
INSPECTION MANUAL CHAPTER 2515

LIGHT-WATER REACTOR INSPECTION PROGRAM—OPERATIONS PHASE

Effective Date: 04/22/2024

2515-01 PURPOSE

To establish the policy for the light-water operating reactor inspection program.

2515-02 OBJECTIVES

- 02.01 To obtain factual information which provides objective evidence that power reactor facilities are operated safely, and licensee activities do not pose an undue risk to public health and safety.
- 02.02 To determine the causes of declining performance before such performance reaches a level that may result in undue risk to public health and safety.
- 02.03 To identify those safety significant issues that may have generic applicability.
- 02.04 To provide direction for modifying the baseline inspection program in the event of a pandemic.

2515-03 APPLICABILITY

This inspection program is implemented when an operating license is issued for a facility.

For a Part 52 combined license (COL) holder (e.g., Southern Nuclear for Vogtle Units 3 and 4), IMC 2515 inspections in the Public Radiation Safety, Occupational Radiation Safety, Security and Emergency Preparedness Cornerstones are applicable after the Commission issues a finding, in accordance with 10 CFR 52.103(g), that the COL acceptance criteria have been met. IMC 2515 inspections in all Cornerstones are applicable at fuel load. Portions of the light-water reactor inspection program for the startup phase under IMC 2514, "AP1000 Reactor Inspection Program – Startup Testing Phase," will be implemented concurrently with IMC 2515. The light-water reactor inspection program for the preoperational testing and operational preparedness phase (IMC 2504, "Construction Inspection Program: Inspection of Construction and Operational Programs") may not have been completed by the time this program is in effect as some operational program and Initial Testing Program inspections may extend beyond the 10 CFR 52.103(g) finding.

Guidance for the transition of regulatory oversight from the Construction Reactor Oversight Process (ROP) to the ROP is provided in IMC 2505, "Periodic Assessment of Construction Inspection Program Results," section 10.04, "Assessment Prior to Transition to Reactor Oversight Process," and IMC 0305, "Operating Reactor Assessment Program," section 12.04, "Transitioning from New Construction to the ROP."

This inspection program will remain in effect until the facility is permanently shut down and enters the post-operational phase (cf. IMC 2561, "Decommissioning Power Reactor Inspection Program"). The post-operational phase occurs after a licensee submits a written certification to cease operation in accordance with 10 CFR 50.82(a)(1)(ii). After the certification is received by the NRC, the facility will no longer be subjected to the ROP and will transition to the decommissioning inspection program.

As directed by section 2515-14 and Appendix E of this IMC, inspection program can be modified in the event of a pandemic that severely reduces available inspection resources, **or other conditions that restrict inspector onsite presence.**

2515-04 DEFINITIONS

- 04.01 **Quadrennially or Every Four Years (QUAD).** The inspection will be performed at least once during Reactor Oversight Process (ROP) cycles 1-4, ROP cycles 5-8, ROP cycles 9-12, etc. It is not intended for this to be based on a rolling 4-year cycle.
- 04.02 **Triennially or Every Three Years (T)**¹. The inspection will be performed at least once during Reactor Oversight Process (ROP) cycles 1-3, ROP cycles 4-6, ROP cycles 7-9, etc. It is not intended for this to be based on a rolling 3-year cycle.
- 04.03 **Biennially or Every Two Years (B)**¹. The inspection will be performed at least once during ROP cycles 1-2, ROP cycles 3-4, ROP cycles 5-6, etc. It is not intended for this to be based on a rolling 2-year cycle.
- 04.04 **Annually (A).** The inspection effort will be performed at least once each calendar year.
- 04.05 **Semiannually (S).** The inspection effort will be performed two times each calendar year, once each half calendar year.
- 04.06 **Quarterly (Q).** The inspection effort will be performed four times each calendar year, once each calendar quarter.
- 04.07 **As Needed (AN).** The inspection effort should be performed when the activity or event occurs at the facility as specified in the guidance section of specific inspection procedures (e.g., refueling outages).
- 04.08 **Baseline Inspection Program Completion.** Baseline Inspection Program completion for a ROP annual inspection cycle is defined to be not more than four (4) inspection procedures not completed, per Region (but not more than one procedure not done per plant). For the purposes of this definition, each inspection procedure attachment is counted as a separate inspection procedure (IP). Licensee schedules are beyond the control of NRC staff. Therefore, an unforeseen delay in a licensee schedule that results in not meeting an inspection requirement does not reflect non-completion of the baseline inspection program. In such cases, the inspection requirement should be completed as soon as the licensee has completed the activity.

¹ For ROP cycles, see attachment 1

This sixteen (16) inspection procedure allowance per year nationwide equates to an annual completion rate greater than 99.5 percent (assuming an average of 3102 total inspection procedures/attachments per year nationwide - approximately 33 per year x 94 plants). This allowance is intended to provide for unanticipated disruptions in inspection scheduling that unavoidably cause an inspection procedure or attachment to not be completed and presumes that at least the minimum inspection requirements will otherwise be completed as soon as possible within the quarter immediately following the annual inspection cycle. Achieving this level of Baseline Inspection performance provides a basis to conclude that the intent of the Baseline Inspection Program has been met and therefore, for the purpose of goal monitoring, can be reported as complete for that annual cycle.

- 04.09 On-site Inspection. An on-site inspection is any direct inspection procedure effort performed through in-person observation of licensee personnel and walkdowns of licensee equipment. An inspection is still considered as on-site even if some records or documents were reviewed remotely. Note, inspection preparation and documentation are not considered direct inspection procedure effort.
- 04.10 Remote Inspection. A remote inspection is any direct inspection procedure effort that is performed off-site from the licensee's facility or associated location.
- 04.11 Hybrid Inspection. A hybrid inspection is a combination of on-site and remote inspection.
- 04.12 Virtual Meeting. An NRC meeting conducted using information technology such that a portion of the NRC staff are physically remote from the audience.

2515-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Director, Office of Nuclear Reactor Regulation.

- a. Provides overall program direction for the reactor inspection program.
- b. Develops and directs the implementation of policies, programs, and procedures for inspecting applicants, licensees, and other entities subject to NRC jurisdiction.
- c. Assesses the effectiveness, uniformity, and completeness of implementation of the reactor inspection program.
- d. In the event of a pandemic, concurs on the regions' recommendations to the modification to the inspection program in accordance with the direction provided under section 2515-14 and Appendix E of this IMC.

05.02 Deputy Director for Reactor Safety Programs and Corporate Support. Directs the development of the inspection program within the Office of Nuclear Reactor Regulation (NRR).

05.03 Director, Division of Reactor Oversight (DRO). Manages inspection program development within NRR, develops and prepares revisions to the reactor inspection program, oversees regional implementation, and serves as the NRR contact with the regional offices for program development and implementation.

05.04 Directors, Technical Divisions, NRR. Assists the Director, DRO in developing the technical content of and reviewing periodic revisions to the requirements and guidance contained in inspection procedures related to their areas of technical expertise.

05.05 Regional Administrator.

- a. Provides program direction for management and implementation of the inspection program elements performed by their regional office.
- b. Ensures, within budget limitations, that the regional office staff includes adequate numbers of inspectors in the various disciplines necessary to carry out the inspection program described in this chapter, including that which may be needed for regional supplemental and reactive inspections.
- c. Directs the implementation of the supplemental inspection program in accordance with the guidance in Appendix B of this document.
- d. Applies inspection resources, as necessary, to deal with significant issues and problems at specific plants.
- e. *Ensures that line managers assign inspectors who are appropriately trained and have the necessary knowledge and skills to successfully implement inspection procedures.* [C2]
- f. Determines that a pandemic situation which affects inspection resource availability has occurred and recommends modification to the inspection program in accordance with the direction provided under section 2515-14 and Appendix E of this IMC.

2515-06 REGULATORY OVERSIGHT FRAMEWORK

The fundamental building blocks that form the framework for the regulatory oversight process are seven cornerstones of safety: initiating events, mitigating systems, barrier integrity, emergency preparedness, occupational radiation safety, public radiation safety, and security. These cornerstones have been grouped into three strategic areas: reactor safety, radiation safety, and safeguards. This framework is based on the principle that the agency's mission of assuring public health and safety is met when the agency has reasonable assurance that licensees are meeting the objectives of the seven cornerstones of safety. The reactor inspection program is an integral part of the reactor oversight process, along with performance indicators (PIs), assessment, and enforcement. Acceptable performance in the cornerstones, as measured by the PIs and the risk-informed baseline inspection program, is indicative of overall licensee performance that provides for adequate protection of public health and safety. The PI program reporting guidelines are in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," which is endorsed by the NRC.

Another principle of the framework is that there is a level of licensee performance in the cornerstones above which the NRC does not need to engage the licensee beyond some minimum level. The risk-informed baseline inspection and PI programs constitute this minimum level of regulatory oversight and are sufficient to provide reasonable assurance of public health and safety.

The supplemental portion of the inspection program will provide more diagnostic inspections of identified problems and issues beyond the baseline. Supplemental inspections will be planned in response to issues that result in crossing an Action Matrix threshold. These changes to the inspection program are factored into the inspection program through the assessment process, as further discussed in section 8.0, below.

2515-07 OPERATING REACTOR INSPECTION PROGRAM ELEMENTS

The inspection program described in this manual chapter is comprised of the following three major program elements:

1. Risk-Informed Baseline Inspection Program (Baseline) Inspections
2. Plant Specific Supplemental Inspections
3. Generic Safety Issue, Special, and Infrequent Inspections

Overall, the inspection program emphasizes achieving a balanced look at a cross section of licensee activities important to plant safety, reliability, and risk. The baseline inspections constitute an appropriate level of inspection at plants whose overall performance remains in the licensee response band. Plants, whose performance is outside the licensee response band, will receive additional plant specific supplemental inspection based on their assessed performance in the cornerstones of safety. Additionally, Appendix D is provided for use by the resident inspectors (RIs) in conducting routine activities such as plant tours that may assist them in identifying potentially risk significant activities.

The inspection program is expected to consist of primarily on-site inspections, as they are the most effective and preferred method of conducting inspections.

The supplemental inspections, described in Appendix B, are only performed as a result of performance issues that are identified by performance indicators (PIs), baseline inspections, or event analysis. The depth and breadth of specific supplemental inspections chosen for implementation will depend upon the risk characterization of the issues as shown in the Action Matrix of the reactor assessment program (IMC 0305, "Operating Reactor Assessment Program").

The need for additional inspections to address emergent generic safety issues, such as those that were performed for motor-operated valves and year 2000 issues, will be assessed on a case-by-case basis. Also, the need for performing additional inspections to review major licensee evolutions such as testing, and operation of independent spent fuel storage facilities or steam generator replacements will also be assessed on a case-by-case basis.

To the extent practicable, future additions to the inspection program should be incorporated into the sample requirements of existing baseline inspection procedures or replace existing baseline procedures. The intent of this statement is for new baseline inspection program elements to take credit for existing program elements or replace existing baseline procedures, if possible, so that overall baseline program hours are not unnecessarily increased. Proposed increases to the inspection program should typically be offset by reductions in other inspection procedures, and should be approved by the Director, Division of Reactor Oversight.

In addition to the three elements, the inspection program also provides for the agency's response to operational events. The guidance for determining the level of response to an event is contained in NRC Management Directive 8.3, "Incident Investigation Program."

07.01 Risk-Informed Baseline Inspections

The baseline inspection program element, described in Appendix A, is to be performed at all operating reactors. It requires inspections of licensee performance in the seven cornerstones of safety.

The baseline inspections provide sufficient examination of the plants and licensee activities to determine, along with performance indicators, whether licensees are meeting the objectives of all seven cornerstones, and to identify indications of performance problems to allow further engagement by the NRC before the objectives of the cornerstones are compromised.

The inspection procedures included in the baseline inspection program are based on “inspectable areas” for the seven cornerstones of safety. The oversight framework identified key attributes for each cornerstone that need to be verified to have a reasonable assurance that the cornerstone objectives are met. Licensee performance within the key attributes is then measured by a performance indicator, a risk-informed inspectable area, or a combination of both indicator and inspection.

The baseline inspection procedures are organized by cornerstone and include the inspectable areas associated with the cornerstone. The baseline inspections are performance-based and risk-informed and emphasize the observation and evaluation of ongoing facility operations and supporting activities affecting the safety function of facility structures, systems, and components. Appendix D has been provided to assist the RIs in conducting activities that may identify potentially risk significant activities. The baseline inspections are risk informed through (1) the inspectable areas, which are based on their risk importance in measuring a cornerstone objective; (2) the inspection frequency and sample size for each inspectable area, which are based on risk information; and (3) sample selection of activities and equipment to inspect in each inspectable area, which is based on risk insights that will be modified by plant-specific information.

Appendix A contains a list of baseline inspection procedures and specifies the required frequency for their performance. The baseline inspection procedures must be completed at every plant at a prescribed interval. The expectation is that the regions should normally complete the nominal (average) number of inspection samples identified in the inspection procedure. The regions may vary the inspection samples within the ranges as indicated in each baseline inspection procedure, based on licensee performance and inspector insights. The hours listed in each of the IPs are there to inform the inspector as to the level of effort expected to complete each sample. Some samples may take more or less time than that listed in the IP. The responsible Branch Chief should be aware of the levels of inspection efforts to manage resource responsibilities. For the purposes of completing the baseline inspection program, the number of samples completed must be greater than or equal to the minimum number of samples specified in each inspection procedure. [C2]

Inspection requirements are the controlling factor in determining the amount of inspection effort necessary to complete the baseline inspections. Appendix A provides an estimate of the hours associated with each inspection procedure for overall resource planning only.

As an overarching, guiding principle, the entire inspection program from preparation, sample selection, and the pursuit of inspection findings should be implemented in a

risk-informed, performance-based manner. If an appropriate plant activity is not available for inspection, then an inspection activity need not be conducted simply to meet the minimum number of samples (i.e., the required minimum is actually lower than specified). In this manner, the baseline inspection program is risk-informed and performance-based. **In this case, a note shall be added in the Reactor Program System (RPS - see section 09), explaining that the sample was not available for inspection.**

To select risk-important plant activities, Structures Systems or Components (SSCs), or issues of concern to pursue, inspectors should use available resources such as plant-specific licensee PRA information (Plant Risk Information e-Book (PRIB)), Standardized Plant Analysis Risk (SPAR) model, external event risk information (plant PRAs or IPEEEs) or generically available risk information (NUREGs, generic communications). Inspectors should consult with regional Senior Reactor Analysts (SRA)s as necessary.

Use of risk importance measures to focus inspection on risk important SSCs is one of the leading methods to distinguish between higher and lower risk SSCs. However, inspectors should not necessarily be limited to this method to focus inspections since risk-ranking SSCs has some limitations such as not fully capturing risk impacts associated with the Initiating Events and Barrier Integrity Cornerstones and the risk importance of passive SSCs. Risk importance measures may not directly provide insights on external event risks. Risk-informed thinking in addition to the risk tools available is necessary to fully focus inspections on the most important areas of plant performance.

Inspection activities are implemented using the revision of Inspection Manual documents (IMCs and IPs) that are current at the beginning of the inspection activity. The beginning of the inspection activity is the first day of inspection preparation for team inspections. The beginning of the inspection activity is normally the first day of the inspection quarter for inspections which will be documented in **RI** integrated inspection reports.

07.02 Plant Specific Supplemental Inspections

Supplemental inspections, described in IMC 2515 Appendix B, "Supplemental Inspection Program," are designed to respond in a graded manner to indications of declining licensee performance. Licensee performance is assessed using both inspection results and performance indicator inputs in Action Matrix, described in IMC 0305, "Operating Reactor Assessment Program." Generally, supplemental inspections are performed when white, yellow, or red inspection findings are identified or when performance indicators exceed response thresholds.

07.03 Generic Safety Issues, Special, and Infrequent Inspections

Concerns with specific safety issues that arise may be addressed solely through the NRR license review process and the use of regulatory communications issued to licensees. If the concern is of safety significance, it may be appropriate to perform a one-time inspection under the safety issues program element. These inspections will be established by temporary instructions (TIs). For example, when it is determined that a safety issue addressed in a bulletin or generic letter requires inspection verification or follow-up, requirements and guidance for the inspection will be developed and issued in a TI. Unless such a TI is issued, inspection follow-up is not required to verify completion of licensees' actions discussed in a bulletin or generic letter. When a TI is issued, overall

assessment ratings may be considered in establishing priorities for conducting these inspections. The plants to be inspected will be designated in the TIs.

The resources budgeted to safety issues inspections are established by NRR. It is intended that the inspections be conducted within the resources budgeted for that element of the program.

Specific criteria for closing a TI will be addressed in the TI itself. In general, TIs should not be closed until all relevant safety issue items have been completed by the licensee and verified by inspection. However, exceptions may be considered when the licensee's schedule for completing items remaining is acceptable, properly documented, and is not a critical element to resolving the safety issue.

The need may arise for specific inspections to address major evolutions limited to a few licensees such as upgrading to a digital control system. The need for these inspections will also be assessed on a case-by-case basis and conducted under the guidance of a temporary instruction.

This element of the inspection program also includes other special or infrequently performed inspections. These inspections may be in response to events, infrequent major activities at nuclear power plants, or to fulfill the NRC's obligations under interagency memoranda of understanding. The applicable procedures are listed in Appendix C, "Special and Infrequently Performed Inspections."

An existing Appendix A or C inspection procedure may be used to evaluate emerging technical issues not related to licensee performance issues. This is not considered an Action Matrix deviation and does not require an Action Matrix deviation memorandum per IMC 0305. The Regional Administrator should inform the Deputy Executive Director for Reactor and Preparedness Programs and the NRR Office Director in a memorandum in cases where resources from multiple offices are involved (approximately 1 FTE or greater) to follow-up on technical issue(s). The purpose of the memorandum would be twofold: 1) to inform the DEDO and NRR Office Director of the reason for the additional resources and confirm that the resources would come from those already budgeted to the region, and 2) to inform external stakeholders of the additional effort being expended and the reason it is not a deviation from the ROP. This memorandum should be acknowledged in assessment letters similar to deviation memos.

07.04 Related Activities Associated with the Reactor Inspection Program

All inspections, as well as performance indicators reported by licensees, provide input to the plant performance assessment process. The performance assessment process is to be conducted in accordance with IMC 0305, "Operating Reactor Assessment Program."

2515-08 DISCUSSION

08.01 General

The inspection program described in Appendices A, B, and C is intended to provide the framework for managing inspection resources without being overly prescriptive.

However, the minimum level of inspections necessary to complete pre-defined objectives at a facility is specified. Inspections should not decrease below this level. The

minimum inspection level is intended to place inspection emphasis on elements of licensee activities most important to reactor safety, radiation safety, and safeguards.

Because ROP uses PIs and inspection findings which are evaluated for risk to determine whether all cornerstone objectives were met at a plant, only those inspection findings which rise above a minimum significance threshold (i.e., findings are greater than minor) are documented in inspection reports, except as discussed in IMC 0611, section 12. Therefore, inspection findings which are determined to be minor do not need to be nor shall be tracked or trended by either inspectors or regional managers. Instead, minor findings shall be reported to the licensee for action in accordance with the licensee's corrective action program. Licensees are expected to track and trend minor findings and issues as stated in their program. When implementing inspection procedure 71152, "Problem Identification and Resolution," inspectors may include minor findings and issues as part of their semiannual trend review. This review will determine whether the licensee has adequately identified and corrected an adverse trend, if any, resulting from all identified deficiencies, including minor findings, during the period of review. [C3]

Using a performance-based, risk-informed approach, inspectors focus their attention on activities important to safety. Performance-based inspection emphasizes observing activities and the results of licensee programs over reviewing procedures or records. For example, an inspector may identify an issue through observing a plant activity in progress, monitoring equipment performance, or the in-plant results of an activity (e.g., an engineering calculation). Discussions with plant personnel and reviewing documents should be used to enhance or verify performance-based observations. These procedures are designed to emphasize observation of activities, or those portions that are most risk significant in terms of safety and reliability. It is expected that resident and region-based inspectors will have the necessary technical capability to accurately observe and evaluate the activity.

Regional Division Directors and line managers must ensure that inspectors assigned to implement the baseline inspection procedures have the necessary training, knowledge, and skills to successfully implement the NRR programs. The inspector training and qualification program will be implemented in accordance with IMC 1245, "Qualification Program for the Office of Nuclear Reactor Regulation Programs." The following baseline inspection procedures will normally be performed by regional specialists who have achieved at least Basic Certification in accordance with IMC 1245:

- IP 71111.08, "Inservice Inspection Activities"
- IP 71111.11A and IP 71111.11B, "Licensed Operator Requalification Program and Licensed Operator Performance"
- IP 71111.21M, "**Comprehensive Engineering Team Inspection**"
- IP 71111.21N.02, "Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements"
- **IP 71111.21N.03, "Commercial Grade Dedication"**
- **IP 71111.21N.04, "Age-Related Degradation"**
- IP 71111.21N.05, "Fire Protection Team Inspection (FPTI)"
- IP 71114, "Reactor Safety Emergency Preparedness" (all attachments **except attachment 06**)
- IP 71124, "Radiation Safety – Public and Occupational" (all attachments)
- IP 71130, "Security" (all attachments)

*The remaining baseline inspection procedures will normally be performed by **RI**s who have achieved basic level (IMC 1245 Appendix A) certification. Additionally, based on their qualification and experience, regional specialists may also perform baseline inspections other than the ones listed above. Likewise, based on their qualifications and experience, **RI**s may also perform baseline inspection procedures normally performed by regional specialists. [C2]*

NRC inspectors perform a basic mission in determining whether a licensee operates the plant safely and meets current regulatory requirements and commitments. Limiting inspection to identification of specific instances where a licensee fails to meet such requirements and commitments could result in correction of symptoms rather than correction of underlying causes of licensee problems. The inspection and assessment processes establish thresholds for determining the significance of issues and whether those issues may require additional evaluation and follow up. Thus, the inspection program requires that inspectors and their managers evaluate problems to determine if follow up inspections are necessary to diagnose whether a safety concern represents an isolated case or may signify a broader, more serious problem based on the evaluated significance of the issues. Licensee management controls (e.g., QA, safety committees, etc.) may need to be examined to determine if weaknesses in these controls contributed to identified safety concerns.

The NRC inspection program covers only small samples of licensee activities in any particular area. The sample sizes specified in the inspection procedures are based on the relative importance of the area covered by the procedure to the other areas inspected by the program. They are also based on the inspectors choosing a “smart” sample instead of a statistically based random sample because the risk-informed nature of the inspection program requires the inspections to be focused on those aspects of plant operations and licensee activities that could pose the greatest risk to public health and safety. The philosophy behind this concept is that the licensee’s processes are effective if they properly deal with the items of greatest significance. Some areas (such as reviewing 10 CFR 50.59 evaluations) do not have a direct connection with risk and inspection sample sizes in these areas are chosen to provide periodic indications of a licensee’s performance in those areas.

Information related to industry operating experience can be useful to NRC inspectors during their review of licensee activities. The integration of operating experience into the Reactor Oversight Process is discussed in IMC 2523, “NRC Application of Operating Experience in the Reactor Oversight Process.” Additionally, inspectors are encouraged to use previously identified operating experience issues which are associated with each of the baseline inspection procedures as part of their inspection preparation. A list of these generic communications **and other useful resources for inspectors to search and review operating experience** can be found **at the Operating Experience Hub**, <https://usnrc.sharepoint.com/teams/NRR-Operating-Experience-Branch/OpE%20Hub/index.aspx> (non-public).

08.02 Allocation of Resources as a Function of Performance Assessment

The results of plant performance assessments are an important factor in defining the inspection program for each plant. The baseline inspections are the level of defined requirements for all plants and additional regional supplemental inspections will be planned for plants whose performance is below a certain level, i.e., the licensee

response band. The amount and focus of the additional supplemental inspections will be proportional to the plant's assessed performance and the nature of the issues that provide the indication of that performance. See IMC 0305, "Operating Reactor Assessment Program," for more detailed guidance on responding to issues with licensee performance.

Only baseline inspections, applicable generic safety issues, and special and infrequent inspections will be planned and conducted at plants whose overall performance (all performance indicators and inspection findings) is determined to be in the licensee response band.

Plants whose performance is determined to be outside of the licensee response band (see IMC 0305) should have supplemental inspections planned to examine the causes of the change in performance and corrective actions of identified findings or safety issues that have indicated the performance change.

08.03 Allocation of Resources Among Program Elements

The allocation of resources among the three principal inspection program elements (baseline, supplemental and generic safety issues) is provided for each year in the budget process.

08.04 Completion of Inspection Procedures

The baseline inspection procedures represent the inspection necessary to allow the NRC to assess performance. This means that the inspector is to perform the inspection requirements most appropriate for the inspection sample being inspected in order to declare an activity (sample) as being satisfactorily completed. The inspection procedure can be declared complete when the minimum number of inspection activities (samples) specified in each inspection procedure is completed, thus meeting the objectives of the procedure.

Performance of one inspection procedure sample may be counted as a sample for another procedure only if completed inspection requirements are common to each procedure. [C2]

The sample size may be reduced to a number below the minimum value in situations where there are an insufficient number of samples with appropriate risk significance available for inspection (e.g., a reduction of sample size to zero, if necessary, when no samples exist). Additionally, inspectors may perform more than the maximum number of inspection samples because of licensee **event or occurrence that does not or has not yet been determined to meet the requirements for a Licensee Event Report or NRC Reactive Inspection, however it is in the interest of safety that the NRC should inspect.** The responsible **branch chief** shall approve the inspection plan to complete the number of samples outside the sample range in the inspection procedure **and inform their division director and regional administrator.**

Where no sample is specified, completion of all applicable inspection requirements constitutes completion of the procedure. The inspection hours estimate, which is included in the inspection procedure attachments for planning purposes, should not be used to determine whether the inspection attachment was satisfactorily completed. This estimate is intended to provide guidelines for inspection planning and budgeting.

Director, Division of Reactor Oversight (DRO), NRR, should be informed, as soon as practicable, when it appears that the ROP baseline inspection program cannot be completed at a site. Likewise, each inspection requirement contained in the supplemental inspection procedures must be adequately addressed.

Inspection procedures identify requirements that the inspector must consider while evaluating the associated area. These requirements may not be the same as the NRC requirements placed on a specific licensee as a condition of the plant license. As such, it is not implied or intended that inspection program requirements are to be levied on the licensee. Any attempt to force inspection program requirements on the licensee is a misinterpretation of the NRC inspection philosophy, misuse of inspection requirements and could constitute a backfit.

Temporary instructions are issued for specific inspection purposes. For inspections performed using a temporary instruction, the inspector is expected to complete all inspection requirements listed.

08.05 Baseline Inspection Credit for Operational Safety Review Team Effort

The Operational Safety Review Team (OSART) review is performed by senior staff members from International Atomic Energy Agency member states. The OSART missions offer a means of assessing licensee performance and reinforcing plant self-assessments through an independent assessment process. OSART's focus is on the safety and reliability of plant operation. They review the operation of the plant and the performance of the plant's management and staff rather than the adequacy of the plant's design and compliance with its licensing basis. Based on a review of sample OSART reports and the OSART guidelines, the staff determined that although the OSART review is not risk-informed, some areas of the review overlap with the ROP baseline inspection program. The NRC believes that it would be beneficial for the U.S. nuclear power industry to continue its participation in the OSART missions.

As an incentive to encourage licensee participation in the OSART mission, the NRC grants a one-time regulatory credit (reduction in baseline inspection program) for those NRC baseline inspections that overlap, either in part or fully, with the OSART review. Accordingly, a 25 percent ROP baseline inspection credit shall be given for the following baseline inspection procedures:

- IP 71111.05, "Fire Protection"
- IP 71111.24, "Testing and Maintenance of Equipment Important to Risk"
- IP 71124.01, "Radiological Hazard Assessment and Exposure Controls"
- IP 71124.03, "In-Plant Airborne Radioactivity Control and Mitigation"
- IP 71124.04, "Occupational Dose Assessment"
- IP 71124.05, "Radiation Monitoring Instrumentation"
- IP 71124.06, "Radioactive Gaseous and Liquid Effluent Treatment"
- IP 71124.07, "Radiological Environmental Monitoring Program"
- IP 71124.08, "Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation"

In addition, a 50 percent ROP baseline inspection credit shall be given for the following inspection procedures:

- IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"
- IP 71114.05, "Maintenance of Emergency Preparedness"
- IP 71152, "Problem Identification and Resolution (PI&R)"

In order for the region to take one-time credit for reducing baseline inspections, the areas for which the credit is to be given must have been **inspected by the OSART team**. This can be determined by looking at the OSART team plan, licensee's responses and support for the OSART inspection team, documentation in the OSART report and through discussion with the OSART team leader. The NRC will not be able to directly observe the OSART team including debriefs the OSART team has with the licensee. (NOTE- OSART report areas with no findings or observations to share are typically blank. Credit is still given to the licensee for those areas that the OSART team inspected based on verbal confirmation from the OSART team or licensee). The region should assure that the OSART inspection report is made publicly available. Specific OSART findings should not normally be referenced or followed-up by the NRC, however, where a significant safety issue (potentially greater than Green) or a potential violation of an NRC requirement is identified, the NRC will independently conduct an appropriate baseline inspection to disposition potential violations and assess the significance of the finding in accordance with the ROP. These findings will be documented in accordance with IMC 0611, "Power Reactor Inspection Reports," and will also be processed as performance assessment inputs equivalent to NRC identified findings in accordance with IMC 0305, "Operating Reactor Assessment Program." The staff will perform any additional inspections for those findings that have a significance greater than Green in accordance with NRC's Action Matrix. The baseline inspection credit and NRC staff position described above are communicated to the Commission via a memorandum dated July 16, 2003 (ADAMS Accession Numbers: ML031620369, ML030930251, ML0316020346).

08.06 Baseline Inspection Program Completion and Documentation

The following guideline shall be followed when it is expected that required inspections for which the region is responsible will not be completed by the end of the calendar year:

- The missed inspection(s), if any, must be scheduled such that it will be completed during the first quarter of the next calendar year.*
- Inspection procedures which should be implemented during a refueling outage cannot be deferred.*
- Inspections may only be deferred at a plant in the licensee response column of the action matrix.*
- Acceptable reasons for deferring an inspection include unanticipated inspection resource demands resulting from providing additional regulatory attention provided to plants which are placed in the IMC 0350 process or in multiple/repetitive degraded cornerstone or unacceptable performance columns. (Refer to IMC 0305, "Operating Reactor Assessment Program," for a more detail explanation of these performance columns.)*
- The Director, Division of Reactor Projects (DRP)/**Director Division of Operating Reactor Safety (DORS)** must notify the Director, Division of Reactor Oversight (DRO), NRR, via a memorandum if the region cannot complete all the required inspections for which the*

region is responsible by the end of the calendar year. This memorandum should contain a brief explanation for the reason(s) for deferring the inspection(s), the proposed schedule for completing the deferred inspection(s), and the tracking method used for completing the required inspections.

In addition, the regions must maintain an inspection tracking system which will allow them to track which inspections cannot be completed in the calendar year so that no more than four procedures are deferred for completion in the next ROP cycle. [C2]

The regions should use the guidance provided in IMC 0306, "Planning, Scheduling, Tracking and Reporting of the Reactor Oversight Process (ROP)," to track the baseline inspection program completion for each calendar year and to ensure that the inspection procedures not performed as required by year's end stay within the four-procedure allowance (but not more than one procedure not done per plant).

By mid-February of each calendar year, the Director of DRP/**DORS** must notify the Director, DRO, NRR, via a memorandum which states that the required baseline inspections for which the regions are responsible have been completed for the previous calendar year inspection cycle in accordance with IMC 2515.

The **NRC's Force-on-Force inspections** are scheduled, conducted, and tracked by the NRC Office of Nuclear Security and Incident Response (NSIR). During a conference call on March 27, 2006, the Offices of NRR, NSIR and the Regions reached the following resolutions regarding the baseline inspection procedures for which NSIR is responsible:

- NSIR will issue a separate memorandum to the Director, DRO, by mid-February of each calendar year certifying completion of the required baseline inspections for which NSIR is responsible.
- NSIR will be responsible for entering information into RPS-Inspections for the baseline procedures which are conducted out of Headquarters (HQ) from which NSIR is responsible.

A report containing the data that support completion of the respective NSIR or regional required inspections (Report 8 from the Reactor Programs System) should be provided as an attachment to the memorandum submitted by NSIR and the Regions.

08.07 Program Feedback

The reactor inspection program is expected to be dynamic and to respond to changes in the nuclear power industry and operational experience. Therefore, the program office expects the Regions and inspectors to identify problems in implementing the program, and to recommend changes to the program for consideration by the program office. Any such feedback and recommendations should be submitted to Reactor Inspection Branch (IRIB) through the associated Regional office using the inspection program feedback process (IMC 0801).

2515-09 INTEGRATED INSPECTION PLANS

Regional offices must develop annual site-specific inspection plans consistent with the inspection planning module of RPS to help manage inspection resources and monitor the inspection programs. Under circumstances where the operation of multiple units at a site is not comparable (e.g., Salem/Hope Creek), the inspection plan should be specific for each unit. The regional integrated inspection plan (i.e., the integration of individual site or unit plans) should project the planned inspection activities and available resources for all sites as outlined in IMC 0305. The integrated plan should also provide for a summary of the fraction of regional resources allocated to each of the individual program elements discussed in section 2515-06 of this manual chapter for each site.

The Chief of IRIB shall concur on significant alterations to the baseline inspection program for a plant's annual inspection plan to accommodate the plant's particular situation. Significant alterations include treating a multi-unit site as separate single unit site, or increasing or decreasing the frequency of inspection. The number of samples inspected should normally be the nominal (mid-band), or average, of the sample range stated in each inspection procedure. Regional management's authorization to allow the number of samples inspected which falls outside the prescribed sample range is not considered a significant alteration to the baseline inspection program so long as this change is evaluated and approved by regional management. A situation where this could occur includes performing fewer than the minimum number of samples because the inspection samples are not available or performing more than the maximum number of samples because of licensee performance. Inspectors shall obtain Regional management approval for completing a number of samples less than the minimum and should obtain branch chief approval for increases in the inspection effort (e.g., executing beyond the maximum procedure sample size). The basis for the approval shall be documented in the "Notes" section of the Reactor Planning System (RPS) software program for the applicable procedure *(see IMC 0306 for details). The factors to consider when planning alterations to the baseline inspection program at a plant site include (1) known plant activities (or lack thereof), (2) the plant's size, design, and age, and (3) complexity of the licensee's programs.

The results of the end of cycle assessment activities and second quarter assessment reviews, conducted in accordance with IMC 0305, shall be used to schedule baseline inspections and to determine the amount and focus of any supplemental or special/infrequent inspections at each site (as defined in Appendix B and C of this manual chapter). The basis for the allocation or significant reallocation of resources among the sites will be documented. It is expected that the integrated plans will be living documents and be reviewed periodically, adjusted, and reissued to reflect shifts in plant performance and safety concerns. Individual site plans and the regional integrated inspection plan should be reviewed by regional management and updated at least semiannually as part of the assessment process that is discussed in IMC 0305.

2515-10 INDEPENDENT INSPECTION

As a general rule, inspections should be conducted in accordance with inspection procedures. However, it is not possible to anticipate all the unique circumstances that might be encountered during the course of a particular inspection and therefore individual inspectors are expected to exercise initiative in conducting inspections, based on their expertise, experience, and risk insights, as needed to assure that all the inspection objectives are met.

11.01 Resident Inspector Policy

The **RI**s provide the major onsite NRC presence for direct observation and verification of licensees' ongoing activities. Appendix D outlines the responsibilities of **RI**s for being aware of major activities and the current status of the plant as NRC's onsite representative. The **RI**s also are primary NRC onsite evaluators for events or incidents. See section 11.3, "Responding to Events and Event Reports," below. The greater part of initial event-related inspection effort will be performed by the **RI**s, who may be augmented by other inspectors depending on the type and significance of the event. Regional managers will decide when normal inspection activities will be resumed by those involved with inspecting events. *Unless specified otherwise, this policy applies to Residents and Senior Residents (collectively referred to as **RI**s) assigned at any licensee facility in any phase of operation deemed appropriate by the Commission to have a permanently stationed **RI**.* [C4]

a. Resident Inspector Support by Regional Management

*Regional management must ensure that adequate feedback mechanisms or venues such as routine phone calls, emails and site visits, include opportunities for **RI**s to communicate support needs or concerns.* [C5]

b. Site Coverage

For sites with two or more **RI**s, at least one **RI** or appropriately qualified region-based alternate should provide site coverage during the regular NRC workday, Monday through Friday. Site coverage by someone qualified as an inspector **should** not be interrupted for more than three consecutive NRC working days (Friday-Tuesday are three consecutive working days). Consequently, for extended absences of the **RI**s, arrangements should be made for coverage by **other** staff qualified in accordance with IMC 1245, "Inspector Qualifications." However, when qualified inspectors are not available, site coverage can be provided by an individual that is both knowledgeable and experienced in plant operations, and capable of communicating with licensee and NRC management on emerging issues and plant conditions. To maximize site coverage, regional management **are encouraged** to schedule region-based inspections during periods of **RI** absence.

In limited circumstances, site coverage absences may be extended beyond 3 days to facilitate **RI** attendance at mandatory training courses or **conference**/seminars. The intent of this exception is to maximize the amount of site coverage by qualified **RI**s by minimizing **travel days** for them to leave their assigned site to attend short duration (e.g., 1 day or less in-house) training. Exceptions to the site coverage guidance, contained in this manual chapter, **should be approved** by the Regional Administrator.

The regional administrator will be notified when the guidance (3 consecutive working days) cannot be met.

For sites with only a single **RI** (e.g., because of a vacancy, training, or extended illness) the guidance described above should be followed to the maximum extent possible.

c. Deep Backshift

Inspections performed on Saturdays and Sundays, NRC holidays that are concurrent with licensee holidays, and weeknight hours between about 6:00 p.m. and 6:00 a.m., are called "deep" backshift inspections. *In order to establish assurance licensee activities are completed with the same level or expectation for adherence to standards at all times, inspectors should inspect during deep backshift.* There are no set hours for backshift inspections because it is expected that the baseline inspection program will involve some backshift coverage on a routine basis. *Each resident office should ensure at least 50 hours of deep backshift inspection per year are completed at the site.* (This is a combined effort; no hours *should be* assigned to individual inspectors; regional and headquarters inspectors may count towards deep backshift.) These efforts should be of at least several hours duration. Inspection on holidays will count as deep backshift only if the licensee holiday is concurrent with the NRC holiday.

Inspectors should avoid predictability in scheduling their deep backshift coverage. *To the maximum extent practicable, effort should be made to spread the deep backshift coverage over a variety of days, working conditions and throughout the year* [outage, normal operations, weekends, nights, etc.].

d. Site Turnover

Regional administrators may permanently assign *RIs* to a site up to 12 months prior to the end of the tour of the incumbent inspector. This limited "early reassignment" of the *RI* position, should minimize the interruption in inspector site coverage that often occurs during the transition of *RIs*.

Regional administrators may permanently assign *Senior Resident Inspectors (SRIs)* to a site up to 6 months prior to the end of the tour of the incumbent inspector. This limited "early reassignment" of the *SRI* position should minimize the interruption in inspector site coverage that often occurs during the transition of *SRIs*. Personnel actions associated with individuals selected for early assignment will be the same as those who are assigned to the site to fill a vacant *RI* position.

The regions should closely manage the inspection resources at the sites which are impacted by this program, such that the resources expended to complete the NRC's baseline inspection program are not increased solely as a result of the additional *RI(s)* being assigned to the site.

e. Assigning RIs to Reactor Sites

For reactor licensees in the operations phase, RI staffing policy is to assign two RIs at single and dual unit sites and three RIs at triple unit sites. Exceptions may be granted to the policy for assigning RIs to reactor sites. The OEDO is responsible for assuring that each exception is consistent with Commission policy (see SECY-99-227, "N+1 RI Staffing Policy," dated September 13, 1999; and Staff Requirements Memorandum, "SECY-99-227 - N+1 RI Staffing Policy," dated January 11, 2000).

A Regional Administrator, with Director, Office of Nuclear Reactor Regulation (NRR), approval, and in consultation with the Office of the Executive Director of Operations has the authority to establish exceptions to the policy for assigning RIs to plant sites. Flexibility should be retained to adjust the number of RIs assigned to a site upward if

circumstances warrant, such as sites with diverse NSSS vendor designs or sites that have an approved unique site budget model that requires additional inspection resources. [C4]

- Regions are responsible for assigning RIs to reactor sites in accordance with this policy.*
- Regions will request approval from the Director, NRR, for proposed exceptions to the RI staffing policy. The exception request will include the Region's basis for the request. A copy will be provided to the Deputy Assistant for Operations, OEDO.*
- NRR is responsible for reviewing the exception request and for ensuring that the policy for approving exceptions is applied consistently for all Regions.*
- The Director, NRR, will notify the Region, in writing, of NRR's decision regarding an exception request. The Region may implement the exception on receiving the Director's approval. A copy will be provided to the Deputy Assistant for Operations, OEDO.*
- The Regions and NRR are responsible for monitoring exception site performance to assure exception justifications remain valid. The Regions should review exceptions that are performance based at least every 2 years and forward a renewal exception request, if necessary.*
- Regional management staff should provide heightened management oversight on staffing for sites where the number of RIs assigned is N, such as where assigned RIs are absent from the site for extended periods or the RIs are not yet qualified.*
- Vogtle site staffing projections after Vogtle 3&4 are operational and inspected as part of the ROP can be found at ML21054A234.*
- OEDO will review exceptions granted after NRR's approval has been sent to the Region. This review is intended to assure exceptions conform to Commission guidance (SECY-99-227 and associated Staff Requirements Memorandum) and are consistently applied.*
- If the Region's exception request is approved, NRR will forward an information copy of the memorandum granting approval to the Deputy Assistant for Operations, OEDO.*
- The Deputy Assistant for Operations, OEDO will have the package reviewed with emphasis on site performance and for consistency of application across Regions.*
- The Deputy Assistant for Operations, OEDO will inform the Commission as stated in SECY-99-227 of any site where performance warrants the assignment of an additional RI. [C4]*

f. RI Relocation

All resident inspector assignments will stipulate a seven-year maximum tour length. As RIs approach the 7-year point at a site, the agency will consider inspector requests for a lateral transfer. RIs are encouraged to make their desires and career goals known to

their management as far in advance as possible. Resident inspectors due to rotate during the winter months or early spring may be granted an extension to the summer months with Regional Administrator approval. Any other extensions beyond the 7-year maximum tour length must be approved by the Deputy Executive Director for Reactor and Preparedness Programs (DEDR).

Resident inspectors should not normally be assigned back to a facility where they had been previously assigned as the permanent resident. However, Regional Administrators have the authority to do so if the inspector has completed a total of at least 4 years of intervening assignments while balancing considerations such as the availability of other qualified candidates, significant senior licensee management turnover that may have occurred since the inspector was last assigned to the facility, competencies and experience gained by the inspector in the intervening assignment, and an assessment of the inspector's ability provide effective and objective oversight of the facility. A documented basis for any resident inspector reassignments to the same facility should be developed by the Regional Administrator and provided to the Director of NRR to be shared for awareness and to promote consistency in implementation. Exceptions for a proposed re-assignment where there are less than 4 years of intervening assignments must be approved by the DEDR. Reassignments made to co-located facilities that would cause RIs to interact with a different licensee would be considered an entirely new assignment for this purpose.

Resident inspectors should not be assigned to a different location within the first four years after relocating unless specifically approved by the DEDR based on identified agency needs.

This policy applies to total site tour length, and it is not affected by a promotion from RI to senior RI at a site. This policy does not preclude RIs from relocating for promotions, voluntary reassignments, or management-directed reassignments. (see SECY-98-152, "Summary of Issues and Recommended Improvements to the RI Program," dated June 29, 1998; Staff Requirements Memorandum, "SECY-98-152, "Summary of Issues and Recommended Improvements to the RI Program," dated August 21, 1998; and Implementation of the Seven-Year Relocation Policy for RIs, Memorandum from Hugh Thompson to all Regional Administrators, dated September 21, 1998.)

Any exceptions submitted to DEDR for approval should be reported to NRR/DRO. [C4]

11.02 Regional Inspector Policy

Regional inspectors conduct inspections as directed by their supervisors. In addition to baseline inspection program procedures, regional inspectors often conduct inspections under other program elements described in this chapter. Certain aspects of their inspection activity may be conducted in the regional office (e.g., portions of procedure review and administrative program inspection).

11.03 Inspection Coordination

The **SRI** and the regional Division of Reactor Projects/**Division of Operating Reactor Safety** must be kept advised of regional and headquarters inspectors' activities at the facility. The associated regional branch chief must ensure coordination of regional and headquarters inspection activities in accordance with IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites."

Regional and headquarters-based inspectors should contact the SRI before each inspection to get information concerning the availability of specific licensee personnel and the status of plant conditions that may affect the planned inspection. In addition, they should contact the SRI as soon as is convenient after they arrive at the site to ensure a coordinated NRC presence at the facility. The visiting inspectors should advise the senior resident inspector of changes to their planned inspection effort and schedule for the exit interview with the licensee. The SRI should inform the regional and headquarters inspectors of any unique activities in progress and offer specific inspection suggestions. The regional and headquarters inspectors should brief the SRI about the results of their inspection before the exit meeting with the licensee's management. The SRI (or resident inspector in their absence) should attend all exit meetings where significant issues are expected to be discussed.

11.04 Third Party Assistance

On occasion licensees ask inspectors for recommendations for obtaining help solving programmatic problems. Inspectors are prohibited from recommending the services of individuals or organizations for a project under NRC regulatory jurisdiction. Providing such a recommendation violates 5 CFR 2635.702, which prohibits Federal employees from using public office for endorsement of any product, service, or enterprise. However, the agency also has an obligation to provide assistance where possible in helping individual licensees solve problems where the health and safety of the public is involved.

The following guidance is provided to assist employees who receive requests for assistance from licensees. Specific procedures implementing this guidance should be available in each region and the Office of Nuclear Reactor Regulation. There are two cases presented. Case #1 is for use when a licensee has a programmatic problem. This case allows time for the licensee to conduct research in obtaining assistance. Case #2 is for use when an immediate health and safety problem exists. [C4]

Case 1: An NRC employee receives a request for third party assistance from a licensee.

1. The employee shall as soon as practical notify their management.
2. *Following consultation with management, the staff member may refer the requestor to any of the following sources:*
 - (a) *The current version of the Nuclear News Buyers Guide. If not otherwise available to the requestor, a copy of the Buyers Guide can be obtained by contacting the American Nuclear Society (Attn: Accounting Department), 555 N. Kensington Ave., La Grange Park, Illinois 60526-5535.*
 - (b) *A licensee that has solved a similar problem (consult with office/regional management prior to providing the name). When providing the name of a licensee who has solved a similar problem, take special care that a perception of conflict of interest is not created and that the licensee is not under an Office of Investigations investigation for misconduct.*
 - (c) *An appropriate professional society such as the American Society for Mechanical Engineers or the Health Physics Society.*

Case 2: An immediate health and safety issue exists, and it is not practical to take the action detailed in Case #1.

1. *Refer the licensee to an appropriate equipment manufacturer.*
2. *Consult with NRC management (NRR or regional office). Following management approval, the employee may refer the licensee to one or more qualified consultants/contractors who can provide prompt safety assistance. Special care should be taken in connection with providing recommendations concerning consultants with whom the recommending staff has a personal or long-standing relationship.*
3. *Following the action, document the event and the justification for the action, and provide a copy to the Office of the Executive Director for Operations (OEDO). [C4]*

11.05 Inspector Functions During Period of Lapsed Appropriation

NRC Management Directive 4.5, "Contingency Plan for Periods of Lapsed Appropriations," has defined the resident and selected region-based inspector function as an excepted NRC activity that will continue during the period of restricted NRC operations. Both resident and region-based inspectors will continue with their respective functions as follows:

1. Resident inspection function which includes the following activities:
 - Completion of all of the following activities that are normally assigned to a resident inspector:
 - IMC 0350, "Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational Concerns," completion of the activities that have been assigned to a resident inspector for the site
 - IMC 2515, "Light-Water Reactor Inspection Program-Operations Phase," including completion of all core, baseline, IMC 2515, Appendix C, "Special and Infrequently Performed Inspections," and IMC 2515, Appendix D, "Plant Status" activities that have been assigned to a resident inspector for the site
 - IMC 2516, "Policy and Guidance for the License Renewal Inspection Program"
 - IMC 2561, "Decommissioning Power Reactor Inspection Program" activities that have been assigned to a resident inspector for that site
 - Completion of reactive inspection activities pursuant to NRC Management Directive 8.3, "NRC Incident Investigation Program," and IMC 0309, "Reactive Inspection Decision Basis for **Power** Reactors." The decision to initiate a reactive inspection shall be made in consultation with the "excepted function" Regional and Program Office managers. The requirement for SRA participation in establishing the risk significance of an event that meets the deterministic criteria is waived. Residents and "excepted function" regional managers are granted the discretion to use available tools (including SDP screening tools and the licensee's risk tools) as they may be available and appropriate.

- Completion of baseline, Appendix C, reactive, and supplemental inspection activities not covered above that have been/are approved by regional management as being within the technical expertise of the residents at the site and that have been scheduled for completion during the period of lapsed appropriation.
- Emergency response, incident response, allegation, enforcement, public communication, and support for emergency licensing action activities that are typically performed by resident inspectors.

The resident inspection function does not include implementation of Reactor Oversight Process activities or other program activities in the applicable IMCs shown below that require substantial support or approval from the Regional Office or a Program Office.

- IMC 0305, "Operating Reactor Assessment Program"
- IMC 0609, "Significance Determination Process"
- IMC 0611, "Power Reactor Inspection Reports"

2. Region-based inspection function which includes the following activities:

- Initial licensing activity
- Event response which would require regional specialist expertise

The region-based inspection function does not include implementation of Reactor Oversight Process activities or other program activities in the applicable IMCs shown below that require substantial support or approval from the Regional Office or a Program Office.

- IMC 0305, "Operating Reactor Assessment Program"
- IMC 0609, "Significance Determination Process"
- IMC 0611, "Power Reactor Inspection Reports"

11.06 Coordination of Regional Requests for Headquarter Staff to Participate in the Conduct of Inspection Activities

Regional management may contact NRR/DRO/IRIB when there is a desire for an IMC 1245 qualified HQ staff member to participate in the conduct of an inspection activity.

NRR/DRO/IRIB will solicit volunteers from a list of qualified HQ staff. NRR/DRO/IRIB will forward any volunteers' information to the region so that the Region may select a participant. Regions are requested to inform NRR/DRO/IRIB of their final selection.

NRR/DRO/IRIB shall maintain a list of NRR staff qualified under IMC 1245 for use in soliciting volunteers. The qualification list, as well as a status tracker of regional requests, will be posted to the NRR/DRO/IRIB internal SharePoint site. NRC staff may contact NRR/DRO/IRIB for the site link.

11.07 Coordination of Headquarters Technical Support for Regional Inspection Activities

Regional inspectors are technically qualified in the areas in which they inspect, though there are times that inspectors may seek different levels of technical guidance or

assistance in inspection activities. This may include seeking support from HQ technical staff with specific areas of expertise.

It is important that the inspector and the technical support staff communicate clearly the context for the questions along with the questions themselves, and the level of support the inspector is seeking. Whatever the level of support, the inspectors must make it clear what the expectations are for the support they are seeking. The following guidelines are for regional requests to HQ which are seeking to understand and to inform regionally developed documents finalized and approved by the region.

1. **Minimal Effort Needed:** Inspectors have a question in a technical area they are inspecting (or preparing to inspect) and contact a technical point of contact in the region or HQ with specific questions. These occur frequently and typically take minutes to a couple of hours to respond. The time and level of support efforts are self-managed between the regional inspector and HQ staff. A response from HQ staff to the inspector is typically verbal or via email.
2. **Slightly More Effort Needed:** Inspectors have a complex question or set of questions that may take more than a few hours for the technical staff to respond to. The inspector and HQ technical staff should discuss the level of effort needed for a response. The time and level of support efforts are managed by the regional and HQ staff with HQ branch chief permission (inspectors must respect the technical staff's time and work priorities). A response from HQ staff to the inspector is verbal or via email.
3. **Request for Direct Support Throughout an Inspection:** Occasionally, an inspection team leader determines the need for HQ technical experts to support their inspection, either remotely or directly onsite throughout the inspection. When this occurs, the inspectors must request the technical staff participation through their regional branch chief to the HQ technical branch chief, due to the significant amount of time needed. The requesting inspectors must inform the relevant facility project manager for their awareness.

Occasionally, when routine channels are exhausted for resolving an issue, or the issue has become protracted or progress has stalled, or for requests that may take more than a reasonable amount of time (as agreed between the inspector/technical staff and their supervisors), then the inspectors must use a formal process such as the COM-106, Technical Assistance Request (TAR) or a formal request memorandum, since this is expected to be a significant resource commitment. Examples are: to provide a basis to dispute a licensee position, or a technical determination stemming from the inspection efforts to make final inspection determination, or requires other expertise (legal, etc.).

11.08 Contractor Support for Regional Engineering Inspections

Regional management may request the use of contract inspectors to meet the technical or staffing needs of inspections. Most commonly, contractors have been used in the past to support engineering inspections, such as the Comprehensive Engineering Team Inspection (CETI). Contractors typically have expertise in either mechanical or electrical engineering.

When a gap in engineering inspection resources is identified the region in need must first look for shared resources from within their region, solicit support from other regions,

TTC and HQ before requesting contractor support for the inspection. Regions should use the Inspections Opportunities Portal, inter-regional outreach and solicit HQ support following sections 11.09 and 11.10 of this IMC. Before contractor support will be given, the regional division director responsible for the inspection must approve the request, via email confirmation. Requests from the regions must be made through the NRR/DRO/IRIB Contracting Officer's Representative.

2515-12 GENERAL INSPECTION POLICIES

12.01 Licensee Management Entrance and Exit Meetings

Inspectors are required to meet with licensee management as part of every inspection. Region-based inspectors should hold an entrance meeting with the senior licensee representative who has responsibility for the areas to be inspected. Each inspection conducted by resident inspectors and region-based inspectors must include discussing inspection results with licensee management. At the conclusion of an inspection, inspectors must discuss their preliminary findings with the licensee's management at a scheduled exit meeting. Management entrances and exit meetings with licensee personnel should be scheduled to have the minimum impact on other licensee activities necessary to assure the safe operation of the plant.

For routine inspections, lead inspectors may coordinate with the licensees to consider whether the conduct of a virtual entrance or exit meetings is an acceptable alternative to the in-person method, with consideration of its potential to improve the NRC's efficiency and effectiveness. However, if any of the following factors apply, lead inspectors should conduct the meeting in person: the inspection is unique in nature (e.g. first of its kind, temporary instruction); elevated level of interest by stakeholders, licensee, or NRC management; the NRC and licensee are not aligned on preliminary or final results; the inspection results involve an elevated level of complexity or associated message; or an elevated level of licensee interest in the inspection or its results.

The following guidelines should be considered when preparing for exit meetings:

- Throughout the inspection process, the principle of "no surprises" should be observed. Through a combination of regular communications during the course of the inspection and pre-exit status meetings (for those licensees who wish them) the licensee should have knowledge of the issues that will be summarized in the exit meeting before the meeting occurs.
- The inspection exit meeting is an NRC-led meeting convened to allow the inspector(s) to present preliminary inspection results to the licensee. As such, the NRC representative tasked with leading the meeting must maintain control of the meeting, ensuring that the discussion remains professional, on-track and efficient. The meeting must not be allowed to degrade into a technical debate, a lecture, or a discussion of non-inspection-related issues. If the NRC exit leader finds that the purpose of the exit meeting cannot be realized (due, for example, to an overly argumentative licensee), the meeting should be terminated, and the appropriate NRC manager should be notified.

- The NRC representative tasked with leading the exit meeting may allow the licensee to record the exit meeting (either in audio or audio/video formats) provided the NRC is given a copy of the recording.
- The exit meeting should be summary in nature. It is not necessary to go into great detail on inspection items that meet regulatory requirements; a statement describing the scope of inspection and reporting satisfactory performance can suffice.
- The information presented at an exit meeting is pre-decisional in nature and subsequent management review of the inspection results may lead to changes in the characterization of issues; this should be made clear at the outset of the meeting. The inspector should also point out that if changes are made in the characterization of issues, the NRC will communicate the changes to the licensee prior to the issuance of the inspection report.
- When findings are involved, the exit meeting should include a description of the finding, and the standard which was not met. If there is a cross-cutting aspect associated with the finding, it shall be presented at the exit meeting to ensure licensee awareness of the cross-cutting aspect.
- When discussing findings that are potentially greater than green, the inspector should communicate the results of the initial SDP evaluation or the information needed in order to assess the significance.
- If the licensee expresses strong opinions or disagreement with the characterization of an issue presented at the exit meeting, the inspector should inform regional management. Such a licensee response is not documented in the inspection report.
- When implementing virtual meetings, ensure that sufficient effort is made in advance to verify the technology and users are prepared to maximize the likelihood of success. Be prepared to cancel, delay, or reconvene the meeting if technology issues arise such that insufficient participation occurs, or a loss of efficiency or effectiveness is realized. Consider obtaining feedback following the conduct of such meetings to validate that efficiency and effectiveness goals were reached.
- If proprietary information is reviewed in the course of an inspection, the inspector should confirm with the licensee at the exit meeting that NRC has (or has not) returned proprietary materials used during the inspection.
- Oral Statements and Regulatory Commitments: Do not attempt to characterize or interpret any oral statements the licensee makes, at the exit meeting or at any other time during the inspection, as a commitment. Licensee commitments are documented by licensee correspondence, after which they may be referenced in the inspection report. Oral statements made or endorsed by a member of licensee management authorized to make commitments are not regulatory commitments unless they are documented as such by the licensee. For further guidance on licensee commitments, see ML003680088 (NEI 99-04), ML003680078 (NEI Cover Letter), and ML003679799 (SECY 00-045 endorsing NEI 99-04 guidance).

- Because regulatory commitments are a sensitive area, ensure that any reporting of licensee statements is paraphrased accurately and contain appropriate reference to the licensee's document.

Time spent on scheduled and periodic entrance and exit meetings (including preparing for the meetings) is considered part of preparation and documentation of inspections. Entrance meeting time is charged to preparation and exit meeting time is charged to documentation. Daily communication with licensee management is considered to be an integral part of every inspection procedure and the time used for such routine communications should be charged to the inspection procedures used.

Communicating inspection observations also is an integral and important part of every inspection, whether done daily during the course of an inspection, or periodically with status meetings. Many licensees have expressed the desire to hear inspector insights related to safety/regulatory performance even in instances where they do not reach the threshold for documentation in an inspection report (see IMC 0611, "Power Reactor Inspection Reports"). When deciding which observations and insights to pass on to the licensee, inspectors should consider the following:

1. Inspectors should share the same insights with their regional managers and the **SRI**.
2. The insights must relate to areas within NRC's jurisdiction and responsibilities.
3. Comments should be objective and supported with examples when possible. Avoid generalizations such as "procedure adherence was good." Instead, just state the objective facts: "Procedures were followed in each case we observed." Negative observations or insights must be supported with specific examples.
4. Inspectors should not express an expectation for licensee managers to take specific actions. The inspector may comment on whether or not the actions comply with NRC requirements.
5. Inspectors should determine before the exit if the licensee wants to hear the observations and insights. If the licensee does not want the observations or insights at the exit meeting, the inspectors should not discuss them.
6. Inspectors should avoid "consulting" for the licensee and not advise them on how to improve draft documents or in-process work or pass on to licensees how other licensees do the same thing.

12.02 Review of Updated Final Safety Analysis Report (UFSAR)

For planning inspections, several baseline inspection procedures specify reviewing applicable portions of the plant's UFSAR. This review is intended to provide the inspectors with design bases insights in preparing for inspections and is not intended to be a review of UFSAR accuracy. The general focus of the baseline inspection program is to monitor licensee performance. Therefore, UFSAR accuracy will not be routinely inspected, although it is a source of information for inspections.

However, the NRC does solely rely on the accuracy of the UFSAR in making informed licensing decisions on changes. Therefore, limited requirements for UFSAR accuracy

may be incorporated into specific inspection procedures. Perform these inspection requirements as directed by the implementing procedure.

12.03 Responding to Events and Event Reports

Routine events of low significance, such as uncomplicated reactor trips, will be followed up by resident or region-based inspectors to verify that the events are not complicated by loss of mitigation equipment or other factors. This event follow-up is part of the baseline inspection program and emphasizes collecting information about the event for use by risk analysts in evaluating the risk significance of the event to help regional and headquarters management determine if a response beyond the baseline program is warranted.

The significance of operational events is evaluated using the Conditional Core Damage Probability (CCDP) metric, which best reflects the full extent of any loss of defense-in-depth due to the event, in conjunction with various deterministic criteria to address the most influential related assumptions and uncertainties. The significance is determined regardless of whether the cause is due to licensee performance or otherwise.

The agency's response to significant events is described in NRC Management Directive 8.3, "NRC Incident Investigation Program." In general, significant operational events may be investigated by multi-disciplined Incident Investigation Teams (IITs) that are initiated by the EDO and are comprised of both regional and headquarters personnel. Operational events of lesser significance may be investigated by Augmented Inspection Teams (AITs) that are initiated by Regional Administrators. Regional Administrators may also initiate special inspection (SI) teams that use only regional personnel. The applicable procedures for AITs and SI teams are listed in Appendix C, "Special and Infrequently Performed Inspections." In addition, for an event of extraordinary safety significance or profound regulatory implications, an

Accident Review Group may be formed that reports directly to the Commission, as described in Management Directive 8.9, "Accident Investigation."

Licensees often notify inspectors of events or conditions in anticipation of the inspectors' interest in the issue, but such notifications do not exempt the licensee from reporting events and conditions through the required regulatory processes. The licensee should be made aware that documents that it gives to inspectors are subject to Freedom of Information Act request and may be placed into ADAMS as public documents.

In addition to reviewing plant events to determine whether the NRC should devote additional effort and resources to respond to the event, the baseline inspection program screens for potential risk significance and possible future inspection all written event reports submitted to the NRC by licensees. The review should be acknowledged in an inspection report.

12.04 Findings Outside of Inspector's Qualifications

Inspectors sometimes identify issues or violations outside of the inspector's qualifications or expertise. In these cases, the inspector is responsible for (1) determining if an immediate threat to public or worker health or safety exists, and if one does exist to notify licensee management immediately, (2) determining if the issue is

better addressed by an inspector with different qualifications (i.e., a specialist inspector). Inspectors may follow issues outside of their qualifications or expertise with the concurrence of a regional manager responsible for the area associated with the issue and the inspector's supervisor.

Such issues are associated with the most applicable cornerstone and inspectable area regardless of the baseline inspection procedure in use when the issue is identified. The inspector's time associated with the issue is charged to the baseline procedure that best corresponds to the issue. If the issue is found during inspections other than baseline inspections, the time is charged to the procedure in use.

12.05 Communication with Local Public Officials

As a matter of management philosophy, the NRC maintains an "open door" policy with regard to access by the public or state and local officials to the NRC staff or to publicly available electronic documentation concerning a licensee's performance. Some local officials may desire increased interaction with the NRC's regional offices and Resident Inspectors. The degree of interaction that is considered necessary to enhance openness in the NRC is expected to vary widely depending on the situation at each plant. In each case where inspectors are utilized for this purpose, regional management must carefully balance the use of inspection resources to complete inspections with the need to enhance openness. Any meeting between local emergency preparedness officials and the NRC should be coordinated with the Federal Emergency Management Agency (FEMA) in accordance with the Memorandum of Understanding between FEMA and the NRC. [C1]

12.06 Witnessing Unsafe Situations

When NRC personnel identify unsafe work practices or violations which could lead to an unsafe situation, they shall make every reasonable attempt to prevent them from occurring or continuing in their presence. When such situations are identified, a licensee representative shall promptly be notified so that corrective or preventive measures can be taken.

*A goal of the NRC inspection program is to witness licensee activities in as close to a normal environment as possible. From the assessment of these observations, conclusions are drawn relative to the licensee's ability to properly conduct licensed activities. Notwithstanding this goal, under no circumstances will an NRC inspector knowingly allow an unsafe work practice or a violation which could lead to an unsafe situation to occur or continue in **their** presence in order to provide a basis for enforcement action. If such a work practice or violation is in progress, or is about to occur, the NRC inspector shall immediately bring the situation to the attention of the appropriate licensee personnel. This action shall be taken without regard for any impact it may have on the ability of the NRC to take future enforcement action. [C4]*

12.07 Diverse and Flexible Mitigation Strategies (FLEX)

The March 2011 Fukushima accident underscored how important prior planning is when it comes to safely handling extreme events at a nuclear reactor. The consequences of postulated beyond-design-basis external events that are most impactful to reactor safety are loss of power and loss of the ultimate heat sink. After Fukushima, the NRC ordered every U.S. commercial reactor to have mitigation strategies for dealing with the

long-term loss of normal safety systems following the occurrence of a beyond-design-basis external event (NRC Order EA-12-049, ML12054A735). Because of the low probability of an external event causing a simultaneous loss of all AC and normal access to the ultimate heat sink, FLEX equipment may not be considered risk/safety significant, because Mitigating Strategies (FLEX) goes beyond defense-in-depth.

IP 71111.24, “Testing and Maintenance of Equipment Important to Risk,” requires that at least one of the inspection samples be associated with FLEX testing. Additional inspection samples of FLEX and associated equipment may be inspected under the baseline inspection program subject to specific IP sample selection requirements and guidance. However, judgement should be exercised when determining additional sample selection of activities and equipment associated with FLEX, since FLEX equipment may not be risk/safety significant due to the low probability of an external event causing a simultaneous loss of all AC and normal access to the ultimate heat sink. Examples of additional risk insights that can be considered when determining sample selection include: (1) plant or site specific Probabilistic Risk Assessments (PRAs), (2) use of FLEX as a compensatory measure during maintenance activities, refueling and other outages, or adverse weather conditions, and (3) operational experience.

Implementation guidance for FLEX is found in Nuclear Energy Institute (NEI) 12-06, “Diverse and Flexible Coping Strategies (FLEX) Implementation Guide,” and endorsed via Japan Lessons Learned Project Directorate Interim Staff Guidance (JLD-ISG) 2012-01, “Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events.” Various revisions are in effect. NEI 12-06, Revision 0 (ML12242A378) is endorsed via JLD-ISG 2012-01, Revision 0 (ML12229A174). NEI 12-06, Revision 2 (ML15348A015) is endorsed via JLD-ISG 2012-01, Revision 1 (ML15357A163). NEI 12-06, Revision 4 (ML16354B421) is endorsed via JLD-ISG 2012-01, Revision 2 (ML17005A188). It should be noted that not all revisions of NEI 12-06 are endorsed.

12.08 Announced and Unannounced Inspections

The general policy for the reactor inspection program is that each inspection (except those by resident inspectors) shall be announced except when announcing the inspection could reasonably compromise the objectives of the inspector. Inspection plans are provided in the second quarter assessment and annual assessment follow-up letters in accordance with IMC 0305. The information provided normally gives advanced notice of major activities to enable the licensee to provide material to the staff for review before the activity and to ensure that appropriate licensee personnel will be available to interact with the staff. The resident inspectors should inform their management of any changes to licensee’s schedules that could impact performance of a planned inspection.

12.09 Charging Inspection Hours for Closure of Inspection Issues

Inspectors shall normally charge hours used for closure of inspection issues (e.g., closure of unresolved items (URIs)) to the original inspection activity in which the URIs were opened. This will allow tracking of inspection resources expended to resolve these types of issues. Other inspection closure activities can be charged to IP 92701, “Follow-up,” as appropriate.

2515-13 POST-LICENSE RENEWAL INSPECTIONS

13.01 Post-License Renewal Inspection Effort

IP 71003, "Post-Approval Site Inspection for License Renewal," is to be implemented to verify that license renewal programs and activities have been implemented in accordance with the requirements of Title 10 of the *Code of Federal Regulations*, Part 54.

13.02 Budget Planning

IP 71003 is not part of the baseline inspection program and is not budgeted as part of the baseline inspection program. Therefore, to ensure that inspector resources are available to complete this IP when required, planning for its performance must be projected a minimum of three years in advance of the fiscal year in which it is planned to be used.

2515-14 INSPECTION PROGRAM MODIFICATIONS IN EVENT OF A PANDEMIC

In the event of a pandemic, the NRC's Pandemic Response Plan (PRP) requires that aspects of the inspection program, identified as priority functions, be maintained. Additionally, the NRC's PRP allows modifications to less critical aspects of the inspection program in order to address limited inspection resources.

Therefore, "supplemental" and "generic safety" inspections may be postponed when authorized by the regional administrator. Baseline inspection activities may be reduced commensurate with available inspection and licensee resources. Inspections of reactor and security events (e.g., special inspections, AITs, and IITs) will continue. If necessary, the baseline inspection program **can** be reduced such that only monitoring of key plant parameters and activities **is** performed **through onsite or remote inspection**. Normal inspection activities will resume once the pandemic has passed and reasonable efforts will be made to complete missed baseline inspection activities before the end of the calendar year. Appendix E of this IMC provides additional background and basis for these actions and implementation details.

2515-15 BASELINE INSPECTION GUIDANCE FOR POWER REACTORS PREPARING FOR TRANSITION TO DECOMMISSIONING PHASE

15.01 PURPOSE

This section provides guidance and is not a program requirement. This guidance is for inspection staff at nuclear power facilities preparing to transition from an operating phase to a decommissioning phase. The guidance is specifically for the period that occurs prior to the transition from oversight in accordance with IMC 2515, "Light-Water Reactor Inspection Program - Operations Phase," to IMC 2561, "Decommissioning Power Reactor Inspection Program." For additional guidance refer to IMC 2515, Appendix G, "Baseline Inspection Guidance for Power Reactors Preparing for Transition to Decommissioning Phase." Appendix G provides recommendations on potential adjustments to ROP inspection activities.

15.02 BACKGROUND AND OBJECTIVES

The NRC staff developed this guidance using lessons learned from nuclear power plants that have permanently ceased operation (e.g., Vermont Yankee, Kewaunee, Crystal River, and SONGS) and are now being inspected and assessed under IMC 2561. The guidance applies for the period that occurs prior to the transition of oversight from the ROP to IMC 2561, "Decommissioning Power Reactor Inspection Program." During the operational phase, the integration of inspection, performance indicator, assessment, and enforcement programs using the ROP will continue to be implemented in accordance with IMC 0305, "Operating Reactor Assessment Program." However, the inherent flexibilities available within the ROP framework can be applied to adjust inspections effort (e.g., hours and samples) as needed for effective oversight of safe operation of the plant as the licensee prepares for permanent shutdown. Using this guidance, it is suggested that regional staff consider the information in IMC 2515, Appendix A, "Risk Informed Baseline Inspection Program," to develop plant specific inspection plans that ensures the ROP baseline program is adequately completed. Decisions to adjust inspection effort would typically be made based on the historical results of inspection, performance indicators, enforcement, and operational experience. Areas of focus during this time period historically were: systems that support shutdown, maintenance (preventive and corrective), Radiation Protection (HP), security, emergency preparedness (EP), corrective action program, and safety/security culture.

It is recommended that approximately 18 months before permanent shutdown, the inspection plan be re-evaluated to reallocate NRC inspection resources as the plant enters its final year of operation and begins its transition from an operating to a decommissioning phase. For additional guidance refer to IMC 2515, Appendix G, "Baseline Inspection Guidance for Power Reactors Preparing for Transition to Decommissioning Phase." Appendix G provides recommendations on potential adjustments to the inspection activities. Historically, adjustments to NRC inspection resources are discussed with NRC management for consideration/approval during the NRC internal assessment process. Quarterly assessments chaired by a Regional division director or designee have been helpful when performed 12 months prior to the plant shutdown, in consultation with NRR. Historically, during the final year of operation, **DRP/DORS** management briefed the Regional Administrator on the quarterly assessment results. Division of Reactor Safety (DRS) and Division of Nuclear Materials (DNMS)(**now Division of Radiological Safety and Security (DRSS)**) staff participation has been valuable during these quarterly assessments.

The Resident Inspection staff should be retained by **DRP/DORS** and used primarily to assist **DNMS/DRSS** with inspections during the transition from IMC 2515 to IMC 2561 oversight. A high degree of coordination in inspection scope is needed between **DNMS/DRSS** with **DRP/DRS/DORS** during the final phase of turnover to decommissioning. The ROP is in effect until the licensee certifies that all fuel has been permanently removed from the reactor vessel and placed in the spent fuel pool. IMC 2561 contains details associated with the retention of resident inspectors after the permanent shutdown of the plant.

Regions should issue a letter to the licensee which documents their removal from the ROP after the licensee submits their written certification to cease operation in accordance with 10 CFR 50.82(a)(1)(ii). Examples of these letters can be found in **ML15020A482** for Vermont Yankee and **ML13135A492** for Crystal River.

15.03 INSPECTION AND ASSESSMENT ACTIONS PRIOR TO PERMANENT CESSATION OF OPERATIONS

1. Resident/Regional Inspectors

The resident inspectors (RI) should continue to conduct routine plant tours in accordance with IMC 2515, to assess the material condition of safety-related and risk significant equipment.

Historically the following information has been useful for review during the second quarter and end of cycle assessment review meetings:

- Review of Licensee's plan for transitioning from operating to decommissioning, including licensee's managing of safety/security for plant permanent and temporary modifications. For example, one key area that was affected by the decision to decommission SONGS was associated with the fire response capabilities. Specifically, SONGS eliminated their on-site fire department and transitioned to an incipient fire response with local off-site support. These are the types of items which should be taken into consideration when adjusting the inspection approach. Additional inspection due to these changes would be recommended (i.e., equipment walk downs, training and drill observation, etc.) to ensure the licensee continues to comply with regulatory requirements.
- Information for personnel in the following departments would be recommended to ensure an adequate retention program: Operations, Engineering, Maintenance and Security staffing.
- Review of outage scope prior to permanent shutdown to gain an understanding of major jobs to assist the inspectors in evaluating whether there is a reduction in outage scope that could affect safe plant operations. This can be performed through a sampling of major safety related and/or risk significant systems, structures, and components and not meant to be an exhaustive review of outage scope.
- It is recommended that regional inspectors should inform the SRI of any potential problem areas of concern. The RI could gather and assess the information provided and determine if the potential problem area appears related to the impending shutdown and any associated safety concerns. The RI should keep the Regional Branch Chief informed of any potential problem areas. Negative trends identified during these inspections may be documented in the applicable integrated inspection reports. The results could be discussed at the second quarter assessment review meeting and the branch may recommend any additional inspection hours, samples or modules needed to inspect the area(s) potentially impacted by the impending permanent shutdown.
- During routine inspections, DNMS/DRSS inspectors should consider whether or not the impending cessation of operation is adversely affecting licensee performance relative to the Independent Spent Fuel Storage Installation (ISFSI) or the construction of the ISFSI.
- Appendix G provides recommendations on potential adjustments to the inspection activities that can be used to perform a more detailed assessment of

performance in one or more of the areas listed above potentially impacted by the impending shutdown.

END

Appendices:

- A. Risk-Informed Baseline Inspection Program
- B. Supplemental Inspection Program
- C. Special and Infrequently Performed Inspections
- D. Plant Status
- E. Inspection Program Modifications During Public Health Emergencies or Other Conditions Restricting Inspector Onsite Presence
- G. Baseline Inspection Guidance for Power Reactors Preparing for Transition to Decommissioning Phase

Attachment 1: Chart of ROP Cycles

ROP Year	1	2	3	4	5	6	7
Start Date	04/01/2000	04/01/2001	01/01/2002	01/01/2003	01/01/2004	01/01/2005	01/01/2006
End Date	03/31/2001	12/31/2001	12/31/2002	12/31/2003	12/31/2004	12/31/2005	12/31/2006
Biennial Cycles	1 st Biennial		2 nd Biennial		3 rd Biennial		4 th Biennial
Triennial Cycles	1 st Triennial			2 nd Triennial			3 rd Triennial

ROP Year	8	9	10	11	12	13	14
Start Date	01/01/2007	01//01/2008	01/01/2009	01/01/2010	01/01/2011	01/01/2012	01/01/2013
End Date	12/31/2007	12/31/2008	12/31/2009	12/31/2010	12/31/2011	12/31/2012	12/31/2013
Biennial Cycles	4 th Biennial	5 th Biennial		6 th Biennial		7 th Biennial	
Triennial Cycles	3 rd Triennial						
		4 th Triennial			5 th Triennial		

NOTE: The 3rd and 4th triennial cycles overlap in CY2008. If a triennial inspection is performed in CY2008, the inspection counts for both the 3rd and 4th triennial cycles and next required inspection will take place during the 5th triennial cycle.

Attachment 1 - Chart of ROP Cycles

ROP Year	15	16	17	18	19	20	21
Start Date	01/01/2014	01/01/2015	01/01/2016	01/01/2017	01/01/2018	01/01/2019	01/01/2020
End Date	12/31/2014	12/31/2015	12/31/2016	12/31/2017	12/31/2018	12/31/2019	12/31/2020
Biennial Cycles	8 th Biennial		9 th Biennial		10 th Biennial		11 th Biennial
Triennial Cycles	6 th Triennial			7 th Triennial			8 th Triennial

ROP Year	22	23	24	25	26	27	28
Start Date	01/01/2021	01//01/2022	01/01/2023	01/01/2024	01/01/2025	01/01/2026	01/01/2027
End Date	12/31/2021	12/31/2022	12/31/2023	12/31/2024	12/31/2025	12/31/2026	12/31/2027
Biennial Cycles	11 th Biennial	12 th Biennial		13 th Biennial		14 th Biennial	
Triennial Cycles	8 th Triennial		9 th Triennial			10 th Triennial	
Quadrennial Cycles	N/A		1 st Quadrennial				2 nd Quadrennial

ROP Year	29	30	31	32	33	34	35
Start Date	01/01/2028	01//01/2029	01/01/2030	01/01/2031	01/01/2032	01/01/2033	01/01/2034
End Date	12/31/2028	12/31/2029	12/31/2030	12/31/2031	12/31/2032	12/31/2033	12/31/2034
Biennial Cycles	15 th Biennial		16 th Biennial		17 th Biennial		18 th Biennial
Triennial Cycles	10 th Triennial	11 th Triennial			12 th Triennial		
Quadrennial Cycles	2 nd Quadrennial			3 rd Quadrennial			

Attachment 2: Revision History for IMC 2515

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
C1	07/09/2002 CN 02-027	Revised to add a new section (12.05) which provides guidance on increased communication between the regional offices/resident inspectors and local public officials. This change was made specifically to satisfy a commitment made by NRR to resolve a concern which arose following the IP2 tube rupture event where the local county official wanted increased communication with the resident inspectors.	N/A	N/A
N/A	ML003766127 01/24/2003 CN 03-001	Revised to add a section 04.07 to define baseline inspection program completion for an ROP annual inspection cycle. Section 13.02 was also added to discuss budget planning to perform IP 71003, "Post-Approval Site Inspection for License Renewal."	N/A	N/A
N/A	ML040690230 02/02/2004 CN 04-003	Revised to reflect recommended changes to define the periodicity of biennially and triennially. The section of inspection policy has been revised to allow early assignment of replacement senior and resident inspectors to a site to prior to the end of the tour of the incumbent inspector.	N/A	N/A
N/A	ML050910423 03/30/2005 CN 05-009	Revised to reflect the inspection program policy regarding baseline inspection credit for Operational Safety Review Team Effort as described in memorandum addressed to the Commission dated July 16, 2003.	N/A	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
C2	ML052100164 07/28/2005 CN 05-022	<p>Revised to address recommendations from a Office of Inspector General's audit of the NRC's baseline inspection program (OIG-05-06):</p> <ul style="list-style-type: none"> - provided basis and rationale for the baseline inspection procedure sample size, including a discussion of when, or why, to use more than minimum samples. - provided additional management guidance for assigning inspectors to perform inspection procedures to ensure that inspectors are adequately qualified for their assignments. - improved inspection guidance on whether performance of one inspection procedure sample can be counted as a sample for another. - clarified expectations and requirements for which inspection procedures cannot be deferred, plants where procedures cannot be deferred, criteria for deferring a procedure and reporting requirements when inspections are deferred. - added a program requirement for regions to maintain an inspection tracking system so that no more than four inspection procedures are deferred in a calendar year. 	N/A	N/A
C3	ML053050152 11/28/2005 CN 05-031	<p>Revised to address recommendations from an Office of Inspector General's audit of the NRC's baseline inspection program (OIG-05-06):</p> <p>Revised to clarify a ROP program expectation that inspection findings which are determined to be minor do not need to be nor shall be tracked or trended by either inspectors or regional managers.</p>	N/A	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML061580550 01/26/07 CN 07-004	Revised to address changes to the inspection program in the event of a pandemic and to clarify baseline inspection program completion reporting requirements by the regions and NSIR. Completed 4-year historical change notice search.	N/A	ML063460228
N/A	ML070720188 09/20/07 CN 07-029	IMC 2515 has been revised to add additional guidance on the conduct of exit meetings.	N/A	ML071560246
N/A	ML080370290 05/01/08 CN 08-014	Added attachment 1 "Chart of ROP Cycles"	N/A	N/A
C4	ML092220484 09/24/09 CN-09-022	Incorporated Executive Director Operations Field Policy Manual guidance related to: No. 8 - Resident Inspector Relocation Policy, No. 13 - Witnessing Unsafe Situations, No. 18 - Guidelines for Assigning Resident Inspectors to Reactor Sites and Granting Exceptions to the Policy, and No. 19 - Guidance for Recommending Third Party Assistance to Licensees	N/A	N/A
N/A	ML11279A088 11/19/12 CN-12-026	Incorporated recommendations proposed in feedback forms 2515-1327; -1409; 1563; -1576; and -1577.	N/A	ML12292A313 ML12321A240 ML12321A243 ML12321A244 ML12321A247 ML12321A249
N/A	ML13037A177 06/19/13 CN-13-014	Incorporated recommendations proposed in feedback forms 2515-1733; -1767; and -1790.	N/A	ML13109A367

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML13176A336 10/18/13 CN 13-025	IMC 2515 was revised to clarify what constitutes a deviation from the ROP and includes details on transitioning from IMC 2515 (Operating Reactors) to IMC 2561 (Decommissioning); Incorporated recommendations proposed in feedback form 2515-1884.	N/A	ML13274A627
N/A	ML14321A055 05/01/15 CN 15-009	IMC 2515 was revised to provide guidance to resident and region-based inspectors on the scope of their excepted functions during period of lapsed appropriation.	N/A	ML15107A177
C5	ML16006A284 02/01/16 CN 16-004	Revised to (1) address recommendation from Office of Inspector General's audit OIG-14-A-12, "Survey of NRC's Support Provided to Resident Inspectors" (new subsection (11.07) added); and (2) include new ROP framework guidance (section 15 and Appendix G) to adjust baseline inspection effort (e.g., hours and samples) when licensees begin the transition to permanent shutdown and decommissioning.	N/A	ML15188A020

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML17079A202 03/28/17 CN 17-008	<p>Revised to add section 11.09, "Coordination of Regional Requests for Headquarter Staff to Participate in the Conduct of Inspection Activities." (This revision rescinds draft IMC 0302, "Coordination of Regional Requests for NRR Staff to Participate in the Conduct of Inspection Activities.")</p> <p>References to "Deputy Assistant for Operations, Technical, Budget and Performance Management (TBPM), OEDO" have been replaced with "Deputy Assistant for Operations, OEDO" to reflect organizational change.</p> <p>Section 9 indicated that the integrated inspection plan should project 18 months. IMC 305 indicates a 24-month schedule should be projected. Section 9 revised to indicate that the integrated inspection plan should project as indicated in IMC 0305.</p>	N/A	ML16200A248

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML18134A170 07/03/19 CN 19-022	<p>Adjusted inspection planning assumptions to reflect plant transitions to the decommissioning phase of operations. Outlined expectations to consider when evaluating changes that may increase the scope of the NRC inspection program. Provided enhanced documentation guidance to follow when performing inspection program activities above targeted nominal values. Added additional sources of risk-related plant-specific information to consider when selecting risk-informed inspectable areas. Described when deviations from resident inspector site coverage requirements may be relaxed to enhance overall inspection program implementation.</p> <p>Deleted references to obsolete financial tracking codes, updated hyperlinks and references to NRC Inspection Manual Chapters, Inspection Procedures and NRC office titles. Provided additional wording regarding expectations regarding use of the requirements outlined in NRC inspection procedures. Clarified expectations regarding meetings between local emergency preparedness officials and NRC inspectors. Adjusted guidance regarding staffing of resident inspectors at sites that have a site unique budget model inspection program. Updated guidance regarding post license renewal inspection activities to reflect ongoing inspection activities in this program area. Updated the titles of inspection procedures and inspection manual chapters to reflect current wording. Removed all references to "mid-cycle" and "mid-year" and replaced it with second quarter assessment review to reflect the change in the NRC assessment processes.</p>		<p>ML18222A408 2515-1926 ML18241A186 2515-1958 ML18241A187 2515-2101 ML18241A188 2515C-2154 MI18219A828 2515-2164 ML18241A202 2515-2191 ML18241A189 2515-2210 ML18241A203 2515-2228 ML18241A190 2515-2287 ML18241A204 2515-2383 ML19184A205</p>

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A		(Continued) Provided additional guidance regarding the charging of inspection hours during the review of previously opened items. Added applicability to new reactors and removed outdated references for new reactor Inspection Manual Chapters.		
N/A	ML19345F282 12/20/19 CN 19-041	Clarified guidance and approval authority for inspectors should they plan to complete less than the minimum sample in an inspection procedure or plan to inspect beyond the maximum samples size or greater than 15 percent of budgeted hours in an inspection procedure. Updated Division of Inspection and Regional Support to Division of Reactor Oversight.	N/A	N/A
N/A	ML20084F482 10/06/20 CN 20-048	Deleting the 15 percent over/under budgeted hours branch chief approval requirement. Deleted redundant supplemental inspection information in section 07.02 to maintain consistency with IMC 2515 Appendix B and IMC 0305. Corrected minor editorial errors. Added section 11.10 for HQ support of regional inspections.	N/A	ML20087M209
N/A	ML21062A084 03/08/21 CN 21-012	Revised to add Vogtle site staffing projections after Vogtle 3&4 are operational and inspected as part of the ROP.	N/A	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML23305A237 04/22/24 CN 24-012	Revised to address recommendations from the Resident Inspector Recruitment and Retention working group (ML22046A228), the COVID Lessons learned definitions of onsite, remote and hybrid inspections, updates to address changes stemming from inspection procedure additions and subtractions, and to address changes to staff direction regarding OSART team reviews in order to comply with our agreements with IAEA. Also added guidance for requesting contractor inspector support.		ML23306A151