



# **Assessment and Enforcement Program Development**

CAP Effectiveness Reviews

March 6, 2008



# Effectiveness Reviews

- CAP inspections will be conducted:
  - to review the program when a licensee is ready
  - to review implementation when a licensee notifies the NRC that sufficient CAP activity has occurred
- Sufficient CAP activity could include vendor and modular construction input
- Resident and other inspections will also be considered in formulating a decision



# Decision Process

- The decision on CAP effectiveness (positive, negative, or insufficient information) will be documented in the inspection report.
- A positive decision requires:
  - (1) an adequate program be in place;
  - (2) demonstration of adequate implementation; and
  - (3) no significant CAP issues.



# Significant Issues

- Significant issues are considered to be:
  1. Any Severity Level I, II, or III violation related to an area of the Corrective Action Program.
  2. Evaluating the role of substantive cross-cutting issues related to the Corrective Action Program.



# CAP Degradation

Sufficient degradation may result in the NRC reverting to issuing NOVs for all violations

- Any SL I or II issued against the CAP will be viewed as sufficient indication to revert to NOVs (also evaluating the role of substantive cross-cutting issues here).
- Decision to revert to NOVs will be documented in an assessment letter (bi-annual or quarterly).
- Following licensee corrective actions the effectiveness review process will be repeated.