

April 26, 2000

MEMORANDUM TO: Hubert J. Miller, Regional Administrator, Region I
Luis A. Reyes, Regional Administrator, RII
James E. Dyer, Regional Administrator, RIII
Ellis W. Merschoff, Regional Administrator, RIV

FROM: William M. Dean, Chief */RA*
by Cornelius F. Holden Acting For/
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: MANUAL CHAPTER 0610, REACTOR INSPECTION REPORTS

Attached is a Draft revision of Manual Chapter IMC 0610*, Reactor Inspection Reports. The document has substantially streamlined the inspection report process, incorporating the Revised Oversight Process (ROP). The document has been revised to address lessons learned from the pilot program as well as regional feedback. While we are issuing the document for use, you and your staff did not have an opportunity to review some of these changes. Therefore, we would appreciate any feedback from you or your staff over the next several weeks.

Additionally, in the near future, we intend to make additional revisions to (1) integrate all routine inspection reports into an integrated report to achieve a greater level of consistency in style, format and content among the regions and (2) alter the timeliness goals to make routine reports due in 21 days vice 30 days and integrated reports due in 30 days vice 45 days. This is being recommended in recognition of the reduction of inspection report content and to provide information to the public in a more timely manner. We are also soliciting your feedback on these two items. Note that Region II is conducting a six month pilot test of quarterly integrated reports that may be considered as a possible future methodology. This may also impact the above timeliness goals.

The following significant changes, including the lessons learned during the new regulatory oversight implementation pilot program, have been made to IMC 0610* (Reactor Inspection Reports) since it was last issued in DRAFT form in November 1999.

1. Non-significant and Minor Violations/Issues: A new flow chart (Appendix E) was created to filter out minor issues irrespective of whether the concern is a violation or an issue. The chart is to be used in conjunction with a series of three sets of questions (Appendix E) to determine whether an issue should be documented or not, and to determine the correct dispositioning of the issue. The entire process is described in 05.02. Thresholds of Significance.
2. Cross-cutting Issues: A new section, 05.02.g. was created to provide guidance on how to document individual and multiple cross-cutting issues and how to record each in the Plant Issues Matrix.

3. Supplemental Inspections: Appendix B, Documentation Guidance for Supplemental Inspections was added which provides detailed guidance, including examples of how to document a supplemental inspection.
4. Examples of Minor Violations: Appendix D, Guidance for Classifying Violations as Minor Violations, issued September 20, 1999, by the Office of Enforcement is now incorporated into MC0610*. This provides numerous examples in each area of what the agency considers to be minor, and provides a benchmark for calibrating inspectors judgement with regard to minor issues.
5. Plant Issues Matrix: Appendix C, Detailed Guidance for the Plant Matrix, which has been revised to incorporate the reactor oversight process was added to MC0610*
6. Regional Comments: Numerous regional comments were incorporated throughout the document. Several definitions were added as well as new paragraphs in order to clarify those areas where confusion existed. All changes are annotated with a side bar.
7. Other: Several paragraphs and Appendices were removed where the document was redundant or where confusion existed. Note that there are no side bars where material was removed and there were no additions.

As I noted earlier, many of the changes made to IMC 0610* are a direct result of regional feedback, while others are the results of ongoing refinements to the ROP. Change bars have been included in the margins to help the reader identify where changes have been made. As you and your staff gain familiarity with MCI 0610*, we welcome suggestions on how to improve the document. Tom Foley of my staff is my key contact point for IMC 0610* and can be reached at email TXF1 or by phone at 301-415-1036.

cc: A. Randolph Blough, Director, Division of Reactor Projects, RI
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Loren R. Plisco, Director, Division of Reactor Projects, RII
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