

# BRIEFING ON CONSTRUCTION REACTOR OVERSIGHT PROCESS

December 16, 2010

Mark McBurnett

Vice President,

Oversight and Regulatory Affairs

STP Nuclear Operating Company

# Experience With Traditional Enforcement

- Six Level IV violations in past two years
- Legitimate non compliances
- Relatively inconsequential matters
- Minor or at worst Non-Cited under Reactor Oversight Process (ROP)
- Mixed message
  - Public is accustomed to ROP

# Pilot/Implementation of cROP

- Support Option 3 and recommend:
  - Pilot process on both licensees and applicants
  - No parallel traditional enforcement
  - Use pilot to check corrective action programs
- Multiple programs confuses stakeholders
  - Current experience is with ROP
  - Avoid mixed messages

# Transition from cROP to ROP

- Recommend development of a transition plan
  - ROP is based on mature plant data
  - Initial operation of new plant will likely not perform as a mature plant
  - Potential for inappropriate indicators and classification of findings
- A transition plan should provide for
  - Appropriate NRC response
  - Clear communications

# Conclusion

We strongly support the cROP process and consider the dialog successful to date and urge the Commission to endorse the SECY with Option 3 and move expeditiously to implementation