PI reporting in accordance with IP 71151 will resume.

When a plant has been in an extended shutdown, some PIs may not provide a meaningful indication of plant performance in the areas they are intended to monitor. In these situations, the guidance provided in IP 71150 should be followed to obtain sufficient performance information via the inspection program until the plant has restarted and sufficient PI data has been collected.

0608-09 QUESTIONS AND FEEDBACK

The NRC has received many questions and comments regarding the PIs over the years. The staff expects that changes to existing PIs and thresholds as well as development of new PIs will occur. Therefore the NRC has established a formal

process to address questions and feedback from internal and external stakeholders, make changes to existing PIs and thresholds based on lessons learned, and develop new PIs and associated thresholds. This formal process is provided in Exhibit 1, "PI Process For Addressing Feedback and Questions." The process consists of the following four major components: input, evaluation, resolution, and closure.

The remainder of this IMC describes the formal process. Exhibit 1 (flowchart) may be referred to at any point hereafter to gain an understanding of the four phases of the formal process. The section numbers of this IMC are included at corresponding points in the flowchart to provide easy reference to the write-up of the respective section.

09.01 Input

NRC staff, industry, or the public may raise questions or provide feedback regarding an individual PI. Questions from the NRC staff should be documented in a Feedback Form and submitted to IPAB in accordance with IMC 0801. Questions raised by industry personnel should be documented in an FAQ and submitted to an industry member of the ROP Working Group. These questions will be provided to the NRC at periodic public meetings of the ROP Working Group. Questions raised by the public or other stakeholders should be submitted via email to the Office of Public Affairs at opa@nrc.gov. Alternatively, questions from the public can be submitted in writing to the United States Nuclear Regulatory Commission, Office of Public Affairs, Washington D.C. 20555. Regardless of their origin, all questions will be addressed in accordance with the process described below.

An NRC staff member with a question about a PI should first look in NEI 99-02 for guidance. If further clarification is required, he or she should search the FAQs on the NRC's internal or external web sites. If neither of these provides sufficient clarification, he or she should fill out a feedback form from the internal ROP web page. The inspector may also provide feedback on issues related to PI guidance or implementation, including observed or perceived instances of unintended consequences. Feedback forms will be forwarded to regional management for review and response, as appropriate. The purpose of the regional review is to allow regional management to be aware of questions or feedback being submitted and to provide an opportunity for the regions to resolve the issue for those they believe do not warrant headquarters review. All forms, including those to which the region has responded, will then be forwarded to the PIPBCAL email mailbox or mailed to the Chief, IPAB (mail stop O7H4).

Upon receipt, IPAB will perform an initial screening of each question and feedback. IPAB will assign a lead reviewer from within IPAB, and one from the appropriate technical branch, if necessary. The lead reviewer will forward a reply to the originator within 14 business days to acknowledge receipt of the form and to inform the originator of the Feedback Form tracking number. Similarly, NRC will acknowledge receipt of questions and feedback provided directly to the NRC from members of the public or from members of industry. This response will be in the form of written correspondence. All follow-up questions should be directed to the lead reviewer.

Differences in interpretation of the PI guidance between the inspector and the licensee are the only issues to be entered, via feedback form, into the PI feedback process. Issues involving technical differences should follow already established agency processes such as a task interface agreement, or a conference call with the NRR technical reviewer, the licensee, and regional staff.

09.02 Evaluation of Questions or Feedback

Issues that only require an explanation of the existing guidance will be promptly resolved. The lead reviewer will provide the originator with the explanation and the issue will be closed out in accordance with "Closure" (Section 09.05).

Questions or feedback that require modification to the guidance to clarify meaning or intent will be addressed in accordance with "Resolution of Questions and Feedback not Requiring a PI Change" (Section 09.03).

Questions or feedback in which the resolution would require a new PI or a change to an existing PI or threshold will be addressed in accordance with "Resolution of Questions and Feedback Requiring a PI Change" (Section 09.04) and subsequent steps.

09.03 Resolution of Questions or Feedback Not Requiring a PI Change

The following steps will be performed to resolve questions or feedback that do not require a PI or threshold change:

a. The ROP Working Group will review the question and develop a proposed response. DIRS staff will involve the regions and NRR technical staff when necessary in developing the response.

b. The issue will be discussed at a public meeting of the ROP Working Group to arrive at tentative approval of the question and its proposed response. Although it is desirable that tentative approval be achieved by the close of the meeting in which the issue is first discussed, this portion of the process is iterative and could take several working meetings. In the event NRC and its stakeholders are unable to reach alignment on the issue being discussed, the DIRS Director will make the final decision. Regardless of whether or not tentative approval is achieved by the conclusion of the meeting, NEI will enter the new FAQs into a log that contains draft FAQs and will provide a copy of the electronic file to the NRC. The NRC will make the FAQs available to the public, industry and other stakeholders on the ROP internal and external web pages.

c. Following tentative approval, the FAQ will be held for a waiting period – normally until the next regularly scheduled meeting – to allow a final opportunity for all stakeholders to review the proposed FAQ and provide any input. Stakeholders should forward any feedback that impacts the resolution of the issue to the assigned lead reviewer for resolution prior to the next scheduled public meeting. The schedule for upcoming meetings is posted on the ROP web-page.

d. At the conclusion of the waiting period, the ROP Working Group will consider any additional input and will issue its final conclusion. IPAB will then place the approved FAQ on the internal and external web pages and will notify appropriate internal stakeholders of the resolution. NEI will notify licensees of the updated FAQ.

e. NEI 99-02 will be updated periodically, as appropriate, to clarify the PI reporting guidance based on insights from the resolution of the FAQs.

09.04 Resolution of Question/Feedback Requiring A Change

Questions or feedback that raise issues which require more than clarification of reporting guidance or policy will be addressed as described below. Resolution may involve creating a new PI, changing an existing PI, changing a threshold for an existing PI, or changing an existing PI to reflect a unique plant design features. Each of the processes share common steps, but will be discussed separately.

Developing new PIs or making changes to existing PIs or thresholds can require significant NRC resources. Prior to expending those resources, the DIRS Director will determine whether the proposed change appears to be feasible and is therefore justified. For those changes that would clearly not be feasible, the DIRS Director will suspend consideration of the change and provide a response to the originator that includes a rationale for not proceeding. The issue will then be closed out.

If a change appears to be feasible, one of the four steps described below will be followed.

a. New PI

When an existing PI is ineffective, consistently generates many FAQs, or has the potential to be misleading or to create unintended consequences, there may be a need to develop a new PI. A proposed new PI should provide indication of licensee performance in the same cornerstone(s) as the existing PI.

Once the need for a new PI has been determined and the scope of the information the PI will cover has been identified, the ROP Working Group will propose a definition for the PI, including draft reporting criteria. NRC will consider previous lessons learned and any stakeholder feedback in developing the proposed definition. The proposed PI will be discussed at a public meeting of the ROP Working Group to develop a mutually agreed upon definition. The proposed PI will be made available to internal and external stakeholders for comment via the NRC ROP web site. Following the comment period, NRC and the Industry ROP Working Group will review the comments provided and make appropriate changes to the PI as necessary.

Early consideration should be given to the potential need for a revised OMB Clearance for the new PI to ensure clearance processing will not adversely impact final PI implementation.

Following the development of the final proposed PI definition and reporting guidance, the NRC must determine the efficacy of the PI. The PI must be benchmarked against past industry performance data to determine whether the results obtained from the PI would be indicative of current plant performance. If historical data are available, the ROP Working Group will collect the data to determine if the PI can identify declining performance in a timely manner so that increased regulatory attention can be applied before performance becomes unacceptable. In the event that historical data is not available, NRC and the Industry ROP Working Group will use the best information available.

If the proposed PI cannot identify declining performance in a timely manner, the PI must either be revised prior to proceeding or development efforts discontinued. Once the PI has been successfully benchmarked, the ROP Working Group will consider whether the PI will provide information that is not currently being collected and adds benefits commensurate with the reporting burden. In the event the PI does not provide information that would make its continued development and implementation beneficial, it must be revised or it will be discontinued.

The ROP Working Group will conduct a pilot test or a tabletop exercise using a representative sample of plants to collect data for the proposed PI, in addition to continuing to collect data on the existing PIs. The staff must obtain a new OMB clearance approval before the pilot testing can begin if the number of plants in the pilot exceeds nine. The purpose of this pilot or tabletop exercise is to conduct a real-time test of the proposed guidance, to establish thresholds, and to determine the effectiveness of the proposed PI. When the pilot or the tabletop exercise has been completed, NRC will provide an opportunity for the industry, public, and other stakeholders to provide feedback. This feedback, along with lessons learned from the pilot, will be evaluated by the staff and may be used to modify the proposed PI and/or its thresholds, as necessary.

In conjunction with adding a PI, NRC will consider whether changes to the baseline Inspection Program are warranted to eliminate potential overlap or ensure coverage of key attributes.

After the ROP Working Group has agreed on final changes to the proposed PI and thresholds, NEI will, in collaboration with the NRC staff, revise NEI 99-02 . IPAB will update the web page as appropriate to include the new PI data. The ROP Working Group may conduct training, as deemed necessary. IPAB will issue a Regulatory Information Summary (RIS) to inform stakeholders of the new PI and its reporting criteria. The RIS will also be placed in NRC's Public Document Room and on the external web-site at http://nrr10.nrc.gov/NRR/OVERSIGHT/ASSESS/INDEX.html, which can be accessed from the Inspection Manual of Agency Wide Applications. IP 71151 will be revised to reflect the new PI.

b. Changes To An Existing PI

The process for making a significant change to an existing PI is similar to creating a new PI. Like the initial steps in creating a new PI, NRC must ensure that the

revised PI will provide an indication of licensee performance in the key attributes of the cornerstone for which the existing PI was intended. The ROP Working Group will conduct public meetings with all stakeholders to discuss and reach agreement on the proposed change, including the PI definition and reporting criteria. The proposed change will be made available to internal and external stakeholders for comment via the NRC ROP web site. Following the comment period, NRC and NEI will review comments provided and make changes to the PI as appropriate. This process is iterative and allows all stakeholders an opportunity to contribute to the process.

Early consideration should be given to the need for a revised OMB Clearance for the modified PI to ensure clearance processing will not adversely impact final PI implementation.

If the proposed change is approved, the NRC and NEI will identify a representative sample of plants that are willing to pilot test the proposed change by collecting data for the modified PIs while continuing to provide data on the existing PIs. The staff must obtain a new OMB clearance approval before the pilot testing can begin if the number of plants in the pilot exceeds nine. The purpose of a pilot program is to conduct a real-time test of the proposed guidance, validate the thresholds, and ensure the effectiveness of the PI. When the pilot has been completed, NRC will provide an opportunity for the industry, public, and other stakeholders to provide feedback. This feedback, along with lessons learned from the pilot, may be used to modify the proposed PI as appropriate.

After the ROP Working Group has agreed on final changes to the PI, NEI will revise NEI 99-02 accordingly and IPAB will update the web page as appropriate to reflect the changes. The ROP Working Group may conduct training as deemed necessary. IPAB will issue a RIS to inform stakeholders of the PI change and approve the use of the new PI. The RIS will be placed in the NRC's Public Document Room and on its external web site at http://nrr10.nrc.gov/NRR/OVERSIGHT/ASSESS/INDEX.html, which can be accessed from the Inspection Manual of Agency Wide Applications. Additionally, IP 71151 will be revised to reflect the new PI.

c. Change In Threshold(s)

Thresholds may need to be adjusted based on lessons learned from experience with individual PIs. Such adjustments is are not intended to continually raise licensee performance expectations, but rather they are intended to ensure that the initial thresholds, some of which were established without the benefit of actual industry performance data, are performing as intended.

Once the need for a threshold change has been identified, the NRC and Industry ROP Working Group will meet in a public forum to discuss and reach agreement on the proposed threshold change. The proposed change will be made available to internal and external stakeholders for comment via the NRC ROP web site. Following the comment period, the ROP Working Group will review the comments in a public meeting. If the Working Group is unable to reach agreement on a new

threshold, the issue will be elevated to higher levels of NRC management to make the final decision.

IPAB will issue a RIS to inform stakeholders of the threshold change and will modify the web page accordingly. The RIS will provide guidance on when the revised threshold will become effective. The RIS will be forwarded to the regional Directors of Reactor Projects, Reactor Safety, and Plant Support; inspectors; and NEI. Additionally, the RIS will be placed in NRC's Public Document Room and on the external web-site, http://nrr10.nrc.gov/NRR/OVERSIGHT/ASSESS/INDEX.html., which can be accessed from the Inspection Manual of Agency Wide Applications.

d. Unique PI

With multiple reactor designs, plants may have unique design features that make compliance with the data reporting criteria established in NEI 99-02 impossible, impractical, or ineffective.

In such cases, the ROP Working Group will form a sub-group that includes representatives of the affected licensees to develop unique criteria to accommodate plant-type differences. If historical data are available, it will be collected and used in this effort. When historical data are unavailable, an expert panel will be assembled to identify appropriate thresholds based on experience. The NRC will then follow the remainder of the guidance outlined in Section C, Change In Threshold(s), to complete this process.

09.05 Closure. Once an issue has been resolved, the lead reviewer will notify the originator of the final response. This notification will normally occur via email and within 14 business days after NRC has reached a resolution. The completion date will be entered into the Feedback Form tracking system and the issue will closed out.

If a licensee disagrees with the resolution documented on a feedback form, the licensee should submit an FAQ to the ROP Working Group to present at the next ROP Working Group meeting. The FAQ process outlined in section 9.03 will be followed.

0608-10 PI REFERENCES

Management Directive 8.13, "Reactor Oversight Process"

SECY-99-007, "Recommendations For Reactor Oversight Process Improvements"

SECY-99-007A, "Recommendations For Reactor Oversight Process Improvements (Follow-up to SECY-99-007)"

SECY-00-049, "Results Of The Revised Reactor Oversight Process Pilot Program"

Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review"

Inspection Procedure 71151, “Performance Indicator Verification”

Inspection Procedure 71150, “Discrepant or Unreported Performance Indicator Data”

NEI 99-02, “Regulatory Assessment Performance Guideline,” (Revision 5)

Regulatory Information Summary 99-06, “Voluntary Submission Of Performance Indicator Data” (collecting and reporting historical data)

Regulatory Information Summary 2000-08, “Voluntary Submission Of Performance Indicator Data” (collecting and reporting data reflecting plant performance during full implementation of revised reactor oversight process)

General Statement of Policy and Procedure for NRC Enforcement Actions

Manual Chapter 0350, “Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational Concerns”

Web-site For Frequently Asked Questions:
http://NRR/OVERSIGHT/ACCESS/FAQs_by_pi_pdf

ROP Web-site: http://nrr10.nrc.gov/NRR/ROP_DIGITAL_CITY/ROP_digital_city.html

END

PERFORMANCE INDICATORS
Process for Addressing Questions and Feedback

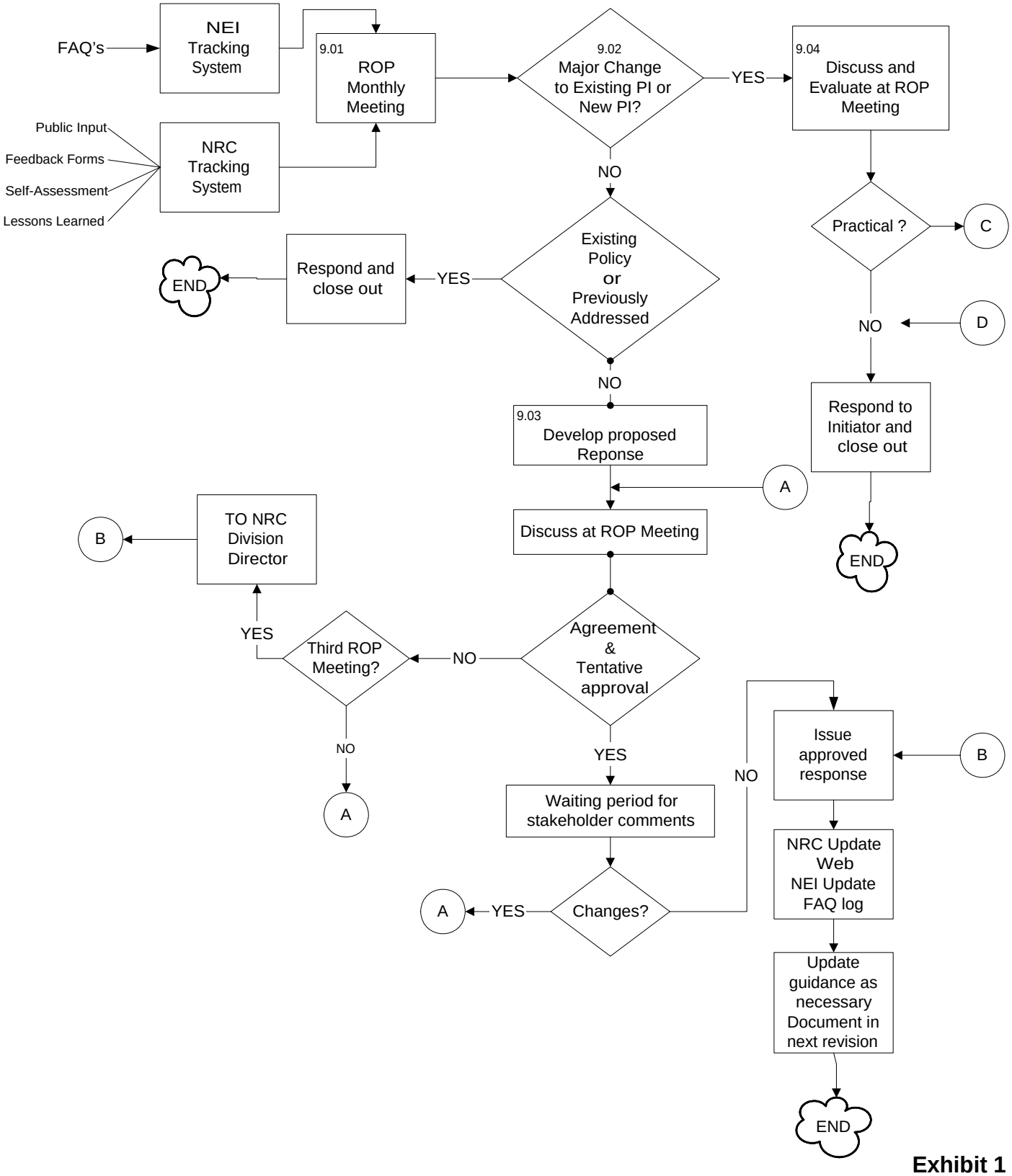

Exhibit 1
Part 1

PERFORMANCE INDICATORS
Process for Addressing Questions and Feedback (Continued)

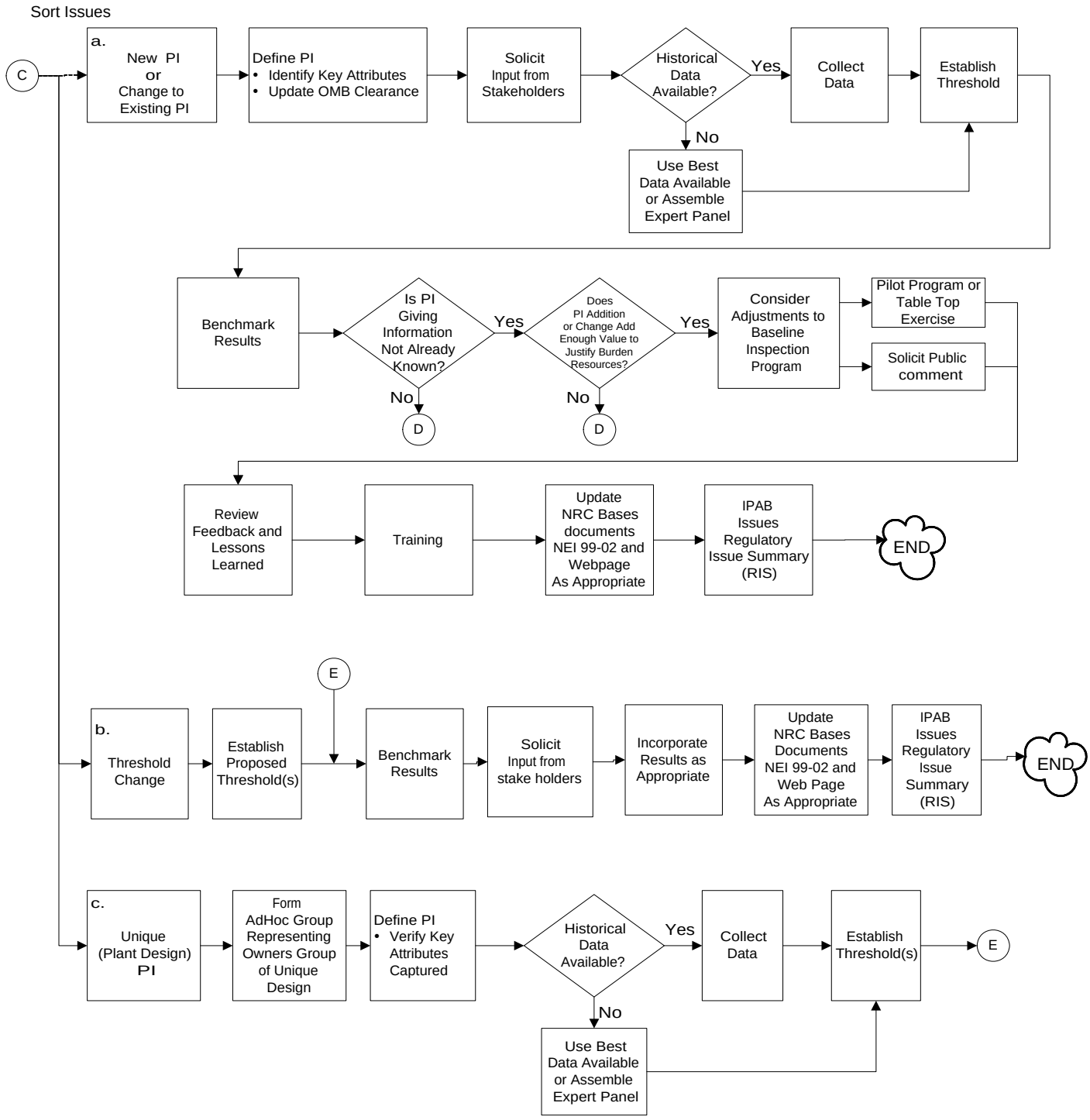

Exhibit 1 - Continued
Part 2

ATTACHMENT 1

Revision History for IMC 0608

Commitment Tracking Number	Issue Date	Description of Change	Training Required	Training Completion Date	Comment Resolution Accession Number
N/A	02/27/07 CN 07-007	IMC0608 Delete SSU, add MSPI; update flow charts; add definitions	None	N/A	N/A