

National Materials Program Pilot Project 3 Operating Experience Evaluation

Work Product Plan

Review Plan

The Working Group (WG) will focus on identifying enhancements to NRC and Agreement State (AS) processes for collecting, reviewing, analyzing, and disseminating concerns and lessons learned from operating experience. The WG will evaluate regulatory processes and methods to address the following questions:

1. How operating experience information can be better communicated between NRC and Agreement States?
2. How can operating experience information and trending optimize NRC and Agreement State resource utilization?
3. How can risk insights be better integrated into regulatory decision making?

Review Process, Evaluation Criteria, and Documentation

The WG will conduct reviews, interviews/surveys, and analyses to identify constraints, impediments, and efficiencies in existing regulatory processes:

- 7/03 Review pilot evaluation criteria in SECY-02-0074, reexamine periodically
- 7/03 Review regulatory guidance for evaluating operating experience information, including applicable items in Attachment A:
1. Domestic and foreign event data
 2. Major team inspections and special studies
 3. Generic reviews and/or generic communications
 4. Industry-wide analyses of performance and trends
 5. Insights and metrics amenable to risk-informed decision making
 6. Performance indicators and associated thresholds for increased regulatory attention

Emphasis on evaluating diverse perspectives of AS and NRC headquarters and regional roles and responsibilities

- 8/03 Conduct interviews with regulatory personnel to assess end-user decisions (inspectors, reviewers, managers):
1. Information needs and who needs to be informed

2. Regulatory decisions desired
 - a. Prompt regulatory action
 - b. Increased regulatory attention
 - c. Evaluation and handling of potential generic issues
 - d. Efficiencies through trending and potential leading indicators of change
 - e. Use of risk insights in decisions
 3. Communication practices, tools, and methods
 - a. Organizational interfaces
 - b. Data versus evaluation
 - c. Dissemination of insights and results
 - d. Licensee relocation across State/regional boundaries
 4. Impacts on resource allocation
 5. Feedback for guidance, licensing, guidance and rulemaking
 6. Successes and failures
- 8/03 Evaluate recommendations in incident or working group reports (e.g., Mallinkrodt Phase I Report, Schlumberger Augmented Inspection Team, St. Joseph Mercy Hospital, Davis-Besse Lessons Learned Task Force report, etc.). The WG should evaluate:
1. Safety issues including root causes, corrective actions, and actions to preclude reoccurrence
 2. Communication of emergent issues, generic issues, trends, and safety insights
 3. Use of information of event reports and information in NMED
 4. Licensee follow-up to generic communications
 5. Regulatory use of and follow-up to (e.g., use of temporary instructions) to generic communications, Generic Safety Issues, and IMPEP findings
 6. Use of risk information in regulatory decision making
- 9/03 Develop proposal for test case and criteria for evaluation. The WG should evaluate:
1. Candidate areas to test based on consequences (e.g., industrial radiography, intravascular brachytherapy, portable gauges, diagnostic nuclear medicine, etc.)
 2. Criteria using cumulative data, inspection insights, a standard format, and integrated decision making
 3. Regulatory decisions desired
 - a. Prompt regulatory action
 - b. Increased regulatory attention
 - c. Evaluation and handling of potential generic issues

- d. Efficiencies through trending and potential leading indicators of change
 - e. Use of risk insights in decisions
 - 4. Communication practices, tools, and methods
 - a. Organizational interfaces
 - b. Data versus evaluation
 - c. Dissemination of insights and results
 - d. Licensee relocation across State/regional boundaries
 - 5. Proposed process for providing information on significant nuclear materials issues and adverse licensee performance (NRC Strategic Plan and SECY-02-0216)
 - 6. Impacts on resource allocation
- 9/03 Evaluate and incorporate insights from NRR/RES Operating Experience Task Force, as appropriate
- 10/03 OAS meeting (Illinois)
- 1. Present status and test case
 - 2. Conduct poster session, if supported by other pilots
 - 3. Conduct survey to solicit feedback
- 10/03 ACMUI meeting on status/proposal, as appropriate
- 11/03 Develop draft framework proposal and associated recommendations for consideration by the NRC and Agreement States.
- 1. Propose enhancements to procedures, organizational review and evaluation methods, and sources of information
 - 2. Methods to better communicate operating experience information.
 - 3. Recommendations for enhanced efficiency and effectiveness of materials oversight programs, including matters related to duplication of effort and/or burden reduction
- 12/03 Solicit public comments on framework proposal/recommendations (e.g., electronic, FRN, etc.)
- 1/04 Reconcile comments. Complete draft pilot report
- 2/04 Public meeting on Pilots results and NMP direction (tentative)
- 3/03 Input/review progress report to the Commission
- 4/04 Complete final pilot project report. Submit for review/approval.

- 5/04 CRCPD meeting
- 6/04 Review and reconcile comments. Participate in development of draft Commission report.
- 8/04 Complete draft Commission report. Begin concurrence.
- 9/04 Pre-brief key NRC and Agreement State managers and reconcile comments.
- 11/04 Submit final report to Commission. Participate in briefing, as needed.

Level of Effort

Approximately two person-days per month will be required of participants. The Working Group Chair will require, on average, eight person-days per month for this effort. Actual Working Group travel should not exceed three meetings per year. Teleconferencing and video technology will be used to limit costs.

ATTACHMENT A
KEY REGULATORY GUIDANCE DOCUMENTS

1. Policy and Procedures Letter 1-57, "Generic Assessment Process"
2. Policy and Procedures Letter 1-80, "NMED Events: Searches, Certification, and Updates to the Monthly Licensing and Statistics Report and Budget Estimate and Performance Report"
3. NRC Inspection Manual Chapter, 2800, "Materials Inspection Program"
4. Temporary Instruction 2800/033 Revision 02, "Revised Materials Inspection Program"
5. SA-100, Implementation of the Integrated Materials Performance Evaluation Program"
6. SA-101, "Reviewing Common Performance Indicator #1, Status of Material Inspection Program"
7. SA-105, Reviewing Common Performance Indicator #5, Response to Incidents and Allegations"
8. SA-300, Reporting Materials Events"
9. Management Directive 6.4, "Generic Issues Program"
10. Management Directive 8.3, "NRC Incident Investigation Manual"
11. Management Directive 8.5, "Operational Safety Data Review"
12. Management Directive 8.10, "NRC Medical Event Assessment Program"
13. Management Directive 8.13, "Reactor Oversight Process"
14. Management Directive 8.14, "Agency Action Review Meeting"
15. NUREG-1614, "U.S. Nuclear Commission Strategic Plan"
16. NUREG/CR-6642, "Risk Analysis and Evaluation of Regulatory Options for Nuclear Byproduct Material Systems"
17. NUREG-1631, "Source Disconnects Resulting From Radiography Drive Cable Failures"

ATTACHMENT B
HISTORICAL DOCUMENTS AND PILOT PROJECT REVIEW CRITERIA

1. SECY-99-0250, "National Materials Program: Request Approval of the Formation of a Working Group on the Increase in the Number of Agreement States and Impacts on NRC Materials Program"
2. SECY-01-0112, "National Materials Program: Transmittal of Final Working Group report Presenting Options for a National Materials Program"
3. SECY-02-0074, "National Materials Program: Pilot Projects"
4. SECY-02-0107, "Addendum to SECY-02-0074, National Materials Program: Pilot Projects"
5. SECY-02-0216, "Proposed Process for Providing Information on Significant Nuclear Materials Issues and Adverse Licensee Performance"
6. SECY-03-0036, "Report to Congress on Abnormal Occurrences for Fiscal Year 2002"
7. SECY-03-0044, "Update of the Risk-Informed Regulation Implementation Plan"
8. Memorandum dated January 29, 2003, from P. Lohaus, STP, to J. Funches, CFO, K. Cyr, OGC, M. Virgilio, NMSS, H. Miller, RI, L. Reyes, RII, J. Dyer, RIII, E. Merschoff, RIV, Subject: Request for Working Group Members for National materials Program Pilot Projects
9. National Materials Program Pilot Project 3, Operating Experience Evaluation, Charter, March 2003
10. Nuclear Materials Events Database, Quarterly Reports
11. Memorandum dated January 3, 2003, from William D. Travers, EDO, to Chairman Meserve and Commissioners Dicus, Diaz, McGaffigan, and Merrifield, Subject: Senior Management's Review of the Davis-Besse Lessons Learned Task Force Report