

NRC INSPECTION MANUAL

IIPB

MANUAL CHAPTER 2901

TEAM INSPECTIONS

2901-01 PURPOSE

This Inspection Manual Chapter (IMC) includes policies, guidance, and responsibilities for developing and conducting team inspections of reactor licensee facilities and activities.

2901-02 OBJECTIVE

The objective of a team inspection is to provide an independent, in-depth, and balanced assessment of one or more aspects of licensee performance by means of a team of specialists in a number of technical disciplines.

2901-03 DEFINITIONS

Team Inspection. For the purposes of this chapter, a team inspection is a major activity that is subject to the scheduling controls defined in IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites."

2901-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Director, Office of Nuclear Reactor Regulation

- a. Provides guidance when needed on which safety issues should receive special emphasis, including team inspections.

04.02 Chief, Inspection Program Branch (IIPB), DIPM, NRR

- a. Manages overall inspection program development including NRC inspection manual procedures and temporary instructions dealing with safety issues inspections.
- b. Interacts with NRR staff to ensure that a temporary instruction or an inspection procedure is written for each type of inspection.
- c. Manages conduct of all NRR-led team inspections, including approval of inspection reports.
- d. Coordinates contractor technical assistance for NRR and region-led team inspections within allocated funds.

- e. Identifies apparent violations and other safety matters from NRR-led team inspections that warrant regional attention and transmits these to the region for action.
- f. Provides resources, as available and requested, to follow-up complex technical issues identified in NRR-led inspections. This follow up includes participating in significance determination process and enforcement review panels (SERPs) or meetings with the licensee, if necessary.
- g. For inspections performed by headquarters, informs the region regarding which baseline inspection procedures or parts thereof, as described in IMC 2515, Appendix A, may be satisfied by the inspection.

04.03 Directors, Division of Engineering and Division of Systems Safety and Analysis, NRR

- a. Recommend concepts for new types of safety issues inspections.
- b. Develop the basis and technical content in the division's areas of responsibility for inspection procedures and temporary instructions.
- c. Provide technical specialists as members of inspection teams and ensure their full participation in the inspection.
- d. Review technical issues in draft inspection reports as requested by the regions or the IIPB.

04.04 Director, Division of Licensing and Project Management, NRR

- a. Participate in coordinating and scheduling team inspections in accordance with IMC 0301 requirements for major activities at commercial reactor sites.
- b. Ensure that NRR project managers are involved in the planning and conduct of team inspections at their reactors and, to the extent practicable, attend the pre-exit meeting with the team and the exit meeting with licensee management.

04.05 Regional Division Directors

- a. Recommend specific plants for inspection by an NRR-led team. Consider use of team inspections whenever it is necessary to conduct a multi-disciplined and in-depth examination of licensee activities.
- b. Prevent duplication of inspection effort by taking credit in the region's program of planned inspections for areas covered by NRR or region-led team inspections.
- c. In accordance with IMC 0301, coordinate proposed team inspections at individual reactor sites to "...avoid duplication and to prevent poorly-timed visits from occurring." This includes considering other activities occurring at the same time as the team inspections.
- d. Announce team inspections to affected licensees in advance when feasible (as much as nine months in advance, but normally at least two to three months). See IMC 0300, Section 05.07. The announcement gives the dates for the inspection and the subject but not the specific sample that has been selected for the inspection. Advance announcement is necessary to ensure availability of licensee personnel and documents.

- e. Schedule and support the training of regional team leaders and team members in accordance with IMC 1245.
- f. Support NRR-led team inspections conducted within the region by assigning one or more regional personnel to the team and by designating a regional manager (usually SES level) to participate in the exit meeting with licensee corporate management.
- g. Provide regional followup to safety matters related to NRR-led inspections, including issuing notices of violations (developed by NRR) after making a determination on severity level.

2901-05 PROGRAM REQUIREMENTS

05.01 Preparation for a Team Inspection. Team specialists can come from the regions, NRR technical staff, or contractors.

- a. Responsibilities of Individual Team Members During the Entire Inspection Process. During preparation, site inspection, and report writing, team members report to the team leader. To ensure their dedication to the inspection, they must be relieved of other tasks.
- b. Inspection Plan. The team leader develops a plan that describes the purpose of the inspection, background material regarding the facility, requirements and format for input to the inspection report (including deadlines), travel information, and responsibilities of team members.

The inspection team members develop plans for their inspections, including the inspection sample, documents required, and interfaces with other team members.

- d. Pre-Inspection Visit. The team leader and one or more team members will normally visit the facility to establish contacts, gather background information that is needed for inspection preparation, and define what support (e.g. office space, contacts) NRC needs from the licensee for the inspection. The licensee will receive sufficient advance notification of the visit to ensure that materials needed for the inspection will be available. The resident inspection staff should be invited to participate in each pre-inspection visit.
- e. Review of Background Information. Each team member dedicates sufficient time to inspection preparation so that he/she can efficiently use their time onsite. Preparation includes becoming familiar with the licensee's organization and processes; history of problems at the plant; recent inspection findings; licensee work underway or planned; and relevant documents.

05.02 Onsite Activities. The resident inspection staff can identify areas that the inspection team should pursue, and provide background information on issues. The senior resident inspector should be informed of preliminary inspection findings.

- a. Communications During Inspection. The team leader should hold a brief daily team meeting to coordinate activities and identify problem areas that may need additional inspection effort. If the team is split between site and corporate offices, then participation by conference call should be arranged. The synergism of team meetings allows related inspection findings in different areas to be brought together. It also provides team members insights through interfacing with other disciplines.

- b. Preparation for the Exit Meeting. The team leader, in consultation with his or her management, has the responsibility to decide what to include in the NRC's presentation to the licensee and which team members should make presentations at the exit meeting. Individual team members should rehearse their presentation in front of the inspection team and NRC managers to benefit from the group's constructive suggestions.

- | 05.03 Documenting Results of the Inspection. NRC IMC 0610* contains guidance on the preparation of inspection reports. The team leader compiles the inputs from team members as the basis for the report. Because the team members' disciplines are diverse, it is important for the team leader to ensure consistency of the report's format for all team members. This is best achieved by establishing a clear report format as part of the inspection plan (see 05.01.b). The inspection report will include a summary of findings in plain English as stated in IMC 0610* and in accordance with SECY 99-070.

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