

### INFORMATION TECHNOLOGY SUPPORT FOR THE REACTOR OVERSIGHT PROCESS

#### 0306-01 PURPOSE

01.01 To provide program office policy and guidance for the use of NRC information management systems, such as the Reactor Program System (RPS) and the Reactor Oversight Process (ROP) Web page to support ROP implementation.

01.02 This manual chapter discusses the following specific areas:

- a. Inspection Procedure Planning and Frequencies
- b. Inspection Procedure Status and Sample Sizes
- c. Charging Time for ROP Activities
- d. Inspection Report and Item Numbering
- e. Entering Inspection Findings into the Plant Issues Matrix (PIM)
- f. ROP Web Posting Process and Schedule

#### 0306-02 OBJECTIVES

02.01 To establish the policy and processes for entering and maintaining data in RPS and other NRC information systems used to support the ROP.

02.02 To help users of RPS and other NRC information systems, as well as NRC management, in understanding and utilizing ROP-related information provided by these information systems.

02.03 To ensure consistency in the format and content of ROP-related data entered into RPS and other NRC information systems.

02.04 To ensure that the ROP-related data entered into RPS are complete, accurate, and timely for plant assessment and ROP self-assessment.

NOTE: ROP-related data from RPS and other NRC information systems are used for several purposes, including: (1) producing official agency records; (2) developing the ROP Web Page; (3) providing inputs to NRC management decisions; and (4) answering questions that the NRC receives from Congress, the Commission, State officials, interveners, and other interested parties.

## 0306-03 DEFINITIONS

The terms used in this manual chapter are consistent with the definitions provided in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," and IMC 0612, "Power Reactor Inspection Reports."

03.01 Reactor Program System (RPS). A collection of databases that provides an integrated methodology for planning, scheduling, conducting, reporting, and analyzing most of the reactor inspection functions and activities performed by the NRC regions and headquarters.

03.02 Inspection Planning Cycle (IPC). The annual period during which inspections are planned and plant performance is assessed that begins on the first of January.

03.03 Plant Issues Matrix (PIM). A consolidated listing of individual plant issues (i.e., inspection findings) that contains information on issues related to plant performance.

03.04 Agencywide Documents Access and Management System (ADAMS). The information system that the NRC uses to maintain and disseminate the agency's official records.

03.05 Event date. The exit date of the inspection which in most cases should correspond to the end of the pertinent inspection period in which the finding was identified.

## 0306-04 RESPONSIBILITIES AND AUTHORITIES

### 04.01 Program Offices

- a. Ensure that RPS implementation is consistent with related NRC policies, programs, and guidance, as well as other NRC information systems.
- b. Resolve RPS implementation problems, prioritize system enhancements, and update and issue implementation guidance.
- c. Verify the accuracy and timeliness of the data maintained in RPS and on the ROP Web page.
- d. Control access to RPS by program office users.
- e. Maintain and control the data in the RPS Inspection Procedure Authority System (IPAS) module to ensure accuracy and compliance with the NRC Inspection Manual.
- f. Ensure the timely and accurate recording of time for all program office activities to support the ROP.
- g. Ensure the timely and accurate transfer of inspection reports, assessment letters, and inspection plans from ADAMS to the Web server to support the posting of this information to the ROP Web page.

- h. Ensure the timely and accurate posting of ROP data to the ROP Web page in accordance with established schedules.

#### 04.02 Regional Offices

- a. Ensure the timely and accurate entry of RPS data for all regional activities including, but not limited to, the inspection plan and the PIM.
- b. Ensure effective management of open items tracked in RPS in accordance with regional policies, procedures, and practices.
- c. Ensure complete and accurate entry of enforcement-related open items, including notices of violation, non-cited violations, notices of deviation, and escalated enforcement items.
- d. Control access to RPS by regional office users.
- e. Ensure the timely and accurate recording of time for all regional activities to support the ROP.
- f. Ensure the timely and accurate entry of inspection reports, assessment letters, and inspection plans in ADAMS to support the posting of this information to the ROP Web page.

#### 04.03 All RPS Users. Ensure that the following security considerations are understood and adhered to:

- a. Access to RPS modules (i.e., IP, IR, etc.) is controlled via the RPS Security Access System (SAM) module to ensure that entry and update capabilities are restricted to authorized personnel only. The SAM module is maintained by designated Office of Nuclear Reactor Regulation (NRR) and regional representatives. These representatives have the capability to allow or restrict access to each RPS module by any individual member of the NRC staff.
- b. RPS may contain pre-decisional information, so system confidentiality is necessary to prevent inappropriate disclosure of this type of information. Provisions for controlling access to information found in the RPS database are specified in the Privacy Act of 1974, 5 USC 552a, and in the NRC's regulations specified in 10 CFR Part 9.
- c. To the extent possible, proprietary data, security information, and other sensitive unclassified information should be excluded from both the RPS database and the ROP Web page. Reference to an allegation or an alleged should always be excluded.

### 0306-05 GENERAL REQUIREMENTS

05.01 Reactor Program System. Detailed information on entering and updating RPS data, understanding the computer screen layouts, and creating and printing reports is provided through the RPS Help Services Web page. The RPS Web page can be

accessed from the RPS Help menu. From the RPS Web page, users can access the RPS Dynamic Web page and user guides, and can send email messages directly to RPSHELP.

#### 05.02 Inspection Procedure Planning and Frequencies

- a. The regions use the RPS Inspection Planning (IP) module to plan and schedule inspections based on an annual inspection planning cycle (IPC). IPCs begin on the first of January and end on December 31st. Quarters are defined within the IPC as standard calendar quarters (i.e., Q1 is January 1 - March 31, Q2 is April 1 - June 30, Q3 is July 1 - September 30, and Q4 is October 1 - December 31).

RPS/IP Report 22, "Inspection/Activity Plan," may be used to review the planned inspection activities for any plant, for any given period of time. In accordance with IMC 0305, the inspection plan that is attached to the Annual Assessment letter and Mid-Cycle letter is produced by running RPS/IP Report 22 to provide a schedule of NRC inspections at a given site for approximately the next year. These inspection plans are posted on the ROP Web page, along with the assessment letter that accompanied them.

- b. The regions plan inspections by scheduling inspection procedures that are listed in the RPS/Inspection Procedure Authority System (IPAS) module. The NRR Inspection Program Branch (IIPB) maintains the inspection manual and procedures in accordance with IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual." IIPB also maintains and controls the data in the RPS/IPAS module to ensure accuracy and compliance with the IMC.

Some baseline inspection procedures are assigned two different inspection frequencies; however, the IPAS module can assign only one inspection frequency per procedure. In order to accommodate the inspection planning process and the IPAS module, a system was developed to create an artificial inspection procedure for those inspections that are implemented with more than one frequency. This numbering scheme exists only in RPS and does not affect the listing, content, or application of an inspection procedure outside of RPS. Table 1 lists the baseline inspection procedures by inspectable area and how they are listed in the RPS/IPAS module. All other inspection procedures not listed in Table 1 are listed in RPS by the actual inspection procedure number.

#### 05.03 Inspection Procedure Status and Sample Sizes

- a. Upon completion of the inspection; i.e., no later than ten days after the exit meeting, the cognizant branch chief (or designee) must update the completed sample size of each inspection procedure used during the inspection (procedures referenced in the inspection report).
- b. To update the sample size, the branch chief (or designee) enters the information into the RPS/Item Reporting (IR) module for power reactors using the following process:
  1. From the desktop screen, open "Client Server Application" by double-clicking the Icon.
  2. Open the "IR" module by double-clicking on the IR Icon.

3. Verify that the "Power" button is selected in the "Select Docket Type" window. Click "OK."
  4. Select "Topics", "Procedure Status"
  5. Select the appropriate reactor site and inspection report number.
  6. Click "OK" to open the page listing the inspection procedures assigned to the inspection report.
  7. Enter the sample size that was completed for each procedure used during the inspection.
- c. The sample size entered is not cumulative and should represent only those samples actually inspected during the current inspection. (RPS will calculate the cumulative total from the sample entries). Sample sizes are limited to whole numbers. Sample sizes are collected and analyzed by site, although the entry fields in RPS request data by unit. For multi-unit sites, the number of samples inspected for the site should be entered under the first unit. Each inspection procedure defines what constitutes a sample and the minimum sample size that constitutes completion of the procedure. (A summary tabulation of minimum required sample sizes and frequency for each baseline inspection procedure is available in RPS, Dynamic Web Site, ROP, Item 6, "List of ROP Procedures"). The completion status of the procedure remains "Incomplete" until the cumulative minimum sample size has been reached in RPS/IR. When the cumulative completed sample size equals or exceeds the minimum required sample size for the procedure, the branch chief (or designee) updates the status of the procedure to "Complete" as follows.
- d. The completion status of the procedure is updated in RPS/Inspection Planning (IP) using the following process:
1. From the desktop screen, open "Client Server Application" by double-clicking the Icon.
  2. Open the "IP" module by double-clicking on the IP Icon.
  3. Select "Topics", "Create/Update Inspection Plan."
  4. Select the appropriate reactor site.
  5. Click on "ROP Completion Status" tab and select the procedure to be updated. Click on the arrow in the "Status" block for a drop-down menu of status codes. Select the appropriate procedure status based on the number of completed samples and as described further below.

The completion status for inspection procedures that are implemented at a quarterly, semi-annual, and annual frequencies is determined based on the annual requirements for sample size. The completion status for procedures that are implemented at a biennial or triennial frequency is based on the sample size requirements listed in the procedure.

At the beginning of the inspection cycle, all baseline inspection procedures that have an annual completion requirement are assigned a completion status of "Incomplete" and a completed sample size of "0". The procedure status remains as "Incomplete" until the minimum required sample size is inspected. When the minimum sample size has been inspected and reported in RPS/IR as described above, the branch chief (or designee) updates the completion status of the procedure to "Complete."

The status of baseline procedures that have a biennial or triennial frequency must be changed to "N/A" if they are not required to be completed during the inspection cycle. If they are required to be completed during that cycle, the completion status remains as "Incomplete" until the required minimum sample size is reached for the procedure or it is declared "complete".

- e. A procedure can also be declared "Complete" by the branch chief (or designee) with less than the minimum sample size or zero samples completed in the following instances:
  - 1. If all requirements of the procedure are met by work done in other procedure(s) or at related facilities or units. The completion status is entered as "Complete by Reference."
  - 2. Several baseline inspection procedures do not have a specific implementation frequency but are implemented "as required" on an annual basis. The completion status of inspection procedures that are implemented "as required" (e.g., IP 71111.16, Operator Workarounds) are reported as "Complete" when the minimum sample size has been inspected. However, if, at the end of the annual inspection cycle, the minimum sample size was not available to inspect, the procedure status is entered as "Complete - The minimum sample size was not available for inspection during the inspection cycle."
  - 3. Similarly, if the opportunity to apply the procedure was not available during the inspection cycle the procedure status is entered as "Complete - The opportunity to apply the procedure was not available during the inspection cycle."

For these instances the actual sample size that was inspected is to be reported in RPS. If no samples were inspected, "0" is to be entered as the sample size. Once the procedure is declared "Complete," the procedure will be considered 100% complete for program completion purposes (RPS IR Report 8), even though less than the required minimum sample size is reported in RPS.

- f. The procedure completion status codes reported in RPS/IP are defined as follows:
  - 1. Incomplete. All required items identified in the procedure have not been completed. The minimum number of required samples, as defined in the procedure, has not been inspected.
  - 2. Complete. All items identified in the procedure are completed, including inspection of the minimum number of required annual samples. Each procedure defines what constitutes a sample and how many annual samples are required for the given procedure.
    - (a) Complete by Reference. All requirements of the procedure are met by work done in some other procedure(s) or at related facilities (other units). The inspector will not repeat the inspection, but will simply reference the other inspection(s) as the basis for demonstrating that all procedure requirements are completed. For planning and reporting

purposes, the procedure is considered complete for the Completed by Reference facility.

- (b) Complete. The minimum sample size was not available for inspection during the inspection cycle.
  - (c) Complete. The opportunity to apply the procedure was not available during the inspection cycle.
3. Not Applicable. The procedure is not applicable to the specific plant or site. For example; biennial or triennial procedures that are not scheduled during a specific inspection cycle, or procedures applicable only to specific design.
- g. The information on completion status and completed samples entered in RPS is used to track baseline completion for each reactor site and to develop the monthly and annual completion status of the overall baseline inspection program for the ROP (RPS/IR Reports 8 and 9). It is to the region's benefit that the completed sample size and procedure completion status be updated in RPS as soon as possible (within 10 days after the inspection completion date). To ensure accurate and timely reporting and that proper credit is given, the update should not be delayed until the inspection report is issued.

Please note that, in order to preserve the integrity of reports generated after end of year, changing a "Complete" status to "Incomplete" or "N/A" will not be allowed more than 30 days after end of cycle (i.e., after January 30 of the subsequent inspection cycle).

- h. The following examples illustrate how to determine the completion status and sample size.

#### Example 1

The resident inspectors perform a baseline IP that is implemented quarterly requiring the review of twelve samples annually to be considered complete (three samples per quarter). The inspectors review only one sample and plan to review additional samples during the next quarter. The branch chief (or designee) enters a completed sample size of "1" and the status of this IP remains as "Incomplete."

During the next quarter, the resident inspectors review three additional samples. The branch chief (or designee) enters the completed sample size as "3" and the status of the IP remains as "Incomplete." When the cumulative completed sample size reaches "12", the branch chief (or designee) changes the status to "Complete."

#### Example 2

The resident inspectors perform a baseline inspection procedure requiring the review of seven samples to be considered complete. Only five samples meeting the procedure's criteria were available for review during the inspection cycle, but the intent of the inspection was met to the greatest extent practical. At the end of the inspection cycle, or when it is determined that additional samples will not be

available during the inspection cycle, the branch chief (or designee) enters "Complete -The minimum sample size was not available for inspection during the inspection cycle" as the status of this procedure with a sample size of "5".

### Example 3

A baseline inspection procedure that is to be completed "as conditions require" was *not* performed during the annual inspection cycle. If, at the end of the annual cycle there were no opportunities to perform the inspection, the branch chief enters "Complete - The opportunity to apply the procedure was not available during the inspection cycle" as the status of this procedure with a sample size of "0".

- i. The completion status of all baseline procedures, by region or by site, can be obtained in RPS/IR Report 8 by selecting or entering the appropriate parameters requested in the report.

In addition, RPS/IR Report 9 is available to complement the information in RPS/IR Report 8. Report 9 provides a summary of the number of completed samples for all ROP inspection cycles, by site, for all baseline procedures. This summary provides a ready determination of completion for those procedures that have biennial and triennial frequencies. (Please note that prior to the 2003 inspection cycle there was no definitive guidance for the number of samples required for completion nor a clear definition of what constitutes a sample. As a result, the data in these two reports prior to IPC 33 may not be consistent with current numbers and should not be used without confirming their accuracy).

An "Incomplete Procedure Status Report" is available in RPS/IR Report 7. This report lists all procedures that have a status of "Incomplete" or "N/A".

05.04 Charging Time for ROP Activities. Time spent performing activities in support of the ROP is entered into the Human Resource Management System (HRMS) in accordance with the latest guidance promulgated by the Office of the Chief Financial Officer (OCFO), NRR, and your region. The data are uploaded to RPS by the office/regional HRMS coordinator normally on a weekly basis. In order for scheduled activities to appear in the HRMS, schedule updates in RPS must be completed no later than Thursday of the prior week.

- a. Inspection Activities. Table 2 describes the Inspection Program Element (IPE) and activity codes to be used for both direct and indirect inspection efforts associated with performing docket-specific activities under the ROP. IPE codes are used with the inspection procedures to document the type of inspection performed (i.e., use BI for baseline inspection procedures). Activity codes are used to charge indirect inspection activities to the inspection report. Table 2 is intended to be all-inclusive (i.e., the only codes to be used) for any inspection-related activities necessary to support the ROP; therefore, the table also includes several preexisting IPE and activity codes. Note that time must be reported accurately because the licensees are billed on the basis of the reported data. Inspection hours should be charged to the specific unit on which the inspection was performed. In addition, NRC analyses of the reported data are used for further program refinements and budget formulation.

- b. Assessment Activities. As described in Table 2, all assessment related effort is charged to the "ASM" activity code. This should include time spent preparing for and conducting all assessment activities, (including quarterly, mid-cycle, and end-of-cycle reviews), as well as any ongoing assessment activities. An annual inspection report number (as defined in Section 05.05) is reserved for each plant at the beginning of the IPC, and all assessment effort associated with the given plant throughout the year should be charged to that report number. The assessment report number reserved for each plant is based on the year of the next annual end-of-cycle assessment letter (i.e., the Annual Assessment letter for CY2002 would be 05000###/2003001). Separate report numbers should *not* be reserved for assessment followup letters or the mid-cycle letter.

05.05 Inspection Report and Item Numbering

- a. All reports and letters for a given unit shall be uniquely numbered using the RPS Inspection Report Tracking System (IRTS) module to allow for clear, simple tracking. Each report or letter should be classified by type using the available drop down menu (i.e., Annual Assessment, Assessment Follow-up, Team, Final Significance Determination letter, etc.)

- 1. The first report number for each year shall be the Annual Assessment letter of the previous year and each subsequent letter or report shall be numbered sequentially. The numbering should take the following format:

05000###/YYYY\*\*\*

where ### is the docket number, YYYY is the year, and \*\*\* is the sequential report number. (i.e., The Annual Assessment letter for CY2002 would be 05000###/2003001.)

- 2. Every inspection report, final significance determination letter, and supplemental inspection report should also be given a report number. The numbers should be the next available number for the given site and will be used to track issues from initial finding through final closeout.

- b. Inspection Report Item Numbering

- 1. A sequence number is required for each item identified in the inspection report, including each of the five type codes- violation (VIO), non-cited violation (NCV), apparent violation (AV), finding (FIN), and unresolved item (URI). For all licensed facilities, the sequence number for items identified in an inspection report consists of the item type followed by the docket number, the inspection report number, and a 2-digit sequence number (\$\$) in the following format:

<type> 05000###/YYYY\*\*\*-\$\$

Examples of inspection report item numbers are  
URI 05000346/2000004-01, FIN 05000285/2001003-02, and  
VIO 05000443/2000301-03.

2. The sequence number begins with "01" for the first item identified in the report and each subsequent item identified is numbered in sequence, regardless of type. In a report covering only one unit, each item is tracked separately. Items common to two or more units will have the same sequence number for each unit; the docket number and the associated inspection report number distinguish the unit to which the item applies. A sequence number shall be unique for each distinct inspection finding.

The following examples illustrate proper sequence numbering for single- and dual-unit sites:

Sequence Numbering for Single-Unit Site				
Item	Docket	Report	Seq.#	Remarks
1 <sup>st</sup> VIO	05000346	2001001	01	
1 <sup>st</sup> URI	05000346	2001001	02	
2 <sup>nd</sup> VIO	05000346	2001001	03	
1 <sup>st</sup> FIN	05000346	2001001	04	
Sequence Numbering for Dual-Unit Site				
1 <sup>st</sup> URI	05000295	2001002	01	1 <sup>st</sup> unit 1 item
2 <sup>nd</sup> URI	05000304	2001002	02	1 <sup>st</sup> unit 2 item
1 <sup>st</sup> FIN	05000295	2001002	03	both units
	05000304	2001002	03	
2 <sup>nd</sup> FIN	05000295	2001002	04	
1 <sup>st</sup> VIO	05000295	2001002	05	both units
	05000304	2001002	05	

3. URIs that are later determined to be VIOs or FINs are assigned a new item number based upon the inspection report that documents the resolution of the URI. The original URI item is then closed in that inspection report.
  - c. When a report or letter mentions an individual item, that report or letter shall be associated with the given item in the PIM. Following the issuing of a report or letter, PIM entries should be created or updated for each item mentioned. A new PIM entry must be created for each new item identified in an inspection report. When an inspection report follows up on an existing item, the PIM text must be updated to reflect the new information, and the report or letter should be associated with the item using the assigned report number.

## 05.06 Entering Inspection Findings into the Plant Issues Matrix (PIM)

- a. The PIM provides a consolidated listing of individual plant issues (i.e., inspection findings) that the NRC uses to assess plant performance. All entries in the Summary of Findings of the inspection reports and all issues given an item number are entered into the PIM. The PIM shall be updated within 14 days after the issuance of the report. PIM entries are the vital link between inspection reports and information posting to the ROP Web page. In order to ensure information posted to the Web is accurate, PIM entries must be timely and complete.

Inspection findings are entered into the PIM via the RPS Item Reporting (RPS/IR) module. A typical PIM entry includes the type, title, cornerstone, significance determination, event date, who identified the finding, item description and significance description, source document (normally the inspection report number), and a brief summary of corrective actions planned or completed. Appendix A to this guidance provides field-by-field guidance for entering inspection findings into the PIM through the RPS/IR module.

### b. Special Cases and Examples

1. Unresolved Items (URIs). URIs are documented in the body of an inspection report and assigned a tracking number in accordance with IMC 0612. URIs are entered into RPS under the applicable cornerstone, with a type code of "URI," and a significance determination of "TBD". The user will need to remove the check from the "PIM List" box so that they are not included on the Plant Inspection Findings Web page, or considered in the assessment process. (See Appendix A of this manual chapter.)
2. Significance to Be Determined. Issues for which the NRC staff has not yet finalized either the significance or the enforcement determination when the IR is issued are categorized in RPS as "TBD" in the significance determination field. The cornerstone is designated and the type code is "URI" or "AV," as applicable.

After the SDP and Enforcement Review Panel determines the final risk characterization and sends a letter to the licensee regarding this characterization, the URI or AV is then closed, and a VIO or FIN is issued under a new item number based on the inspection report that documents the resolution of the URI. In any case, text is added to the original PIM entry to describe the changes that have occurred.

3. Cross Cutting Issues. Findings related to cross-cutting issues or problem identification and resolution (PI&R) that are identified during routine baseline inspections and documented in inspection reports are in the PIM as part of the entry for the associated inspection finding. For each inspection finding, cross-cutting issues can be identified by checking the appropriate box for the issue. (See Appendix A of this manual chapter.) Conclusions made on PI&R effectiveness resulting from these routine inspections are not included in the PIM, except to the extent that they are associated with an individual inspection finding or contribute to a significant cross-cutting finding. However, a summary conclusion regarding the effectiveness of the PI&R

program resulting from the biennial PI&R inspection (IP 71152B) is entered into the RPS/IR under the Miscellaneous cornerstone as type code FIN with N/A as the significance.

4. Performance Indicator (PI) Verification Issues. Issues related to PI verification are documented in the PIM only if correcting the data causes or would have caused the PI to cross a threshold. Such issues are documented in the PIM with “Miscellaneous” for the cornerstone, “VIO” or “NCV” for the type code, and the severity level of the violation for the significance determination. Each PI verification issue is a separate PIM entry.
  5. Supplemental Inspection Results for PIs. Issues from supplemental inspections that were conducted in response to a PI that crossed a threshold are entered in the PIM under the applicable cornerstone, with “FIN” for the type code and “N/A” for the significance determination. These issues are not assigned the color of the PI that was crossed; this prevents inadvertent double-counting. Any additional inspection findings identified during the supplemental inspection beyond the scope of the original issue(s) are entered in the PIM as separate entries in accordance with the relevant portions of this guidance.
  6. Supplemental Inspection Results for Inspection Findings. A paragraph summarizing the results of a supplemental inspection performed to address a White or greater inspection finding is added to the original PIM entry for the original inspection finding. The supplemental inspection report number is added to the Source field. Additional inspection findings identified during the supplemental inspection beyond the scope of the original finding(s) are entered in the PIM as separate entries, in accordance with the relevant portions of this guidance.
  7. Independent Items. In the RPS/IR module, under “Topics” the “Independent Items” are used to track information from sources other than inspection reports. The regions should use the Independent Item feature of the RPS/IR module to track licensee event reports (LER), issues identified under 10 CFR Part 21, and other items; however independent items are not included in the PIM because PIM entries are limited to “Report Items.” Any significant issue(s) that did not originate in an IR must be discussed and referenced in the next resident report and then entered into the PIM if the NRC will use the issue(s) to assess plant performance (as in the investigation of a harassment and intimidation case by the NRC’s Office of Investigation). However, the NRC staff shall take care to ensure that previously undocketed information that was not intended for public release is not introduced into the inspection reports and the PIM.
- c. Producing PIM Reports. Under the ROP, RPS/IR Report 4, “ROP PIM Report,” may be used to request a PIM report by site, docket, or region for a specified time period. By default, PIM reports are sorted by cornerstone and the time frame is from the day the report is requested back a full year; however users may select different sorting criteria and time frames.

A report is generated from RPS and posted to the Plant Inspection Findings Web page. Old style PIM reports can still be obtained using RPS/IR Report 3, "PIM Report," for inspection findings for any site and time period prior to initial implementation of the ROP (before April 2000). Additionally, the RPS Dynamic Web Site provides numerous categorized reports.

- d. Plant Inspection Findings Web page. The information in the PIM is used to generate a summary of inspection findings used to assess plant performance. The Plant Inspection Findings Web page displays this summary, the current applicable findings for each plant. This Web page is the subset of the PIM actually used to assess plant performance and includes all issues designated as VIO, FIN, or AV as well as NRC identified and self revealing NCVs. The information available on the Plant Inspection Findings Web page and Performance Indicators Web page should summarize all of the information used for plant assessment and a plant's subsequent placement in the Action Matrix.

#### 05.07 ROP Web Posting Process and Schedule

- a. Performance Indicators. Licensees submit PI data to the NRC on a quarterly basis in accordance with NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," which the NRC endorsed in Regulatory Issue Summary (RIS) 00-08, "Voluntary Submission of Performance Indicator Data," and subsequent revisions and endorsements. Licensees submit quarterly PI data to the NRC within 21 days following the end of the reporting period. Specifically, the reporting periods are the four quarters within a calendar year (i.e., Q1 is January 1 - March 31, Q2 is April 1 - June 30, Q3 is July 1 - September 30, and Q4 is October 1 - December 31).

Within 2 business days after receiving of the licensees' data transmissions, the NRC posts the PI data, indicator values, and associated graphs on the agency's internal ROP Web page to give internal stakeholders an opportunity to become familiar with the PIs and to identify any obvious errors prior to public release. As a second-stage dissemination, 35 days following the end of each quarter, the NRC places the PIs on the agency's external ROP Web page to make them available to external stakeholders along with the latest inspection findings, as discussed below. In addition, licensees are expected to submit changes to PI data as soon as practical, but no later than the end of the quarter, following discovery of an error especially when that error causes a threshold to be crossed. The NRC then updates the ROP Web page accordingly following receipt of the corrected PI data.

- b. Inspection Findings. The regions are responsible for entering inspection reports into ADAMS in accordance with the ADAMS template. The regions also update the PIM in RPS to reflect the latest inspection findings in accordance with this manual chapter. In order to support posting these documents to the ROP Web page, inspection reports must be entered into ADAMS as ".pdf" files and should be placed in the applicable site subfolder within the Power Reactor Correspondence folder. The IIPB then copies all issued inspection reports from ADAMS to the Q:\ drive for posting to the Web server in accordance with branch operating procedures.

The latest available PIM entries (from the RPS/IR module) and inspection reports (from ADAMS) are posted to the ROP Web page along with the related PIs

35 days after the end of each quarter and 60 days following the end of each quarter. The purpose of the second posting is to include any newly issued inspection reports from late in the previous quarter so that the ROP Web page reflects a complete picture of PIs and inspection findings from the previous quarter in a timely manner. In addition, PIM entries and related inspection reports that reflect a change in color designation are posted as soon as practical after the docketed information becomes available. These updates include the final significance determination that resulted in a risk significance that is more than very low significance (i.e., white, yellow, or red) or a final enforcement decision that resulted in a notice of violation being issued.

- c. Action Matrix Summary (AMS). Each region submits a quarterly email message, in accordance with Table 3 detailing the AMS column assignments for all plants in the region using the guidance in IMC 0305 and the information available on the ROP Web page. This email message is due to IIPB on or before the 30<sup>th</sup> day following the end of each calendar quarter. Email messages should be sent to [PIPBCAL@nrc.gov](mailto:PIPBCAL@nrc.gov). Using this input, IIPB then posts the AMS to the ROP Web page. The basis submitted by each region serves as the footnote on the AMS to explain each plant that does not appear in the Licensee Response column.

In addition to quarterly inputs, regional staff submit the ROP AMS column assignment and basis changes any time they reach a final determination or obtain clarifying information affecting a plant and its placement in the ROP AMS. Before submitting this new information, the regional staff should promptly update the PIM entries so that information can be verified and included on the ROP Web page.

- d. Assessment Letters and Inspection Plans. Similar to the inspection reports, the regions are responsible for entering assessment letters and inspection plans into ADAMS in accordance with the ADAMS template. In order to support posting these documents to the ROP Web page, these documents must be entered into ADAMS as “.pdf” files and should be placed in the site subfolder within the Power Reactor Correspondence folder. Additionally, all issued assessment letters and inspection plans are sent to [RidsNrrDipmlipb@nrc.gov](mailto:RidsNrrDipmlipb@nrc.gov) for transfer to the Q:\ drive and posting to the Web server in accordance with branch operating procedures.

The assessment letters and inspection plans are typically posted to the ROP Web page 70 days following the end of the reporting period. In accordance with IMC 0305, Mid-Cycle letters and Annual Assessment letters are issued for all plants approximately 9 weeks after the completion of the second and fourth calendar quarters respectively. These letters have inspection plans (RPS/IP report 22) attached to provide a schedule of NRC inspections for approximately the next year, as specified in IMC 0305. Assessment Follow-up letters are issued approximately 7 weeks after the completion of the first and third calendar quarters only for those plants that crossed performance thresholds. Assessment Follow-up letters do not include updated inspection plans, although they may note any inspection plan changes associated with forthcoming supplemental inspections.

- e. ROP Web Page Updates and Schedule. Table 4 provides a schedule summarizing the planned updates to the ROP Web page. The ROP Web page will also be updated on an “as needed” basis to correct any discrepancies or noted

omissions in previously posted information. For example, the inspection findings and/or PIM would be updated to reflect a final significance determination that resulted in a risk significance that is more than very low significance (i.e., white, yellow, or red) or a final enforcement decision that resulted in a notice of violation. Similarly, the ROP Web page would be updated to reflect performance indicators based on a licensee's PI change submittal that caused a threshold to be crossed.

END

TABLES:

- Table 1: Baseline Inspection Procedures in the RPS/IPAS Module
- Table 2: IPE and Activity Codes for the ROP
- Table 3: Example Action Matrix Summary Assignment Email Message
- Table 4: ROP Web Posting Timeline

APPENDIX

- Appendix A: Detailed Guidance for PIM Entries Through the RPS/IR Module Table 1.

Table 1. Baseline Inspection Procedures in the RPS/IPAS Module

IPAS No.	IP No.	IPAS TITLE
71111 Reactor Safety—Initiating Events, Mitigating Systems, Barrier Integrity		
7111101	71111.01	Adverse Weather Protection
7111102	71111.02	Evaluations of Changes, Tests, or Experiments
Note 1	71111.03	Not Used (Reserved)
7111104 (Note 2)	71111.04	Equipment Alignment (Quarterly)
7111104S		Equipment Alignment (Semiannual)
7111105Q	71111.05	Fire Protection (Quarterly)
7111105A		Fire Protection (Annual)
7111105T		Fire Protection (Triennial)
7111106	71111.06	Flood Protection Measures
7111107A	71111.07	Heat Sink Performance (Annual)
7111107B		Heat Sink Performance (Biennial)
7111108	71111.08	Inservice Inspection Activities
Note 1	71111.09	Not Used (Reserved)
Note 1	71111.10	Not Used (Reserved)
7111111Q	71111.11	Licensed Operator Requalification Program (Quarterly)
7111111B		Licensed Operator Requalification Program (Biennial)
7111112Q	71111.12	Maintenance Effectiveness (Quarterly)
7111112B		Maintenance Effectiveness (Biennial)
7111113	71111.13	Maintenance Risk Assessments and Emergent Work Evaluation
7111114	71111.14	Personnel Performance During Nonroutine Evolutions
7111115	71111.15	Operability Evaluations
7111116	71111.16	Operator Workarounds
7111117A	71111.17	Permanent Plant Modifications (Annual)
7111117B		Permanent Plant Modifications (Biennial)
Note 1	71111.18	Not Used (Reserved)
7111119	71111.19	Post Maintenance Testing

Table 1. Baseline Inspection Procedures in the RPS/IPAS Module

<b>IPAS No.</b>	<b>IP No.</b>	<b>IPAS TITLE</b>
7111120	71111.20	Refueling and Outage Activities
7111121	71111.21	Safety System Design and Performance Capability
7111122	71111.22	Surveillance Testing
7111123	71111.23	Temporary Plant Modifications
<b>71114 Reactor Safety—Emergency Preparedness</b>		
7111401	71114.01	Exercise Evaluation
7111402	71114.02	Alert and Notification System Testing
7111403	71114.03	Emergency Response Organization Augmentation
7111404	71114.04	Emergency Action Level and Emergency Plan Changes
7111405	71114.05	Correction of Emergency Preparedness Weaknesses and Deficiencies
7111406	71114.06	Drill Evaluation
<b>71121 Occupational Radiation Safety</b>		
7112101	71121.01	Access Control to Radiologically Significant Areas
7112102	71121.02	ALARA Planning and Controls
7112103	71121.03	Radiation Monitoring Instrumentation
<b>71122 Public Radiation Safety</b>		
7112201	71122.01	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems
7112202	71122.02	Radioactive Material Processing and Transportation
7112203	71122.03	Radiological Environmental Monitoring Program (REMP)
<b>71130 Physical Protection</b>		
7113001	71130.01	Access Authorization (AA) Program (Behavior Observation Only)
7113002	71130.02	Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorization)
7113003	71130.03	Response to Contingency Events (Protective Strategy and Implementation of Protective Strategy)
7113004	71130.04	Security Plan Changes
<b>Other Baseline Procedures</b>		

Table 1. Baseline Inspection Procedures in the RPS/IPAS Module

IPAS No.	IP No.	IPAS TITLE
71150	71150	Discrepant or Unreported Performance Indicator Data
71151	71151	Performance Indicator Verification
71152	71152	Identification and Resolution of Problems
71153	71153	Event Follow-up
<p>NOTES:</p> <p>(1) IP71111 attachment numbers .03, .09, .10, and .18 are reserved but not currently used.</p> <p>(2) IP7111104 does not have the "Q" suffix to indicate a quarterly frequency because labor hours were already charged and scheduled for the quarterly portion of this IP.</p>		

Table 2. IPE and Activity Codes for the ROP

CODE	ACTIVITY TITLE	DESCRIPTION
<b>Inspection Program Element (IPE) Codes</b>		
BI	Baseline Inspection	Time spent conducting baseline inspection activities (per IMC 2515, Appendix A)
AF	Allegation Follow up	Time spent conducting inspections to investigate alleged safety concerns (i.e., allegations)
ER	Event Response Inspection	Time spent conducting follow up activities in response to an event (beyond the scope of IP 71153), such as an AIT or special inspection (per IP 93800 or 93812)
OA	Other Activities (Routine)	Time spent conducting infrequently performed inspections that are not part of the baseline or supplemental inspection program elements (per IMC 2515, Appendix C) (Note that IP 93800 and 93812 should be charged to ER - Event Response.)
SI	Generic Safety Inspection	Time spent conducting safety issues inspections, which are one-time inspections of specific safety issues, typically conducted in accordance with temporary instructions
SP	Supplemental Program	Time spent conducting supplemental inspection activities (per IMC 2515, Appendix B)
<b>Activity Codes</b>		
AFT	Allegation Follow up Travel	Time spent traveling to and from nuclear facilities to investigate alleged safety concerns (i.e., allegations); travel to support inspections that cover both allegation- and non-allegation-related activities are charged to AT.
ASM	Assessment	All time spent evaluating assessment inputs (PIs and SDP results) and determining necessary follow up action as described in IMC 0305 (i.e., quarterly, mid-cycle, and end-of-cycle activities); this includes time spent developing inspection schedules and preparing assessment letters, as well as any effort required to support the agency action review meeting or subsequent Commission briefing.
AT	Inspection Related Travel	Time spent traveling to and from nuclear plants to support licensee inspections (not including allegation follow up).
BID	Baseline Inspection Documentation	Time spent documenting the results of baseline inspections, writing inspection reports, and updating the PIM. Time spent preparing for and conducting the exit meeting is considered part of documentation for the inspection per IMC 2515.

Table 2 IPE and Activity Codes for the ROP

CODE	ACTIVITY TITLE	DESCRIPTION
BIP	Baseline Inspection Preparation	Time spent preparing for baseline inspections; preparation may occur before or during an inspection, including making adjustments to the baseline inspection plan based on emergent issues. Time spent preparing for and conducting the entrance meeting is considered part of preparation for the inspection per IMC 2515.
BJ2	Allegation Follow-up Prep/Doc	Time spent preparing for <i>and</i> documenting the results of allegation-related inspections or OI investigations.
COM	Routine Communication	Time spent by an SRI/RI in non-inspection-related activities that do not fit the intent of "Plant Status," including drop-in visits by plant management, tours with NRC management, and other activities not described in Appendix D to IMC 2515.
ENF	Enforcement	Time spent processing inspection findings under the revised enforcement policy. This includes both violations under the new policy and non-SDP enforcement effort.
GID	Generic Safety Inspection Documentation	Time spent documenting the results of safety issues (SI) and infrequently performed inspections (OA). Activities include exit meeting, writing inspection reports and updating the PIM.
GIP	Generic Safety Inspection Preparation	Time spent preparing for safety issues (SI) and infrequently performed inspections (OA). Preparation may occur before or during an inspection and includes preparation for and conducting the entrance meeting.
PS	Plant Status	Time spent by an SRI/RI in gathering and analyzing information regarding current plant status and ongoing activities that are directly applicable to inspection planning. This includes control room and plant walkdowns, attendance at licensee status meetings, and entrance and exit meetings for inspections conducted by regional and headquarters inspectors.
REG	Regional Support	Time spent providing non-direct inspection support of an ongoing inspection; this code is primarily used by region-based inspectors to charge in-office reviews in response to technical questions (i.e., operability determination, 50.59 reviews), but does not include in-office <i>direct</i> inspection effort (DIE) that is specifically recognized in an IP (i.e., EAL revision review)
RLD	Generic Review of Technical Documents	Time spent by regional staff reviewing generic documents to determine applicability to specific inspections

Table 2 IPE and Activity Codes for the ROP

CODE	ACTIVITY TITLE	DESCRIPTION
SDP	Significance Determination Process	Time spent evaluating the significance of all inspection findings using the significance determination process (Phase 2 and 3 only); this includes Senior Reactor Analyst efforts to address any plant/inspection-specific issues, but Phase 1 time is charged as DIE to the IP being used
SEP	Supplemental/Event Response Inspection Preparation	Time spent preparing for supplemental (SP) or event response (ER) inspections. Preparation may occur before or during an inspection and includes preparation for and conducting the entrance meeting.
SED	Supplemental/Event Response Inspection Documentation	Time spent documenting the results of supplemental (SP) or event response (ER) inspections, exit meetings, writing inspection reports, and updating the PIM

Table 3. Example Action Matrix Summary Assignment Email Message

Regional emails should account for all plants in the region.

Part I:

Licensee Response column:

Arkansas Nuclear 1

Arkansas Nuclear 2

etc...

Part II:

Point Beach 1 is in the Regulatory Response column due to one White inspection finding in the Emergency Preparedness Cornerstone originating in 2Q2002. Additionally, the one Red inspection finding in the Mitigating Systems Cornerstone originating in 4Q2001 is being considered as an Old Design Issue in accordance with IMC 0305, and is not considered as an input to the Assessment Program.

Vermont Yankee is in the Degraded Cornerstone column due to one Yellow inspection finding in the Physical Protection Cornerstone originating in 3Q2001. This finding is being held open, in accordance with IMC 0305, for greater than 4 quarters because (*...give details from the correspondence to licensee describing the extension on the inspection finding*).

Oconee 1 is in the Multiple/Repetitive Degraded Cornerstone column due to one White PI in the Mitigating Systems Cornerstone, one White inspection finding in the Mitigating Systems Cornerstone originating in 3Q2002, and one White inspection finding in the Barrier Integrity Cornerstone originating in 2Q2002. Additionally, in accordance with IMC 0305, the staff plans to deviate from the ROP Action Matrix to implement regulatory actions described in the Degraded Cornerstone column per the assessment followup letter dated October 9, 2002.

Table 4. ROP Web Posting Timeline

<b>Information</b>	<b>Days following the end of the calendar quarter</b>
Licensees submit Performance Indicators	21 days
Performance Indicators on internal Web site	23 days
Regions submit email message concerning Action Matrix Summary assignments for all plants and the basis for each plant not in the Licensee Response column	30 days
Performance Indicators, available PIM entries, inspection reports, and Action Matrix Summary on external Web site	35 days
PIM and IR update to complete posting of <b>all</b> inspection findings for the previous quarter's	60 days
Assessment Letters (EOC, mid-cycle, or quarterly followup) on external Web site	70 days

## APPENDIX A

### DETAILED GUIDANCE FOR PIM ENTRIES THROUGH THE RPS/IR MODULE

1. Type. Select the “Type” from the pull down menu. The choices include the five item types under the reactor oversight process (ROP), as well as related comments, as follows:
  - VIO (Violation)
  - NCV (Non-Cited Violation)
  - AV (Apparent Violation)
  - URI (Unresolved Item)
  - FIN (Finding)

For issues involving licensee event reports (LERs) reporting concerns under Title 10, Part 21, of the *Code of Federal Regulations* (10 CFR Part 21) and other items of interest to be tracked that are not associated with inspection findings, use the “Independent Item” button on the tool bar and enter the data as discussed in paragraph 05.06(b)(7).
2. PIM List. This box is automatically checked by default, indicating that the issues are intended to be included in the printed PIM and posted to the Plant Inspection Findings Web page. Click the box to remove the check for items that are **not** intended to be published. Only issues designated VIO, FIN, and AV as well as NCVs that are NRC identified and self revealing should be included.
3. Title. Enter a concise but descriptive title for the entry. This title is automatically printed on the PIM report above the “Item Description/Significance” column for each entry. The title should be concise to highlight key aspects and provide a quick synopsis of the issue. A good rule of thumb would be to limit of the title to fit on one line of the printed PIM (about 80 characters).
4. Type Specific. Enter the information as prompted based on the “Type” selection (i.e., severity level, EA case number, etc.). This information will not print on the PIM report or appear on the Plant Inspection Findings Web page.
5. Cornerstone. Select the “Cornerstone” from the pull-down menu. The choices include the seven cornerstones (in alphabetical order) and “Miscellaneous,” as follows:
  - Barrier Integrity
  - Emergency Preparedness
  - Initiating Events
  - Mitigation Systems
  - Occupational Radiation Safety
  - Physical Protection
  - Public Radiation Safety
  - Miscellaneous. The “Miscellaneous” cornerstone should be used for entries that are cross-cutting issues or don’t fit clearly into one of the seven cornerstones.

Examples include a summary conclusion from the annual problem identification and resolution inspection, PI verification issues, and traditional enforcement (compliance) issues that are not directly tied to a cornerstone as discussed in this manual chapter.

6. Significance Determination. Select the “Significance Determination” from the pull-down menu. The selection should reflect the significance color for issues processed through the Significance Determination Process (SDP), or the severity level of a violation for a non-SDP issue. Most inspection findings are evaluated through the SDP to assess safety significance and determine the appropriate regulatory response. As a result of the final SDP determination, the item is assigned one of the following colors in increasing order of its significance:

- Green (very low safety significance)
- White (low to moderate safety significance)
- Yellow (substantial safety significance)
- Red (high safety significance)

Where appropriate, select one of the following “Significance Determination” values:

- “N/A” is used for entries that are not evaluated for their significance. Examples include summary conclusions from the annual problem identification and resolution inspection and PI verification issues.
- “TBD” is used for entries when the NRC staff has not yet determined the final significance and further evaluation is necessary. Examples include preliminary findings that have not yet completed the SDP process and have not yet been assigned final SDP determinations as discussed in paragraph 05.06(b)(1) & (2).

Not all entries are evaluated using the SDP, such as violations of regulatory requirements that impede the agency’s ability to regulate. Examples of these types of items include violations of 10 CFR 50.5, “Deliberate Misconduct”; 50.7, “Employee Protection”; 50.9, “Completeness and Accuracy of Information”; and 50.73, “Licensee Event Report System.” For those items and similar violations of regulatory requirements, enter the severity level of the violation in the “Significance Determination” field:

- SL-I (Severity Level I violations)
- SL-II (Severity Level II violations)
- SL-III (Severity Level III violations)
- SL-IV (Severity Level IV violations)

Issues that are run through the SDP as violations of regulatory requirements are assigned the “colored” significance in the “Significance Determination” field. (It is not important to assign a severity level to violations of regulatory requirements that are processed through the SDP.)

7. Cross-Cutting Area. In addition to selecting the cornerstone as noted above, instances may arise where findings also affect one or more of the cross-cutting areas of the ROP. As applicable, check the boxes corresponding to the affected cross-cutting area(s) as follows:
- Safety Conscious Work Environment
  - Human Performance
  - Problem Identification and Resolution

This information will not print on the PIM report or on the Plant Inspection Findings Web page, but may be used for planning and assessment purposes.

8. Identified by. Select the applicable choice from the pull-down menu, as follows:
- NRC
  - Licensee
  - Self Disclosing

Issues are considered “NRC identified” only if they were not self revealing, were not previously identified by the licensee, or were not resolved by the licensee’s corrective actions. “Self Disclosing” refers to issues that are initiated by an occurrence or action that independently revealed the issue, rather than as a result of a licensee or NRC initiative. Examples include misaligned valves identified during a surveillance test required by the plant’s technical specifications, modification errors that are not identified until an actual system demand occurs, etc.

9. Sequence Number. The RPS/IR module will assign a sequential number to each issue as it is entered into the system as described in Paragraph 05.05(b)(1) & (2) of this manual chapter. To avoid unnecessary rework, it would be prudent to enter the items into the RPS/IR module in the same order as they are listed in the inspection report. If necessary, the sequence number should be modified by moving the cursor to this field and correcting the number to match the sequence number in the inspection report. This information is used to generate the “Item Source” field, and will print on the PIM report in the “Source” field.
10. IR Reference Number. Enter the paragraph number from the body of the inspection report where this issue is described in detail. This information will not print on the PIM report.
11. Event Date. Enter the event date in the “Event Date” field. This date is the exit date of the inspection which in most cases should correspond to the end of the pertinent inspection period in which the finding was identified.
12. Fill in the remaining fields on the Status and Procedures screens. The “Item Source” field is generated to include the inspection report number and the two-digit item number, separated by a hyphen. Each entry in the RPS/IR module will need to be assigned to at least one inspection procedure (“N/A” and “None” are also valid choices). In addition, be sure to select the applicable dockets/units to enable sorting and reporting by both site and docket number.

13. Item Description/Significance. Enter a brief description of the Issue. In general, the description of the issue should come directly from the Summary of Findings in the inspection report, with minor exceptions. Details on developing the Summary of Findings are included in IMC 0612. The color of the finding (which starts the discussion in the Summary of Findings) and the referenced section of the report (which ends the Summary of Findings discussion) should not be included in the text of the entry.

In most cases, the user will copy and paste directly from the Summary of Findings of the inspection report; however, the RPS/IR module does allow modification of the text. Changes made should be minimal in order to ensure close agreement between the PIM and Summary of Findings. In rare instances, if the Summary of Findings is found to be unclear after the inspection report is issued, the entry in the PIM may be edited to clarify the issue, with the goal of improving reader's ability to understand the issue. However, only information contained in the body of the report can be used. Care should be taken to ensure that new or undocketed information is not inadvertently introduced into the RPS/IR module. Any changes of content are included within brackets, [ ], to clearly show the editing. At the region's discretion, it may be necessary to reissue an IR to clarify the Summary of Findings if the entry and Summary of Findings do not closely agree.

For numbered items outside the summary of findings, a similar summary of the issue should be developed from the details of the report.

Users should refrain from using any special characters and symbols that may have specific meaning in the HyperText Markup Language (HTML) used to post the data to the Web. Instead, use the words that describe the symbol (i.e., use "less than" to denote "<" and "greater than" to denote ">").

14. Status. The initial status of an issue is "open". All issues remain active for assessment for four quarters regardless of the status of the issue. An issue can remain active (i.e., appear on the Plant Inspection Findings Web page) greater than four quarters if the status remains "open".

END