



## **Construction Reactor Oversight Process (cROP) Update and IMC Changes**

**August 21, 2014**

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## Construction Reactor Oversight Process (cROP) Update

- cROP fully implemented on July 1, 2013
- cROP Calendar Year 2013 self-assessment completed; summarized in SECY Paper 2014-0049 issued on April 24, 2014
- Internal and external feedback has been mostly positive
- Feedback being addressed through Inspection Manual Chapter (IMC) and Inspection Procedure (IP) revisions
  - IMCs 2522, 0613, 2505, 2506
  - IPs 90002 and 90003



## **cROP CY 2013 Self-Assessment**

- Commission requires the staff to conduct a cROP self-assessment every year
- Conducted pursuant to the guidance in IMC 2522, “Construction Reactor Oversight Process Self-Assessment Program”
- CY 2013 results
  - The cROP met its program goals and achieved its intended outcomes
  - Ten of the 11 performance metrics for the cROP met established criteria
  - Missed metric involved internal processing of Technical Assistance Requests
- Minor change to IMC 2522 issued on July 28, 2014
  - Removed requirement to conduct annual internal and external surveys
  - Staff will use other methods to solicit feedback when surveys are not conducted



## IMC 0613 - Power Reactor Construction Inspection Reports

- Addressed Part 52 lessons learned report
  - Unresolved item resolution in a timely manner
- Appendix E, Minor Violations Example 26
  - Failure to perform a Part 21 or 50.55(e) evaluation
- Revised cross-cutting aspects (CCAs) to align with the safety culture common language attributes of NUREG-2165 and the Commission's safety culture policy statement
  - Changes in terminology and coding; no change to policy or process
  - Changes do not affect the process for applying CCAs or evaluation of substantive cross-cutting issues (SCCIs)
  - More substantive process changes will be considered as part of ROP enhancement project, particularly as related to the evaluation of SCCIs



## **IMC 2505 - Periodic Assessment of Construction Inspection Program Results**

- All changes related to common language initiative and standardizing assessment language with ROP terms and descriptions
- 2014 Mid-cycle assessment meetings were conducted using “old” CCAs
  - Mid-cycle letters will be signed out on September 3, 2014
- New cROP guidance documents will be issued by December 31, 2014
- 2014 End-of-cycle meetings to be conducted per revised guidance; all 2014 findings with “old” CCAs will be converted to “new” CCAs



## **IMC 2506 - Construction Reactor Oversight Process General Guidance and Basis Document**

- Added an exhibit with roles and responsibilities for HQs, Region II, and Licensees
- Added assessment program definitions (IMC 2506 contains all construction-related guidance document definitions)
- Modified the cROP framework to reflect new cross-cutting areas (Human Performance, Problem Identification and Resolution) and incorporate common language



## **Inspection Procedures 90002 and 90003**

- Procedures implemented as directed in the Construction Action Matrix
  - IP 90002 - Construction Degraded Performance Column Inspections
  - IP 90003 - Construction Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs or One Red Input
- Changes incorporate common language initiative and standardized language with IPs 95002 and 95003.



## Next Steps

- Issue mid-cycle assessment letters
- Update public web pages
- Issue procedure revisions
- Site visits in October; opportunity for licensees to provide feedback
- End-of-cycle reviews
- CY 2014 cROP self-assessment