



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 13, 2025

MEMORANDUM TO: Philip McKenna, Deputy Director
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

FROM: Brian Benney, Reactor Operations Engineer *Brian Benney*
Generic Communications and Operating Experience Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS
BI-MONTHLY PUBLIC MEETING HELD ON JANUARY 29, 2025

On January 29, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force executives, senior industry executives, and external stakeholders to discuss the staff's progress on initiatives related to the ROP. The meeting notice and agenda are located at [ML25028A309](#).

ADVANCE Act Discussion

Section 507 of the Act requires the NRC to develop and submit to the appropriate committees of Congress a report that identifies specific improvements to the nuclear reactor and materials oversight and inspection programs carried out pursuant to the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.) that the Commission may implement to maximize the efficiency of such programs through, where appropriate, the use of risk-informed, performance-based procedures, expanded incorporation of information technologies, and staff training. Key language in Section 507 includes optimizing resource use, revising inspection planning, evaluating the cross-cutting issues program, and aligning resource allocation with safety significance and licensee performance.

During the meeting, security oversight and inspection was the primary focus of the ADVANCE Act discussion. The slides for the staff presentation are available at [ML25027A321](#).

The first discussion gave an update on potential revisions to the ROP and highlighted that the staff has begun work on items that can be implemented throughout calendar year 2025. The goal will be to conduct inspector training at the June 2025 regional inspector counterpart meetings for the revisions that will be effective on July 1, 2025, and at the December 2025 regional inspector counterpart meetings for the revisions that will be effective on January 1, 2026.

The security oversight presentation outlined specific initiatives and timelines under consideration for physical and cyber inspection by the Office of Nuclear Security and Incident Response (NSIR). Some of the initiatives that are being proposed to meet Section 507 requirements, include revising the frequency for security inspection procedures, conducting a risk-informed evaluation of all of the security baseline inspection requirements to validate prioritization, developing a standardized inspection schedule and standardized request for information (RFI), reviewing the language in Inspection Manual Chapter 0612 for Very Low Safety Significance Issue Resolution (VLSSIR) to add clarity for security related issues, implement COMSECY 19-006 to reduce the number of force-on-force (FOF) exercises from two NRC conducted exercises to one exercise, revise the Baseline Security Significance Determination Process (BSSDP), and enhance the security issues forum process.

NEI provided a presentation on initiatives for the NRC to consider. The slides for the industry presentation can be found at [ML25024A177](#). There were some common initiatives brought forward by both the NRC and NEI. Some of initiatives that NEI proposed include, optimizing the use of fleet-level inspections, optimize a standard RFI, credit existing performance indicators for inspection frequency efficiencies, re-allocate inspection resources to gain efficiencies, eliminate duplicative inspection requirements, revise the cybersecurity inspection program, eliminate blind testing submittals, redefine the minor/more-than-minor threshold, revise the BSSDP, optimize qualification for armed responders, credit licensee performance during FOF, and augment urine testing with oral fluid testing.

NEI encouraged the NRC staff to consider reviewing all initiatives to prioritize those that can be implemented sooner given process and resource constraints.

Differing Professional Views and Opinions Process

The NRC's Office of Enforcement (OE) discussed potential updates to the Differing Professional Views and Opinions (DVP) process as part of the agency's implementation of the ADVANCE Act. This effort aims to ensure that differing views with potential impacts on agency decisions or schedules are evaluated based on their safety significance, in alignment with the ADVANCE Act's requirements.

As part of this effort, staff is evaluating and developing ways to:

- Strengthen the consideration of safety significance within the DVP process.
- Implement a tiered screening system to categorize concerns based on safety significance.
- Identify critical factors for assessing the safety impact of differing views.

In addition to input received at this public meeting and the September 26, 2024, Federal Register Notice solicitation ([89 FR 78916](#)), staff has reviewed processes by other agencies, collected internal agency feedback, and reviewed program assessments and stakeholder comments. The NRC remains committed to continuously improving the DVP process to ensure concerns are addressed in a manner that is transparent, efficient, and proportional to their safety significance.

NEI offered to participate in additional public interactions to further refine the proposed enhancements, which staff will take into consideration as part of the development process.

Emergency Response Facility and Equipment Readiness - Performance Indicator (ERFER PI)

NRC staff provided clarification as to the intent of the ERFER-PI as approved by the Commission via SECY-23-0010. The intent of this PI is to provide a measure of the effectiveness of licensee EP staff in maintaining facilities and equipment necessary for effective implementation of the emergency plan. It is not intended to provide a measure of the effectiveness of how other licensee programs maintain other equipment necessary for emergency response; this is addressed in other areas of the ROP. The ROP was developed with the intent to have a PI for measuring EP staff effectiveness at being responsible for maintenance activities. The maintenance activities initially considered were those related to fixed sirens or for equipment and facilities necessary for emergency response. Siren maintenance (availability) was initially chosen for implementation of the ANS-PI within the EP Cornerstone of the ROP. However, with the retirement of the ANS-PI due to increased implementation of non-siren based ANS designs, the implementation of the ERFER-PI provides consistency with the overall intent of the ROP as initially developed. The ERFER-PI is intended to provide a measure for how licensee EP staff maintain the equipment within the emergency response facilities necessary to implement the risk-significant planning standards (RSPS), i.e., the technical support center (TSC) and emergency operating facility (EOF).

NRC staff provided a positive operating experience brief related to how the Edwin Hatch nuclear power plant emergency preparedness staff maintained Alert and Notification System (ANS) operability during, and immediately after, Hurricane Helene.

The Next ROP Meeting

The next ROP bi-monthly public meeting is tentatively scheduled for March 26, 2025.

Communicating with the NRC Staff

At the start of all ROP public meetings, the project manager provides contact information for the public to use to provide their name and affiliation as a participant in the meeting. This contact information is also provided for submitting questions and comments to the NRC staff. Please note that any questions and/or comments pertaining to the ROP can be sent to Mr. Brian Benney at Brian.Benney@nrc.gov. The "Contact Us about ROP" page on the ROP public website can also be used to submit questions and comments regarding the ROP (<https://www.nrc.gov/reactors/operating/oversight/contactus.html>).

Conclusion

The industry representatives expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views. The NRC management stressed the importance of the NRC being focused on providing reasonable assurance of public health and safety when considering changes to the ROP.

The enclosure provides the attendance list for this meeting.

Enclosure:
As stated

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC
MEETING HELD ON JANUARY 29, 2025 - DATED FEBRUARY 13, 2025

ADAMS Accession No.: ML25044A137

***via email**

OFFICE	NRR/DRO/IOEB/BC	NRR/DRO/IRAB/BC	NRR/DRO/DD
NAME	BBenney	DAird	PMcKenna
DATE	2/11/2025	2/13/2025	2/13/2025

OFFICIAL RECORD COPY

LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC MEETING

January 29, 2025 - 9:00 AM to 11:30 AM

NAME	Organization ¹
Aaron McCraw	NRC
Abiola Oshunleti	NRC
Alan Konkai	NRC
Alex Prada	NRC
Alexandra Terres	NRC
Alonzo McSwain	Unknown
Amar Patel	NRC
Amy Chamberlain	Southern Nuclear
Anderson Wolfe	NRC
Andrew Mauer	NEI
Andrew Zach	EPW
Andy Rosebrook	NRC
Audrey Christiano	NRC
Avinash Jaigobind	NRC
Balla Barro	NRC
Bill Rautzen	NRC
Brian Benney	NRC
Brian Stander	Unknown
Bridget Curran	NRC
Carlos Sisco	Winston and Strawn
Caty Nolan	NRC
Cesar Castro	Unknown
César Castro Rendón	Unknown
Charles Murray	NRC
Chris Newton	Unknown
Christian Henckel	NRC
Christian Williams	Constellation Nuclear
Cindy Rosales-Cooper	NRC
Dan Geary	NRC
Daniel Daszkiewicz	NRC
Daniel Merzke	NRC
Dariusz Szwarc	NRC
David Aird	NRC

¹ Unknown organization indicates that the participant's affiliation was not provided by the issuance of this meeting summary.

David Bradfield	NRC
David Garmon	NRC
David Hills	NRC
David Hostetter	NRC
Deann Raleigh	Curtiss-Wright
Don Johnson	NRC
Don Wong	NRC
Dwayne Myal	NRC
Edwin Lyman	UCS
Eric Bowman	NRC
Eric Brothman	NRC
Gabe Taylor	NRC
Gary Purdy	NRC
Gerald Glen Durham Jr	Unknown
Gladys Firgeroa-Toledo	NRC
Grace Spaulding	NRC
Gregory Suber	NRC
Harrison Ngo	NRC
Helen Levendosky	AEP
Ijaz Hafeez	Unknown
Jack Bell	NRC
Jan Boudart	Unknown
Jason Lising	NRC
Jay Bodnar	Unknown
Jeanette Arce	NRC
Jeff Bream	NRC
Jefferson Clark	NRC
Jeremiah Rey	NRC
Jeremy Wachutka	NRC
Jesse Brown	Constellation Nuclear
Jesse Rollins	NRC
John Cherubini	Unknown
John Giddens	Entergy
John Jarrell	Unknown
John Lupoe	Unknown
John McKirgan	NRC
John Robbins	NRC
Johnathan Zeitz	State of New Jersey
Jon Robb	NRC
Josh Rhodes	NRC
Joshua Berry	NRC

Joylynn Quinones-Navarro	NRC
June Cai	NRC
Justin Knowles	Constellation Nuclear
Kara Smith	NRC
Kenneth Hussar	NRC
Kobe Oley	NRC
Larry Nicholson	Certrec Corporation
Maddie Blalock	EPW
Marc Ferdas	NRC
Mario Fernandez	NRC
Michael Whitlock	Dominion Energy
Michael Wilt	Unknown
Michelle Sutherland	NRC
Mike Annon	Unknown
Nicholas Taylor	NRC
Nicole Good	STARS Alliance
Noah Bolling	NRC
Odunayo Ayegbusi	NRC
Philip McKenna	NRC
Phillip Ollis	Unknown
Rebecca Sigmon	NRC
Robbin Ritzman	Curtiss-Wright
Roland Womack	NRC
Roy Linthicum	Constellation Nuclear
Russell Felts	NRC
Russell Thompson	TVA
Sailesh Thapa	NRC
Samir Darbali	NRC
Sarah Ramos	Constellation Nuclear
Stephen Campbell	NRC
Stephenie Pyle	Entergy
Steven Orth	NRC
Steven Roberts	NRC
Susan Perkins	Unknown
Suzanne Loyd	Constellation Nuclear
Tara Inverso	NRC
Thomas Hipschman	NRC
Vince Williams	NRC