POLICY ISSUE
INFORMATION

April 6, 2004 SECY-04-0053

FOR: The Commissioners

FROM: William D. Travers
Executive Director for Operations

SUBJECT: REACTOR OVERSIGHT PROCESS SELF-ASSESSMENT
FOR CALENDAR YEAR 2003

PURPOSE:

To present the results of the staff's annual self-assessment of the Reactor Oversight Process (ROP) for calendar year (CY) 2003.

SUMMARY:

The self-assessment results indicate that the ROP was generally effective in monitoring operating nuclear power plant activities and focusing U.S. Nuclear Regulatory Commission (NRC) resources on significant performance issues in CY 2003. The staff of the NRC maintained its focus on stakeholder involvement and continued to improve various aspects of the ROP as a result of feedback and lessons learned. In particular, the event at Davis-Besse Nuclear Power Station continues to cause a focused look at the NRC's oversight efforts and has resulted in several program improvements. The responses to the NRC's annual survey of external stakeholders, which solicited feedback on the ROP, were generally favorable; however, some stakeholders raised concerns about the complexity and subjectivity of the significance determination process (SDP), the effectiveness of the performance indicator (PI) program, a perceived lack of NRC responsiveness to stakeholder comments, and other areas where improvements have been suggested. All ROP self-assessment metrics were met, with the exception of one PI metric, two SDP metrics, and three overall metrics.

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As part of the self-assessment effort, the staff identified issues and actions in the key ROP program areas of PIs, inspection, SDP, and assessment. As a result of the increased concern from the staff and many stakeholders about the effectiveness of the PI program, the staff has taken measures to improve the frequently asked question (FAQ) process by which PI issues are addressed, and plans to continue its reassessment of the PI program in CY 2004. Although the staff completed the baseline inspection program in CY 2003, resource challenges continued. The staff believes that the revised resident inspector staffing policy and additional regional resources allocated in fiscal year (FY) 2004 and beyond will address the site staffing and resource concerns associated with the ROP. The staff continues to focus on improving SDP timeliness and has made significant progress in implementing the SDP Improvement Plan. The staff also made several improvements in the assessment program during CY 2003, while other suggested adjustments were evaluated but not incorporated.

Although significant progress has been made in CY 2003, the staff expects to make continued improvements to the ROP based on lessons learned and stakeholder feedback. The staff plans to continue to actively solicit input from the NRC's internal and external stakeholders, and will evaluate potential program improvements via the ongoing self-assessment process. The staff will also continue to report the results of its annual self-assessment as part of the Commission briefing following the Agency Action Review Meeting (AARM).

BACKGROUND:

On February 24, 2000, the staff issued SECY-00-0049, "Results of the Revised Reactor Oversight Process Pilot Program." The resultant Staff Requirements Memorandum (SRM), issued on March 28, 2000, approved initial implementation of the ROP as recommended by the staff. The initial implementation of the ROP began on April 2, 2000. In a followup SRM issued on May 17, 2000, the Commission directed the staff to report on the implementation of the ROP results after the first year of implementation. Following completion of the first year of implementation, the staff assessed the efficacy of the process and documented the results in SECY-01-0114, "Results of the Initial Implementation of the New Reactor Oversight Process," issued on June 25, 2001. SECY-01-0114 also noted the staff's intention to continue to perform an annual self-assessment of the ROP. Accordingly, on April 3, 2002, the staff issued SECY-02-0062, "Calendar Year 2001 Reactor Oversight Process Self-Assessment," to present the results of the second annual ROP self-assessment. The third annual self-assessment of the ROP was documented in SECY-03-0062, "Reactor Oversight Process Self-Assessment for Calendar Year 2002," dated April 21, 2003. This paper provides the results of the fourth annual self-assessment of the ROP.

This self-assessment was performed in accordance with Inspection Manual Chapter (IMC) 0307, "Reactor Oversight Process Self-Assessment Program." The data for this self-assessment were obtained from many diverse sources to ensure that a comprehensive and robust assessment was performed. Specifically, the data sources included the ROP self-assessment metrics described in IMC 0307; the ROP internal feedback process; recommendations from independent evaluations; comments from external stakeholders in response to a *Federal Register* notice (FRN); and feedback received from stakeholders at various meetings, workshops, and conferences. The staff also considered the direction and insight provided by the Commission through several SRMs.

DISCUSSION:

During the fourth year of ROP implementation (CY 2003), the staff conducted numerous activities to assess the effectiveness and efficiency of the ROP. The staff actively solicited input from our internal and external stakeholders and assessed aspects of the ROP's effectiveness using the self-assessment metrics described in IMC 0307. The staff analyzed the input to gain insights regarding the effectiveness of the ROP in supporting the NRC's performance goals of maintaining safety; enhancing public confidence; making regulatory activities more effective, efficient, and realistic; and reducing unnecessary regulatory burden. The self-assessment metrics also provide insights regarding the success of the ROP in fulfilling the regulatory principles of being predictable, understandable, objective, and risk-informed.

The staff continued to improve various aspects of the ROP in CY 2003 as a result of feedback from internal and external stakeholders and lessons learned. Based on the self-assessment metrics, stakeholder feedback, and other pertinent information, the ROP was generally effective in monitoring operating nuclear power plant activities and focusing the NRC's resources on significant performance issues in CY 2003. Accordingly, the staff believes that plants continue to receive the appropriate level of oversight commensurate with their performance. The staff will endeavor to make further improvements to the ROP in CY 2004.

The staff identified issues and needed actions in the key program areas of PIs, inspection, SDP, and assessment, as discussed in the following paragraphs. In addition, the staff has included discussions and assessments of ROP communication and training activities, ROP self-assessment and independent evaluations, industry performance trends, security and safeguards activities, ROP resources, and resident inspector demographics. The final section of this discussion contains the staff's overall conclusions concerning the ROP self-assessment. As noted in the pertinent sections of this paper, the staff has also included several attachments to provide additional detail to support the staff's assessment and conclusions.

ROP Program Area Self-Assessments

The staff performed assessments in each of the four key program areas of the ROP, including PIs, inspection, SDP, and assessment, as summarized below. Attachment 1 to this paper includes a more detailed discussion of each ROP program area, with regard to the actions taken in response to previous commitments, the results of the self-assessment, and actions planned to address the identified issues. In addition, Attachment 2 provides a consolidated listing and status of previous issues, and Attachment 3 presents the annual self-assessment of ROP performance metrics and analyses.

PI Program - During CY 2003, the staff continued to work closely with stakeholders to improve the voluntary PI program, most notably with the ongoing development and pilot testing of the Mitigating Systems Performance Index (MSPI) as a potential replacement for the safety system unavailability (SSU) PI. The staff completed the pilot test of the MSPI and addressed a number of technical issues that were identified. Although the pilot and evaluation efforts resulted in an MSPI that had certain advantages over the SSU PI, the disadvantages and unintended consequences were deemed significant and outweighed the potential improvements. Based on these disadvantages and unintended consequences, which included policy, technical, and

implementation issues, the staff recently announced that use of the MSPI in the ROP, as piloted, would not be pursued further. However, the staff plans to document the detailed concerns with the piloted MSPI and share them with all interested stakeholders. The staff will then conduct a public meeting on MSPI and request that interested stakeholders provide formal written comments and potential changes regarding MSPI. After further discussion on these issues, the staff will document the results of this effort and will make appropriate recommendations going forward.

Since the middle of CY 2002, the NRC/industry working group has been unable to resolve differences in interpretation of the Scrams with Loss of Normal Heat Removal PI, and the dilemma has resulted in a backlog of nine frequently asked questions (FAQs). This PI demonstrates the inability to resolve some PI questions in a timely manner, which has demonstrated that the FAQ process can be inefficient, ineffective, and overly burdensome. As a result, the staff adopted a policy that whenever the NRC and industry are unable to reach agreement on a particular issue after two meetings, the NRC will make the final determination. The staff expects to address several other indicators in CY 2004 in the reactor safety arena, including an improved reactor coolant system leakage PI to address (in part) the lessons learned from the Davis-Besse event.

All PI metrics were met in CY 2003, with the exception that the responders to the NRC's survey of external stakeholders believe that the current set of PIs does not minimize the potential for licensee actions that could adversely impact plant safety. Survey results indicated that many stakeholders continue to believe that the PIs are ineffective at identifying significant performance problems. In addition, the number of "non-green" PIs has declined significantly over the past several years, resulting in less information on plant performance outliers from the PI program. As a result, the staff plans to continue its reassessment of the PI program during CY 2004.

Inspection Program - The inspection program continued to improve during the fourth year of ROP implementation based on feedback and lessons learned. The staff implemented several changes to the inspection program to address recommendations from the Davis-Besse Lessons Learned Task Force (DBLLTF) and other stakeholders. In particular, these changes included significant revisions to inspection procedure (IP) 71152, "Problem Identification and Resolution (PI&R)," and IP 71111.05, "Fire Protection." In addition, the staff made minor adjustments to several other IPs regarding procedure scope, frequency, and level of effort as a result of the annual review of the inspection procedures, the survey results, and the feedback process. In addition, the staff has recently reviewed the effectiveness of its inspections in the engineering design area and has developed a proposed pilot inspection program to test the effectiveness of a newly developed inspection procedure. The details regarding the proposed revisions will be communicated to the Commission in a separate Commission paper that is currently under development. All inspection program self-assessment metrics met their criteria for CY 2003, including the inspection report audits, which were reinstated during this assessment period after being suspended in CY 2002 as a result of significant changes to IMC 0612, "Power Reactor Inspection Reports."

The regions completed the required baseline inspection program for CY 2003, although resource challenges continued and some regional offices needed assistance from inspectors

outside the regions. However, the staff anticipates that the revised resident inspector staffing policy and additional budgeted regional resources will address the resource challenges and improve site coverage during CYs 2004 and 2005. The staff also plans additional improvements for the inspection program to reflect lessons learned from the Davis-Besse event, as well as continuing feedback from the regions through their implementation of the ROP.

Significance Determination Process - The ongoing initiatives to improve SDP efficiency and effectiveness continued during this period. The staff maintained the SDP Improvement Plan to address key stakeholder recommendations, including those from the SDP Task Group, an audit by the Office of the Inspector General (OIG), and input from the internal and external feedback processes. The most significant of the Plan's objectives completed in CY 2003 was the benchmarking of all site-specific risk-informed inspection notebooks. Additional notebook enhancements are planned for CY 2004. The next significant step in the enhancement of the phase 2 process for reactor safety findings will be the development of the pre-solved Phase 2 tables, which is currently scheduled to be completed by the end of CY 2005.

The timeliness of final significance determinations improved in CY 2003, but again fell short of the established goal. The staff anticipates continued challenges in CY 2004 with SDP timeliness in certain areas, particularly for fire protection issues and for SDPs that involve complex engineering analyses. The second unsuccessful metric in this area resulted from the continued negative perception from numerous stakeholders that the SDP results do not translate to the same level of significance across all cornerstones. However, the metric measuring the accuracy of SDP results communicated to the public, which failed to meet its criteria for CY 2002, improved significantly in CY 2003 (zero inaccuracies) based on the staff's implementation of new procedures requiring multiple checks prior to posting findings to the NRC's external Web site. In addition, the concerns expressed by external and internal stakeholders regarding the fire protection and shutdown SDPs are resulting in significant changes to those processes. When issued, the two SDPs will incorporate major revisions and will require training of inspectors and senior reactor analysts.

Assessment Program - During CY 2003, the staff made several improvements in the assessment program, as reflected in revisions to IMC 0305, "Operating Reactor Assessment Program," and IMC 0350, "Oversight of Operating Reactor Facilities in a Shutdown Condition with Performance Problems." In particular, the staff revised the guidance in IMC 0305 to clarify what constitutes a substantive cross-cutting issue, to include the option to request that a licensee respond to substantive cross-cutting issues, to provide increased flexibility in the scheduling of annual public meetings, and to incorporate lessons learned from the previous mid-cycle and end-of-cycle review meetings. As a result of DBLLTF recommendations, the staff also revised IMC 0350 to include a comprehensive correlation between aspects of the ROP and the IMC 0350 process, to provide enhanced structure in the inspection approach for IMC 0350 plants, and to add an entry condition based on a significant operational event without first having established that a significant performance problem exists.

All of the performance metrics in the assessment area met their established criteria or goals in CY 2003. The staff performed a detailed analysis of the industry's recommendation to increase the threshold for a degraded cornerstone from two to three "white" inputs, and concluded that

the existing threshold of two white inputs was appropriate and no changes to the thresholds were planned. The staff also determined that the industry's recommendation to apply a graded approach for removing inspection findings from consideration in the assessment program (wherein white and yellow findings would be considered for 6 and 9 months, respectively, as opposed to a full year) was not warranted. In addition, as requested by the Commission in an SRM dated June 10, 2003, the staff performed a review of the appropriateness of the Action Matrix thresholds and recommends that no changes are necessary to the Action Matrix at this time. However, the staff will continue to assess the combination of inputs and length of time for consideration in the Action Matrix as part of its annual self-assessment, to ensure that the NRC's response to licensee performance remains appropriate.

ROP Communication and Training Activities

The staff effectively implemented the ROP Communication Plan in CY 2003 and continued to focus on stakeholder involvement. In particular, the staff pursued a variety of communication initiatives to ensure that all stakeholders have access to ROP information and results, and have an opportunity to provide feedback. The staff also continued to conduct monthly public meetings and workshops with external stakeholders, as well as biweekly telephone conferences and frequent meetings with internal stakeholders. In addition, the staff conducted a survey of external stakeholders and continued the ongoing internal feedback process to solicit and analyze stakeholder feedback regarding ROP effectiveness.

The responses from the survey of external stakeholders were similar in content to previous years, as were the number and distribution of the responses. Specifically, half of the 18 responses were from utilities, while 3 were from State agencies, 5 were from public interest groups, and 1 was from an anonymous NRC staff member. The staff also evaluated stakeholder comments from the Commission briefing on May 15, 2003, along with the FRN responses. The responses were generally positive, with concerns being raised specifically about SDP complexity and subjectivity, the effectiveness of the PI program, the NRC's responsiveness to stakeholder comments, and other perceived needed improvements to the ROP. The staff was surprised by the perceived unresponsiveness to stakeholder comments concerning ROP implementation, including those noted by the anonymous NRC staff member. The public outreach and stakeholder involvement in the decision making process during development and implementation of the ROP have both been unprecedented, and the staff continues to focus on stakeholder involvement. In addition, the staff implemented several initiatives to improve the effectiveness of the external survey and address the major comments in the annual self-assessment each year.

The staff also performed a detailed analysis in CY 2003 of the survey comments submitted by internal stakeholders during the biennial internal survey conducted in late 2002. Based on a review of the written comments, the staff identified several repetitive themes, resulting in 10 recommendations and the generation of several ROP feedback forms. Several program documents have been revised or are in the process of being revised to address the feedback, and the staff has already closed many of the resultant feedback forms. Staff analysis of the survey responses is included in the applicable portions of the program area discussions in Attachment 1, as well as in the ROP performance metric report in Attachment 3.

The staff also continued its efforts to improve the inspector training programs and techniques in CY 2003. In particular, the staff implemented a policy to provide training to inspectors prior to issuing new or significantly revised guidance, based on feedback from the 2002 internal survey. The staff also established a management steering group to provide a structured means for monitoring and maintaining inspector training and qualifications to ensure that qualified inspectors have the appropriate knowledge and skills. In addition, the staff developed and implemented a Web-based read-and-sign training initiative to provide effective and efficient training to all inspectors. In CY 2003, the staff developed and distributed three read-and-sign training courses to address specific DBLLTF recommendations. Initial feedback on this read-and-sign initiative is very favorable.

The staff continued to make improvements to the ROP Web pages to ensure that they remain useful tools for communicating accurate and timely ROP information to all stakeholders. In an effort to increase inspector efficiency, the staff also continued developing an electronic support system for inspectors, including an online inspector newsletter that has received positive feedback from inspectors. The staff also continued to explore and make available new technologies as useful tools for inspectors. In summary, the staff continues to seek and implement improvements to the ROP based on feedback and insights from all stakeholders. Attachment 4 provides more detailed discussions and analyses of several ROP communication and training activities.

ROP Self-Assessment and Independent Evaluations

The ROP Self-Assessment Program is detailed in IMC 0307, which the staff recently revised to further improve the efficiency and effectiveness of the program. Attachment 3 to this paper presents the annual self-assessment report of performance metrics. The majority of the metrics met their established criteria; however, some metrics in the PI and SDP program areas did not meet their criteria and required further analysis. In addition, the staff determined that three of the overall program metrics failed to meet the established criteria as a result of negative perceptions regarding whether the ROP is appropriately risk-informed, whether the NRC is responsive to stakeholder inputs and comments, and whether the ROP results in unintended consequences.

In addition to the ROP self-assessment program, several independent evaluations have been performed since the inception of the ROP to analyze its effectiveness and recommend improvements. The OIG, the Office of Management and Budget (OMB), the Advisory Committee on Reactor Safeguards (ACRS), the Davis-Besse Lessons Learned Task Force (DBLLTF), and the SDP Task Group have all performed evaluations related to the ROP. These evaluations have generally provided favorable results, but have also suggested potential areas of improvement for the staff to consider. Most recently, the OMB Program Assessment Rating Tool (PART) evaluation of the ROP resulted in a score of 89 percent, corresponding to an “Effective” rating of the management of the program — the highest rating possible under the PART system. Several recommendations by the DBLLTF and others are addressed throughout this paper. Attachment 5 provides more detailed discussion of the ROP self-assessment program and independent evaluations.

Industry Performance Trends

In addition to the PIs used to assess individual plant performance under the ROP, the NRC uses industry-level indicators to identify and evaluate adverse trends, and take appropriate actions. The staff continued to implement and further develop the Industry Trends Program (ITP) in CY 2003 as a means to confirm that the nuclear industry is maintaining the safety of operating power plants and to increase public confidence in the efficacy of the NRC's processes. The ITP continues to monitor the industry-level indicators originally developed by the former Office for Analysis and Evaluation of Operational Data (AEOD) and the Accident Sequence Precursor (ASP) Program implemented by the Office of Nuclear Regulatory Research (RES). One important output of the ITP is to report to Congress each year on the measure of "no statistically significant adverse industry trends in safety performance" as part of the NRC's Performance and Accountability Report. The results of the ITP, along with any actions taken or planned, have been reported to the Commission in an annual paper that complements this paper and will also be reviewed at the AARM.

Security and Safeguards Activities

The staff ensured the security and safeguards of reactor facilities in CY 2003 through implementation of the ROP within the Physical Protection cornerstone. The staff utilized Temporary Instruction 2515/148, "Inspection of Nuclear Reactor Safeguards Interim Compensatory Measures," along with portions of the ROP baseline inspection procedures to satisfy the baseline inspection program. The staff also issued IMC 2201, "Security and Safeguards Inspection Program for Commercial Reactors," to establish interim policy and guidance for the security and safeguards inspection of commercial power reactors. In addition, the staff revised and issued IP 71130 and its attachments for verification and assessment of licensee action with respect to (1) safeguard events, (2) recurring, non-routine safeguards activities, and (3) Commission initiatives deemed necessary to address the adequacy of the protection of public health and safety from the design-basis threat or changes thereto.

The staff is in the process of revising the Physical Protection SDP in light of the current threat environment, potential changes in the design-basis threat, and other considerations. A draft revision has been developed and is currently under review by internal stakeholders. The staff and industry also recognize the need to improve the physical protection PIs, but these efforts were put on hold and will be evaluated as part of the staff's ongoing security review.

The staff is currently evaluating various options for the treatment of physical protection issues under the ROP for CY 2004 and beyond. In making its determination and recommendation, the staff will need to carefully balance the goals of the ROP with the perception that plant-specific security information may reveal vulnerabilities to potential adversaries and terrorist attacks.

ROP Resources

In last year's self-assessment, the staff reported that it had experienced resource challenges in completing the inspection program during the CY 2002 inspection cycle and described the staff's responses to meet those challenges. Those challenges continued in CY 2003. In anticipation of the potential impacts, the staff took preemptive action in order to avoid any

adverse consequences. In CY 2003, the Office of Nuclear Reactor Regulation (NRR) and other staff contributed significant resources to assist two regions in successfully completing the baseline inspection program. This assistance impacted the staff's ability to complete some project work as scheduled, with delays in some personnel transfers and formal qualifications; however, it ensured completion of required baseline inspection procedures.

In order to address potential budget shortfalls and avoid inspection resource challenges in future years, the staff reevaluated the inspection resource needs in each of the four regions. As a result, the annual regional budget for operating reactor inspection activities for fiscal years (FYs) 2004–2006 was increased by approximately 15 full-time equivalent (FTE) positions over the FY 2003 budget, in part to provide additional resources for oversight of an IMC 0350 plant and to assist in post-supplemental inspection activities to verify licensees' improvement plans. The additional regional FTEs should alleviate resource challenges as these positions are staffed with fully qualified inspectors. The staff also revised the resident inspector policy to allow early assignment of new resident and senior resident inspectors to a site to minimize the frequency and length of site coverage gaps caused by resident inspector transfers. The new policy allows the regional administrator to assign a permanent resident inspector up to 12 months before the planned departure of the incumbent resident, and to assign senior residents up to 6 months before the planned departure of the incumbent senior resident. Attachment 6 provides a detailed discussion concerning ROP resource issues.

Resident Inspector Demographics

As the Commission requested in its SRM dated April 8, 1998, the staff developed metrics to monitor and trend resident inspector (RI) demographics and continues to report the data and analyses to the Commission on an annual basis. The 2003 RI demographics for "NRC time," "total resident time," "qualified total resident time," and "current site time" are below their 1999 values, reflecting a resident inspector population with reduced NRC experience. This decline is due principally to promotions and transfers within NRC of experienced resident inspectors and an influx of new hires. Importantly, many of the newly assigned resident inspectors had garnered substantial, relevant nuclear experience before joining the NRC. The 2003 demographics for senior resident inspectors (SRIs) have remained relatively stable in all areas since 1999, with the exception of relevant non-NRC experience, which has increased by 48 percent since 1999.

A comparison of this year's data with last year's data indicates a substantive increase in the hiring of new RIs. This is the largest increase since the staff first collected the data in 1994. This increase is a result of the turnover rate in SRIs during this period, which led to a number of new RIs entering the program as existing RIs moved up to fill the SRI positions. This indicates that SRIs are well-qualified for various jobs throughout the agency. Also, as indicated by the departure of only one RI and one SRI during this period, both as a result of retirement, inspectors are not leaving the program; rather they are being promoted or reassigned to positions within the agency and its regions. The staff believes that (1) the advancement within the agency of field-experienced inspectors is a healthy phenomenon, and (2) each of the demographic data sets will improve in 2004 and beyond as the influx of new RIs gain additional NRC experience.

In conclusion, the staff believes that the RI program continues to attract and retain quality staff, and the staff has no further recommendations for changing the RI program at this time. The staff will continue to monitor the RI demographics and report the data and recommendations to the Commission as part of this annual self-assessment. Attachment 7 presents a more detailed analysis of the 2003 RI demographics.

CONCLUSIONS:

The ROP was generally effective in monitoring operating nuclear power plant activities and focusing NRC resources on significant performance issues in CY 2003. The ROP continued to support the NRC's performance goals of maintaining safety; enhancing public confidence; making activities more effective, efficient, and realistic; and reducing unnecessary regulatory burden. The ROP also remained effective in meeting its program goals of being objective, risk-informed, understandable, and predictable. In addition, there were no statistically significant adverse trends identified in any industry-level performance indicators. However, the Davis-Besse event continues to cause a focused look at the NRC's oversight efforts and has resulted in several program improvements.

The staff maintained its focus on stakeholder involvement and continued to improve various aspects of the ROP as a result of feedback and lessons learned. Although the responses to the survey of external stakeholders were generally favorable, some stakeholders raised concerns about SDP complexity and subjectivity, the effectiveness of the PI program, the perceived lack of NRC responsiveness to stakeholder comments, and other perceived needed improvements to the ROP. In addition, most of the self-assessment metrics were met, with the exception of one PI metric, two SDP metrics, and three overall metrics. The staff continues to pursue improvements to address concerns in each of these areas.

Although significant progress has been made in CY 2003, the staff expects to make continued improvements to the ROP based on recommendations of the DBLLTF and other stakeholders. The staff also plans to continue to actively solicit input from the NRC's internal and external stakeholders in the interest of further improving the ROP, and will continue to evaluate program improvements via the ongoing self-assessment process. The staff will also continue to report the results of its annual self-assessment as part of the Commission briefing following the AARM.

RESOURCES:

This paper describes a number of program improvement activities. The resource requirements to develop and implement these improvements are a part of the overall ROP development and management effort and have been included in the budget requests through FY 2006. The current estimates are approximately 55 FTE and $1.0 million for FY 2005 and approximately 55 FTE and $1.1 million for FY 2006. These numbers include all NRR, RES, and regional efforts for ROP development, management, and performance assessment activities within the scope of the current budget requests.

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objections to its content.

The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections.

/RA William F. Kane Acting for/

William D. Travers
Executive Director
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Attachments:
1. ROP Program Area Assessments
2. Status of Previous Issues
3. ROP Performance Metrics
4. ROP Communication Activities
5. ROP Self-Assessment and Independent Evaluations
6. ROP Resource Analysis
7. Resident Inspector Demographics

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