POLICY ISSUE
(Notation Vote)

August 28, 2015 SECY-15-0108

FOR: The Commissioners

FROM: Mark A. Satorius
Executive Director for Operations

SUBJECT: RECOMMENDATION TO REVISE THE DEFINITION OF DEGRADED CORNERSTONE AS USED IN THE REACTOR OVERSIGHT PROCESS

PURPOSE:

The purpose of this paper is to request Commission approval to revise the definition of degraded cornerstone as used in the Reactor Oversight Process (ROP) Action Matrix. This paper does not address any new commitments or resource implications.

SUMMARY:

Consistent with the staff's ROP Enhancement Project, and as recommended by the ROP Independent Assessment completed in 2014, the staff reviewed the criteria for a licensee to transition to the Degraded Cornerstone column (i.e., Column 3) of the Action Matrix. This review focused on whether two White inputs were appropriately indicative of a degraded cornerstone. The current technical basis for the criterion of two White inputs in the same cornerstone is not well defined or documented. As such, the staff conducted a risk-informed evaluation of the criterion using probabilistic risk assessment (PRA) for the applicable ROP cornerstones and concluded that three White inputs in the same cornerstone is more indicative of a degraded cornerstone. The staff also completed a qualitative review for the more deterministic ROP cornerstones and concluded that three White inputs in these cornerstones is more indicative of a degraded cornerstone. While there are both pros and cons regarding the need to revise the definition of a degraded cornerstone, the staff carefully considered all aspects of the matter and recommends that the definition of degraded cornerstone be revised from

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two to three White inputs in the same cornerstone. This change would impact the entry criteria for Column 3 and Column 4 of the Action Matrix. If approved, the staff plans to also revise Inspection Procedure (IP) 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area," to review licensee common cause analyses completed as a result of two White inputs in the same cornerstone. Given the potential for programmatic weaknesses that may be revealed by two White inputs in the same cornerstone, this revision would increase the likelihood of the U.S. Nuclear Regulatory Commission (NRC) identifying potentially broader licensee performance issues. The staff intends to assess the efficacy of this and other changes being implemented to the ROP as part of the annual self-assessment process and to make adjustments as necessary.

BACKGROUND:

The current ROP was implemented for all licensees in calendar year 2000. The ROP is continuously evaluated, and each year the staff documents its self-assessment of all of the major areas of the ROP. Aspects of the ROP have also been assessed several times by the Office of the Inspector General, the Government Accountability Office, and most recently by a Commission-directed independent review panel. Each report has concluded that the ROP is working well. These reports have also included recommendations that the staff has evaluated and implemented, as appropriate. The ROP is a mature and effective program.

The ROP consists of three strategic performance areas: (1) reactor safety, (2) radiation safety, and (3) safeguards. Within these strategic performance areas are seven cornerstones of safety: (1) initiating events (IE), (2) mitigating systems (MS), (3) barrier integrity (BI), (4) emergency preparedness (EP), (5) occupational radiation safety, (6) public radiation safety, and (7) security. PRA models are used to inform the determination of the safety significance of inspection findings in the IE, MS, and BI cornerstones. The safety significance of inspection findings under the other cornerstones, while risk-informed, is conducted using more deterministic methods.

Under the ROP, licensee performance determines predictable regulatory actions as described by the Action Matrix. According to Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15089A315), licensees with one White input into the Action Matrix, or two White inputs in a strategic performance area (not in the same cornerstone) are placed in Column 2, the "Regulatory Response" column. An input is either an inspection finding as determined by NRC inspectors, or a performance indicator (PI) reported by NRC licensees. The established regulatory action for Column 2 includes the conduct of an inspection under IP 95001, which has a resource estimate of approximately 40 hours.

The current criteria for licensee transition to Column 3 of the Action Matrix (i.e., the "Degraded Cornerstone" Column) includes one Yellow input, two White inputs in the same cornerstone, or three White inputs in the same strategic performance area. A degraded cornerstone is currently defined in IMC 0305 to be a cornerstone that has two or more White inputs or one Yellow input. Licensees in Column 3 are subject to inspections per IP 95002, "Supplemental Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area." White inspection findings are characterized as "low-to-moderate" safety significance, and Yellow findings are characterized as "substantial" safety significance. The resource estimate for the conduct of an IP 95002 supplemental inspection is approximately 200 hours.

In 2003, the staff performed an evaluation of the threshold for entering Column 3 (ADAMS Accession No. ML031900342). At that time, the staff concluded that reasoned judgement was used to support its decision to use two White inputs in the same cornerstone as part of the criteria for defining a degraded cornerstone. The staff noted that while a detailed analysis or evaluation was not developed to support this decision, staff did not identify data that suggested that the criterion was inappropriate. The evaluation also noted that the Action Matrix thresholds would continue to be assessed as additional experience with ROP implementation was gained.

In November 2013 the NRC staff held a public meeting to establish the scope of the assessment portion of the ROP Enhancement Project. The meeting summary, dated December 5, 2013, can be found at ADAMS Accession No. ML13337A637. The goal of the ROP Enhancement Project was to take a fresh look at the ROP to determine what was working well, and what needed improvement. During that meeting, industry representatives raised the concern that there are very significant resource implications for licensees when they transition from Column 2 to Column 3 in the Action Matrix. Industry representatives said the risk associated with two White inputs in the same cornerstone was not commensurate with the costs associated with the regulatory actions for Column 3 (i.e., unnecessary regulatory burden).

The Nuclear Energy Institute (NEI) subsequently submitted a position paper to NRC staff, dated August 18, 2014 (ADAMS Accession No. ML14246A465), reiterating the industry's position that the threshold for transitioning to Column 3 of the ROP Action Matrix (two White findings in a cornerstone) is too low. NEI stated that this threshold motivates licensees to challenge "preliminary White" findings aggressively. As a result, both licensees and the NRC often expend resources on White findings that are not commensurate with their low-to-moderate safety significance.

In the Staff Requirements Memorandum (SRM) on SECY-12-0081, "Risk-Informed Regulatory Framework for New Reactors," dated October 22, 2012 (ADAMS Accession No. ML12296A158), the Commission stated it would benefit from a fresh review of the practices and approaches the staff has developed for the ROP over the course of its years. Specifically, the Commission directed the staff to conduct an independent review of the program's objectives and implementation, including the relative roles of headquarters and regional staff, interactions with industry over PI assessments, and the effectiveness of NRC's assessment of substantive cross-cutting issues. In February 2014, the NRC review team issued the Reactor Oversight Process Independent Assessment Report (ADAMS Accession No. ML14035A571). Recommendation 5 of the report stated:

> The NRC should review the criteria for transition to Column 3 of the NRC Action Matrix against the original ROP program goals to ensure that the significance of White inspection findings is not being overemphasized and to ensure that agency resources used to process White inspection findings are commensurate with findings that, by definition, are of low to moderate safety significance.

DISCUSSION:

Working Group Evaluation

Following receipt of feedback from external stakeholders and the recommendation from the ROP Independent Assessment, the NRC staff formed a working group to evaluate the criteria for licensee transition to Column 3 of the Action Matrix. The purpose of this review was to determine if the existing criteria, and specifically the definition of two White inputs in the same cornerstone, were appropriate or if a change was warranted. Note that the ROP Independent Assessment also recommended a review of agency resources used to process White findings; this evaluation was not performed by the working group. In response to SRM-COMSECY-14-0030, "Proposed Suspension of the Reactor Oversight Process Self-Assessment for Calendar Year 2014," dated September 19, 2014 (ADAMS Accession No. ML14262A078), separate, ongoing staff efforts to improve the efficiency and effectiveness of the ROP significance determination process (SDP) are being implemented to ensure agency resources used to process White inspection findings are commensurate with their significance. The staff response to this tasking was provided to the Commission in June 2015.

As described in IMC 0305, licensees in Column 3 are considered to have met all cornerstone objectives with a "moderate degradation" in safety performance. The working group completed an extensive review of the history and the basis for the current criteria and determined that there was no documented technical basis for the definition of two White inputs in the same cornerstone being a degraded cornerstone. The working group interviewed several founding members of the current ROP who said the staff considered a range of values for the criterion of the number of White inputs in the same cornerstone necessary for transition to Column 3 of the Action Matrix. Ultimately, an expert panel made a conservative decision to set the threshold for degraded cornerstone at two White inputs in the same cornerstone.

Risk Analysis

Though not explicitly stated, the current IMC 0305 criteria infer that two White inputs in the same cornerstone are equivalent to one Yellow input, indicative of a moderate degradation in safety performance. When the ROP was developed, the Advisory Committee on Reactor Safeguards commented that "the staff's judgment is that two White inputs signify a certain degradation in performance which is about the same as that corresponding to one Yellow finding in the sense that the resulting regulatory response should be the same." The staff responded to this comment in a letter, dated January 10, 2002 (ADAMS Accession No. ML013550087), and stated,

> Consideration was also given to the fact that any White finding could have a delta CDF [change in core damage frequency] that was almost Green (e.g., 1.1E-06) or almost Yellow (9.9E-06) and that an appropriate risk-based response would be complicated when combining multiple White issues. The group determined that it would be inappropriate to attempt to quantitatively define the agency's response when considering these uncertainties.

That expert panel also recognized there was considerable uncertainty in determining risk significance of findings, particularly if complicated by multiple simultaneous findings. However, after 15 years of implementation, a significant amount of historical PRA data now exists that

was not available to the framers of the ROP. The working group analyzed the historical data to determine how many White inputs are equivalent to one Yellow input using PRA information.

The working group noted that there is considerable uncertainty in every significance determination that relies on PRA models. Using a mean delta CDF for a White finding of 5E-06/year, the sum of two White findings would characterize licensee performance at the White/Yellow threshold (1.0E-05). Yellow risk is a delta CDF greater than 1.0E-05. A third White finding would push the overall risk into the very low end of the risk band associated with Yellow, or Column 3 of the Action Matrix. The working group noted that similar arguments could be raised for transitions to other columns, such as the number of Green findings equivalent to one White input or the number of Yellow inputs equivalent to one Red input. However, the argument does not apply to Green findings because it was decided not to aggregate Green findings when the ROP was formed because of the much wider Green risk range (several orders of magnitude). In addition, since Yellow inputs are defined to be of substantial safety significance, and are relatively rare, the working group determined that the current criteria of two Yellow inputs or one Red input for transition to Column 4 are appropriate. The staff will continue to assess the Action Matrix criteria as part of its annual ROP self-assessment to determine if any additional changes should be considered.

Because inputs into the Action Matrix include both inspection findings (processed using the SDP) and PIs (with risk-informed performance thresholds), the working group also reviewed the risk significance of White PIs to ensure their significance was consistent with the significance of White inspection findings. To illustrate, for the MS cornerstone, the primary PIs are the Mitigating Systems Performance Index (MSPI) indicators. The MSPI indicators monitor safety system unavailability and unreliability over time, which translates to a delta CDF. The thresholds for these PIs were established to be equivalent to the risk significance of inspection findings. The working group concluded that the safety significance associated with White PIs is equivalent to the safety significance of White inspection findings (and therefore the regulatory actions for each should also be approximately equivalent).

The working group also reviewed the final SDP results for licensees that transitioned to Column 3 based on two White inspection findings in the same cornerstone, or one White inspection finding and one White PI in the same cornerstone, to validate the PRA results. The working group concluded that none of the licensees that were reviewed exceeded the White/Yellow threshold when summing the final SDP results. Because the sample size was small, the working group also reviewed the SDP results for all White findings from 2011 through 2014. This period provided a statistically-significant sample. Twenty-one White findings were issued during that period for which the actual mean delta CDF was 4.4E-06/year. The working group determined that the median delta CDF was 4.0E-06/year, indicating that the majority of findings were below the mean. Because the actual mean was lower than the assumed mean, the results support the conclusion that three White inputs are more equivalent to one Yellow input (vice two as currently defined in IMC 0305).

Qualitative Analysis

The preceding PRA discussion applies to the three cornerstones of safety that most directly rely on quantitative risk assessment (IE, MS, BI) for determining significance of findings and PIs. For completeness, a more qualitative assessment was needed for the other cornerstones, which include EP, Public Radiation Safety, Occupational Radiation Safety, and Security. Since the

inception of the ROP, there have been 31 plants that transitioned to Column 3 based on two White inputs alone. Twenty-six of the 31 licensees that transitioned to Column 3 because of two White inputs did so as a result of their performance in the more quantitative cornerstones. The remaining 5 of 31 licensees transitioned to Column 3 under the more deterministic cornerstones. Six of the 31 plants would have eventually transitioned to Column 3 using the current criteria, either because of additional White findings in the same strategic performance area or a Yellow input.

To determine if a licensee's actual performance was consistent with the description of the performance degradation associated with Column 3 of the Action Matrix, the working group completed a review of the resulting IP 95002 supplemental inspection reports from the past 10 years (notably the same period of time used to evaluate industry-wide performance trends in the Industry Trends Program) for those plants that transitioned to Column 3 based only on two White inputs.

The working group recognized that there is considerable subjectivity associated with making a determination that a plant had a moderate degradation in safety performance based solely on the documentation supplied in the NRC's supplemental inspection reports. Therefore, the working group developed criteria from which to make an informed assessment. Those criteria included whether significant programmatic weaknesses were identified from licensee root cause evaluations and whether extent-of-condition reviews identified other systems and components similarly degraded because of the root cause. The working group judged that significant programmatic weaknesses identified by licensee root cause evaluations *could* be an indicator of pervasive performance problems affecting one or more cornerstones. In addition to the above criteria, the working group considered whether the programmatic deficiencies identified in the inspection reports could have been adequately reviewed through another inspection other than the IP 95002 inspection (e.g., IP 71152, "Problem Identification and Resolution (PI&R)" (ADAMS Accession No. ML14316A042)), or IP 95001. An important contributor to improving licensee performance is for the licensee to self-identify those weaknesses and implement corrective actions to eliminate them. Licensee root cause evaluations and corrective actions are developed for all inspection findings with greater-than-Green significance, regardless of the type of supplemental inspection conducted by the NRC.

From the IP 95002 inspection report review, the working group concluded that for most licensees, there was insufficient documented evidence of the existence of significant programmatic weaknesses to support a conclusion that the licensee's performance was consistent with the description of the performance degradation associated with Column 3 of the Action Matrix. For example, in the case of one plant in Column 3 because of two White findings in the EP cornerstone, the IP 95002 supplemental inspection report stated, "the inspectors concluded that the weaknesses were not reflective of significant performance issues."

The working group recognized that review of the IP 95002 inspection reports for only those licensees that entered Column 3 based on two White inputs would yield an incomplete picture. Therefore, the working group sampled additional IP 95002 inspection reports for licensees that moved to Column 3 from three White inputs or one Yellow input to determine if those reports documented licensee performance indicative of a degraded cornerstone. While this review was again subjective, the working group concluded that for most of the reports reviewed, there was sufficient documentation to support the degraded cornerstone determination. For instance, one

report for a licensee with three White inputs stated that the collective risk was in the "Yellow band," and the inspectors considered the NRC's regulatory response to be appropriate for the plant-specific risk consequences. Another inspection report for a licensee with three White inputs documented weaknesses in 11 safety culture components and 145 action items were identified to address the root and contributing causes, which indicated there were significant performance issues for which an IP 95002 inspection was the appropriate regulatory action.

Although the working group's conclusions on cornerstone performance drawn from the review of the IP 95002 inspection reports are subjective, these inspection reports fully documented the root causes and contributing causes of the earlier performance deficiencies, as well as the licensees' "extent-of-condition" reviews. While some may argue that these inspection reports may not address licensee efforts to address the performance gaps as they prepared for the supplemental inspection, the reports paint a fairly complete picture of licensee performance at the time the performance deficiencies were discovered.

Working Group Recommendation

Upon completion of the risk-based and qualitative reviews and analyses described above, the working group recommended revising the two White inputs in the same cornerstone to three White inputs in the same cornerstone for transition to Column 3, thus revising the degraded cornerstone definition. This change in definition would also impact the number of White inputs for licensee transition to Column 4 of the Action Matrix under the criteria of multiple degraded cornerstone (requiring one additional White input in each cornerstone) and repetitive degraded cornerstone (requiring one additional White input). The working group issued a publicly-available report documenting the basis for the recommendation (ADAMS Accession No. ML14350B164) and summarizing the data analysis to support this recommendation (ADAMS Accession No. ML14350B180). Given the potential for programmatic weaknesses that may be revealed by two White inputs in the same cornerstone, the working group recommended a revision to the IP 95001 supplemental inspection procedure (conducted following any White input) to allow for an increased scope of inspection (to include additional potential common cause analyses), to increase the likelihood of the NRC identifying potentially broader licensee performance issues. This added inspection activity would provide additional regulatory oversight for plants with two White inputs in the same cornerstone that in the past would have transitioned to Column 3.

The staff recognizes that the working group's recommendation is a reduction of regulatory oversight from the currently established levels. However, based on the preceding analysis, the change appears to be appropriate from both a quantitative and qualitative assessment. Other changes to the ROP made recently or being considered by the staff also tend in the direction of perceived or actual reduced oversight. Examples include: (1) a revision to the definition of a repetitive degraded cornerstone in IMC 0305 to extend the period before a licensee in Column 3 is at risk for Column 4 from four quarters to five quarters; (2) a revision of IMC 0305 to increase the number of findings with the same cross-cutting aspects required and the duration of those aspects before citing a cross-cutting issue; (3) ongoing reviews of the performance thresholds in certain deterministic SDPs; and, (4) continuing examination of potential changes to the scope of the component design basis IP. The staff did not evaluate the cumulative effects of these changes during the development of the Action Matrix recommendation that is the subject of this paper. The staff plans to evaluate the efficacy of these changes as part of its annual ROP self-

assessment and make any necessary adjustments. However, some staff thought the cumulative effects should be evaluated before making the change recommended in this paper.

Outreach

The staff held a public meeting on January 15, 2015, to solicit stakeholder comments on the working group's recommendation. Invitations were sent to several non-governmental organizations (NGOs), such as the Union of Concerned Scientists, Beyond Nuclear, Nuclear Information and Resource Service and Greenpeace to participate in the public meeting. The staff made the working group report and data analysis publicly available in advance of the meeting. Because NGOs were unable to attend the public meeting, the staff requested that comments on the proposal be submitted electronically. The staff received only positive comments from industry stakeholders and other members of the public who attended the meeting, but no comments were received from the NGOs.

Views in Support of Maintaining the Existing Definition (Status Quo)

Some internal stakeholders do not agree with the working group recommendation to change the definition of degraded cornerstone. Specifically, these staff members consider the current definition to be appropriate and that the working group's rationale for a change does not outweigh the benefits of maintaining the existing level of oversight.

Some staff noted that, over the 15 years of ROP implementation, the Action Matrix deviation process has never been used to preclude a licensee with two White inputs from entering Column 3, which might suggest that the greater oversight from the IP 95002 supplemental inspection was warranted.

Some staff disagreed with the working group's conclusions from the qualitative IP 95002 inspection report review described above (to determine if a cornerstone was truly degraded) because the reports do not account for licensee efforts to address the performance gaps as they prepared for the supplemental inspections, and that those inspection reports were not written with the contemporary question of a degraded cornerstone definition in mind. The criteria developed by the working group for the report reviews were also disputed.

Some staff suggested that the IP 95002 inspection is the appropriate regulatory engagement for a plant with two White inputs because it provides a "deterrent" effect, meaning that the licensee's actions to prepare for an IP 95002 supplemental inspection arrests any further performance decline.

Some staff suggested that the risk argument for summing White inputs to determine how many were approximately equivalent to a Yellow input was not consistently applied to the Green/White and Yellow/Red thresholds and that this inconsistency does not comport with the guiding principles of the ROP, (e.g., risk-informed, objective, predictable, and understandable).

Finally, some staff suggested that, with the refinements in PRA modeling realized since the initiation of the current ROP (which often now include credit for licensee recovery actions), it is more difficult for a licensee performance deficiency to be characterized as White. They assert that because it has become more difficult to assign a White color to an inspection finding in the

risk-informed cornerstones today, the significance of the findings determined to be White have greater import than when the ROP was first implemented.

The staff included these strongly-held views supporting the status quo to ensure the Commission has the benefit of various perspectives on this policy issue.

CONCLUSION:

Because no documented technical basis for the current definition of a degraded cornerstone exists, the working group sought to develop one. The staff carefully considered the working group's technical basis and recommendations, as well as the aforementioned views in support of the status quo. While there is merit to both approaches, the staff concluded that the current regulatory actions for a licensee in Column 3 of the Action Matrix may not correspond with the aggregate safety significance of two White inputs in the same cornerstone (as well as the subsequent impact on entry into Column 4). Given that one of the fundamental goals of the ROP is to be risk-informed, this recommended change reflects a more risk-informed approach to regulatory decision-making within the ROP. For this reason, the staff recommends that the definition of a degraded cornerstone be modified.

Implementation

If the staff's recommendation is approved, for completeness the staff would also need to amend the criteria for licensee transition to Column 2 of the Action Matrix. The current criteria for Column 2 are one White input, or two White inputs (in different cornerstones) in a Strategic Performance Area. The new criteria for Column 2 would be revised to include up to two White inputs in the same cornerstone and up to two White inputs in each Strategic Performance Area.

Further, the staff would make conforming changes to the definition of repetitive degraded cornerstone. A repetitive degraded cornerstone is currently defined as a cornerstone that is degraded with two White inputs or one Yellow input in a single cornerstone for more than five consecutive quarters with at least one quarter having three or more White inputs or one Yellow and one White input (the additional White input can be from any cornerstone). That definition would be revised to state, "a cornerstone that is degraded (three open White inputs or one open Yellow input in a single cornerstone) for more than five consecutive quarters with at least one of the quarters having: (1) four or more White inputs (the additional White input(s) can be from any cornerstone), or (2) one Yellow and one White input (the additional white input can be from any cornerstone).

The multiple degraded cornerstone definition would not need to be revised since it currently states "two or more cornerstones that are degraded in any one quarter," however, since the definition of degraded cornerstone would change, entry into Column 4 would require an additional White input per cornerstone under this definition.

The staff will also consider renaming Columns 3 and 4 to alleviate any confusion the existing names may have created.

If the recommendation is approved, the Action Matrix deviation process would remain available should the staff deem that additional regulatory oversight is warranted for licensees with only two White inputs in the same cornerstone.

In SRM-SECY-10-0140, "Options for Revising the Construction Reactor Oversight Process Assessment Program," dated March 21, 2011, the Commission approved the staff's recommendation to develop a construction assessment program that includes a regulatory framework and the use of a construction Action Matrix to determine the appropriate NRC response to construction findings. The construction ROP Action Matrix contains the same column entry criteria as that which is contained in the ROP Action Matrix. The staff will incorporate into the construction Action Matrix any recommendations in this paper that are approved for the ROP Action Matrix criteria.

A potential consequence of implementing the staff-recommended change would be fewer licensees moving to Column 3 of the Action Matrix, with a corresponding reduction in staff resources required to review licensee actions in response to two inputs characterized as low to moderate safety significance. (This potential resource savings would be partially offset by the additional inspection required by the enhanced IP 95001 supplemental IP.) In addition, this change, along with the recent revision to the repetitive degraded cornerstone criteria, make it less likely that a licensee will meet the criteria for a repetitive degraded cornerstone or multiple degraded cornerstones, potentially resulting in fewer licensees moving to Column 4. The staff notes, however, that there have only been two licensees since the inception of the current ROP that transitioned to Column 4 because of White inputs only, and none in the past 10 years.

Another potential consequence was suggested by NEI in their position paper dated August 18, 2014. In that paper, NEI suggested there would be fewer challenges to significance determinations for White findings if the criteria for transition to Column 3 were changed to three White inputs in the same cornerstone. While this suggestion is theoretical, the staff cannot discount the potential for fewer challenges which could result in more timely final significance determinations with an attendant reduction in resources expended for both the NRC and licensees.

RECOMMENDATIONS:

The staff recommends that the Commission approve the proposal to revise the definition of degraded cornerstone to three or more White inputs or one Yellow input. If approved, the staff would make the aforementioned conforming changes to IMC 0305 and would revise IP 95001 to include additional resources and guidance to be used when a licensee has a second White input in the same cornerstone. The revision would still be consistent with the ROP goals of being objective, risk-informed, understandable, and predictable, as well as the Principles of Good Regulation, and aligns with a tenet of the ROP to focus industry and NRC staff resources on the most significant safety issues.

The staff continuously monitors the effectiveness of changes to the ROP using the annual self-assessment process. If this recommendation is approved, the staff will use the annual self-assessment to report the trends in performance of licensees with two White findings in a single cornerstone until statistically meaningful data are available to draw a conclusion regarding the impact of this change.

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper and determined that it has no financial impact.

/RA/
Mark A. Satorius
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for Operations

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