

The staff should present the following ROP changes to the Commission for approval prior to implementation.

1. Changes to fundamental elements of the ROP framework (e.g., cornerstones, cross-cutting areas, assessment inputs);
2. Addition, deletion, or significant modification to adding or deleting oversight processes in their entirety (e.g., cross-cutting issues (CCI) process, significance determination process (SDP)~~supplemental inspections~~);<sup>1</sup>
3. ~~e~~C changes to ROP thresholds, including but not limited to (e.g., significance determination process (SDP) thresholds, and performance indicator (PI) thresholds);
4. ~~e~~C changes to the number of inputs needed to make column changes in the Action Matrix;
5. Addition, deletion, or significant revision of adding or deleting PIs;
6. ~~s~~S specific ROP-related safety culture activities beyond communication and education; ~~and~~
7. ~~Temporary Instructions requiring less than 80 hours of direct inspection effort.~~
8. Initiation of any pilot projects involving the items above;<sup>2</sup> ~~and~~
9. ~~i~~I tems specifically identified by the Commission.

The staff should notify the Commission of the following ROP changes prior to implementation using an appropriate method based on the urgency and complexity of the change, such as an

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<sup>1</sup> For the purpose of this criterion ~~these criteria~~, changes involving notable differences in the level of industry or NRC effort, garnering extensive stakeholder feedback, or impacting the publicly available outputs of the ROP should be considered “significant changes.”

<sup>2</sup> A “pilot” is any activity used to test a potential change to the ROP with a subset of licensees.

informational Commission paper, a Note to Commissioners' Assistants, or a briefing of Commission staff.

1. Significant changes<sup>3</sup> to the implementation of existing ROP programs (e.g., baseline and supplemental inspection procedures, ~~implementation of the CCI process, implementation of SDPs,~~ implementation of the assessment program);
2. ~~e~~C changes to definitions affecting the Action Matrix other than threshold changes;
3. ~~Addition, deletion, or significant revision of adding or deleting~~ baseline inspections; and
- ~~3.4.~~ Initiation and completion of Temporary Instructions requiring less than 80 hours of direct inspection effort.
- ~~4.5.~~ pilot program plans and results that involve licensee participation.

Staff may notify the Commission of other ROP changes of lesser significance (e.g., more routine changes to the baseline inspection procedures) after implementation using an appropriate method, ~~such as the annual ROP self-assessment Commission paper.~~

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<sup>3</sup> ~~For the purpose of this criterion, changes involving notable differences in the level of industry or NRC effort, garnering extensive stakeholder feedback, or impacting the publicly available outputs of the ROP should be considered "significant changes."~~