

NRC INSPECTION MANUAL

CCIB

MANUAL CHAPTER 0613

DOCUMENTING 10 CFR PART 52
CONSTRUCTION AND TEST INSPECTIONS

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Appendix A – Acronyms Used in IMC 0613

Appendix B – Guidance for the Use of the Construction Inspection Program Information Management System (CIPIMS) for Documenting Inspections and Developing Inspection Reports

Attachment 1 – Construction Findings Flowchart

Attachment 2 – Revision History

0613-01 PURPOSE

To provide guidance for documenting power reactor construction and testing inspection activities that are conducted under the 10 CFR Part 52 licensing process. Guidance is provided to include inspection report content, format, and style for reports generated as a result of inspections conducted under Inspection Manual Chapter (IMC) 2503, "Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work" and IMC 2504, "Construction Inspection Program - Non-ITAAC Inspections."

0613-02 OBJECTIVES

02.01 To ensure that inspection reports:

- a. Clearly communicate inspection results to licensees, NRC staff, the public and applicable stakeholders.
- b. Provide documentation of inspection activities to support ITAAC findings and NRC conclusions of ITAAC completion.
- c. Provide documentation of the bases for evaluations concerning the effectiveness of the programs or activities inspected.
- d. Provide bases for periodic assessments.
- e. Provide a basis for any required enforcement action.

02.02 To ensure that inspection report preparation and review activities:

- a. Clearly designate individual responsibilities.
- b. Identify the expected deliverables that will result from the inspection effort.

0613-03 DEFINITIONS

The following terms are applicable for the purpose of documentation. This section attempts to minimize repeating terms defined in associated construction manual chapters or the NRC Enforcement Manual.

03.01 Applicant. A person or entity applying for a license, permit, certification or other form of Commission permission or approval under 10 CFR Part 50 or 10 CFR Part 52.

03.02 Closed Item. A matter previously reported as a noncompliance, an inspection finding (e.g., ITAAC-Related Construction Finding, construction finding, or ITAAC finding), or a licensee identified item (e.g., Part 21 report, construction deficiency report or licensee event report,) that the inspector concludes has been satisfactorily resolved based on information reviewed during the current inspection.

03.03 Conclusion. As used in this manual chapter, an assessment that relates one or more observations to the broader context of a licensee program or process.

03.04 Construction Activities. An NRC-regulated activity associated with the design, fabrication, construction, or testing of structures, components, subcomponents, subsystems, or systems at the construction site.

03.05 Construction Deficiency. As described in 10 CFR 50.55(e)(i), a reportable defect or failure to comply that could create a substantial safety hazard, were it to remain uncorrected.

03.06 Construction Finding. A finding that is considered a greater-than-minor non-compliance with regulatory requirements or licensee commitments and is not associated with a specific ITAAC.

03.07 Construction Inspection Program Information Management System (CIPIMS). The database that provides the means to document, report, and track NRC inspection activities and their results.

03.08 Contractor. Any organization or individual under contract to furnish items or services to a licensee engaging in an NRC-regulated activity. It includes the terms consultant, vendor, supplier, fabricator, constructor, and sub-tier levels of these organizations.

03.09 Escalated Enforcement Action: A notice of violation for any Severity Level I, II, or III violation that may include a civil penalty.

03.10 Family of ITAAC. A grouping of ITAAC that are related through similar construction processes, resulting products, and general inspection attributes.

03.11 Inspection. (1) An NRC activity consisting of examination, observation, or measurement to determine applicant/licensee/contractor/vendor conformance with requirements and/or standards. (2) Applicant/licensee/contractor/vendor quality control measures consisting of examination, observation, or measurements to determine the conformance of materials, supplies, components, parts, systems, processes or structures to pre-determined quality requirements.

03.12 Inspection Document. Any material obtained or developed during an inspection that is considered to be an NRC record. (Inspectors should review IMC 0620, "Inspection Documents and Records," for clarification on how materials become agency records.)

03.13 Integrated Inspection Reports. A construction inspection report that combines observations from all inspections (resident, regional, etc.) conducted during a specific time period.

03.14 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). Those inspections, tests, analyses, and acceptance criteria identified in the combined license

that if met are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will operate in conformity with the license, the provisions of the Atomic Energy Act, as amended, and the Commission's rules and regulations. The ITAAC identified in a combined license referencing a certified design will include the ITAAC defined in the Tier 1 documentation. Site-specific ITAAC, which include emergency planning ITAAC and ITAAC that are not part of the certified design, will also be included in a combined license. ITAAC are conditions of the license and must be satisfactorily completed before an affirmative 10 CFR 52.103(g) finding can be made.

03.15 ITAAC Finding. A regulatory violation that is greater-than-minor, is associated with a specific ITAAC for which the licensee has submitted the ITAAC closeout letter, and is material to the ITAAC acceptance criteria. This type of finding could prevent the ITAAC from being closed out by the NRC and could require that previously closed ITAAC be re-opened. An ITAAC finding may be related to a single ITAAC or a family of ITAAC.

03.16 ITAAC-Related Construction Finding. A regulatory violation that is greater-than-minor, is associated with a specific ITAAC for which the licensee has not yet issued the ITAAC closeout letter, and is material to the ITAAC acceptance criteria. This type of finding could prevent the ITAAC from being closed out and therefore must be corrected and addressed in the licensee's ITAAC closure letter. An ITAAC-Related Construction finding may be related to a single ITAAC or a family of ITAAC.

03.17 Licensee. A person who is authorized to conduct activities under a license issued by the Commission. The holder of an NRC license (e.g., early site permit, construction permit, combined license, or limited work authorization).

03.18 Licensee-Identified. For the purpose of this inspection manual chapter (IMC), "licensee-identified" findings are those findings that are not NRC-identified or self-revealing. Most, but not all, licensee-identified findings are discovered through a licensee program or process.

Some examples of licensee programs or processes that will likely result in such findings are the identification and documentation of findings (e.g., non-conformances, procedural violations, procedure inadequacies, etc.) by craft workers and/or licensee/contractor supervision during routine construction activities, construction quality assurance activities, self-assessments, independent assessments, audits and surveillances. Additional examples may include preoperational testing, start-up testing, hydrostatic testing, non-destructive testing, EP drills, and critiques conducted by or for the licensee.

03.19 Minor Finding. An inspection result that does not affect the quality of design, fabrication, construction, or testing of structures, systems or components. These results must meet the screening criteria described in this manual chapter and generally include administrative issues; insignificant dimensional, time, calculation, or drawing discrepancies characterized by minor discrepant values referred to in the licensee's Final Safety Analysis Report or design documents; or insignificant procedural errors that have no impact on the quality of design, fabrication, construction or testing.

Although minor violations must be corrected, they are not usually described in inspection reports.

03.20 Non-Cited Violation (NCV). A method for dispositioning a Severity Level IV violation. Provided applicable criteria in the Enforcement Policy are met, such findings are documented as violations, but are not cited in notices of violation, which normally require written responses from licensees. As discussed in IMC 2505, a prerequisite for issuing NCVs is that the licensee must have satisfactorily completed a Corrective Action Program (CAP) effectiveness review.

03.21 Notice of Violation (NOV). A formal, written citation in accordance with 10 CFR 2.201 that sets forth one or more violations of a legally binding regulatory requirement.

03.22 NRC-Identified. For the purpose of this IMC, NRC-identified findings are those findings, found by NRC inspectors, of which the licensee was not previously aware or had not been previously documented in the licensee's corrective action program. NRC-identified findings also include previously documented licensee findings to which the inspector has significantly added value. Added value means that the inspector has identified a previously unknown significant weakness in the licensee's classification, evaluation, or corrective actions associated with the licensee's correction of a finding.

03.23 NRC Record. Any written, electronic, or photographic record under legal NRC control that documents the policy or activities of the NRC or an NRC licensee (see also the definition in 10 CFR Part 9).

03.24 Observation. As used in this manual chapter, an observation has two distinct definitions. The first definition is that each separate inspection entry into CIPIMS is designated as an "Observation" and assigned a sequential observation number. The second definition is the result of an inspection in which the outcome results in no identified findings. An observation is informational and should be assessment neutral (neither positive nor negative).

03.25 Quality Assurance. Quality Assurance (QA) comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system or component will perform satisfactorily in service. QA includes quality control.

03.26 Regulatory Commitment. An explicit statement of "intent" or "agreement" to take a specific action, agreed to or volunteered by a licensee, where the statement has been submitted in writing on the docket to the NRC. This may include a commitment in the licensee's application, a response to a Notice of Violation, etc.

03.27 Requirement. A legally binding obligation such as a statute, regulation, license condition, technical specification, or an order.

03.28 Self-Revealing. Self-revealing findings are those findings that become self-evident and require no active and deliberate observation by the licensee or NRC inspectors to determine whether a change in process or equipment capability or function has occurred. Additionally, self-revealing findings will normally be documented in the inspection report for the time period in which the self-revealing event occurred.

Self-revealing findings become readily apparent to either NRC or licensee personnel through a readily detectable degradation in the material condition, capability, or functionality of equipment or plant operations.

Some examples of self-revealing findings include failure of equipment or instrumentation to operate properly during testing that was not related to the purpose of the test (e.g., inadequate foreign material controls cause the failure) and non-compliance with radiography exclusion area requirements that are subsequently identified through an electronic dosimeter alarm.

03.29 Vendor. Any company or organization that provides products such as material, equipment, components, or services to be used in an NRC-licensed facility or activity. In certain cases the vendor may be an NRC licensee (e.g., a nuclear fuel fabricator) or the product may have NRC certificates (e.g., a transportation cask).

03.30 Violation. For the purposes of this manual chapter, the failure to comply with any portion of a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification.

0613-04 RESPONSIBILITIES AND AUTHORITIES

04.01 General Responsibilities.

NRC inspections associated with new reactor construction shall be documented in accordance with the guidance provided in this inspection manual chapter.

04.02 Inspectors.

- a. All inspectors have the primary responsibility for ensuring that their observations and findings are accurately reported; that referenced material is correctly identified; and that the scope and depth of findings are adequately supported by documented examples.
- b. Inspectors are responsible for ensuring that inspection reports are thoroughly and accurately documented in CIPIMS for the areas they inspected.
- c. All inspectors are responsible for ensuring that the content of the inspection report does not conflict with the information presented at the exit meeting. When the report differs significantly from the exit meeting, the inspector (or the report reviewer) should discuss those differences with the licensee before the report is issued. All such discussions with the licensee shall be documented in a summary statement of the report.

04.03 Branch Chiefs and Division Directors.

- a. The management reviewer shall ensure that inspection observations and findings are consistent with NRC policies and technical requirements, and that enforcement-related findings are addressed in accordance with the NRC

Enforcement Policy and the NRC Enforcement Manual.

- b. The applicable Branch Chief (or Division Director, as appropriate) is responsible for establishing inspection report content, tone, regulatory focus, and issuance timeliness.
- c. Branch Chiefs responsible for the associated project shall approve the final inspection reports. Reports containing potential escalated enforcement should be approved at least one management level above the Branch Chief.

04.04 Director, Office of New Reactors (NRO)

Provides overall direction for the NRC inspection programs associated with new reactor construction.

04.05 Director, Division of Construction, Inspection, and Operational Programs (DCIP), NRO.

- a. Directs the implementation of policies, programs, and procedures for inspecting vendors, applicants, licensees, and other entities associated with new reactor construction;
- b. Assesses the effectiveness, uniformity, and completeness of implementation of the inspection programs for new reactor construction;
- c. Approves changes to the inspection programs for new reactor construction.

04.06 Construction Inspection and Allegations Branch (CCIB), NRO.

- a. Provides interpretation of the information contained in this manual chapter; resolves questions related to this guidance; and provides guidance related to situations not covered in the manual chapter.
- b. Processes feedback and comments associated with this manual chapter.

0613-05 SCREENING INSPECTION RESULTS

The documentation process begins with the screening of inspection results to determine if an inspection issue must be documented in an inspection report. Use Attachment 1, "Construction Findings Flowchart" and the process described in the following steps to screen inspection results to determine if they are findings and what type of finding they are.

05.01 Screen for Licensee-Identified or Self-Revealing.

Determine whether the finding is licensee-identified or self-revealing. As further discussed in the Definitions section, for the purpose of this IMC, licensee-identified findings are those findings that are not NRC-identified or self-revealing. Most, but not

all, licensee-identified findings are discovered through a licensee program or process. Self-revealing findings are those findings that become self-evident and require no active and deliberate observation by the licensee or NRC inspectors to determine whether a change in process or equipment capability or function has occurred.

- a. NRC Response to a Licensee-Identified Finding. The licensee will enter the deficiency into the CAP. In most cases, the NRC will not take enforcement action for licensee-identified issues. However, the NRC may take enforcement action in accordance with the Enforcement Policy when one of the following criteria is met:
 1. Any issue that appears to meet the threshold for escalated enforcement action.
 2. Any issue that is related to potential harassment and intimidation or willfulness.
 3. Any technical issue or environmental condition that yields unexpected results not previously observed by the licensee or the NRC such as a significant common cause factor.
 4. Any issue that invalidates a previously closed ITAAC.
 5. An NRC inspector's identification of a previously unknown significant weakness in a licensee's classification, evaluation, or correction action associated with the licensee's correction of a finding.
- b. NRC Response to a Self-Revealing Finding. The licensee will enter the deficiency into the CAP. The NRC will treat a self-revealing issue in the same manner as NRC-Identified when one of the following criteria is met:
 1. Any of the conditions listed above for Licensee-Identified issues that result in NRC taking specific follow-up actions.
 2. Inspections or tests that yield unexpected results that are outside the scope of the test.
 3. Any issue that resulted from prior missed opportunities or is repetitive in nature due to inadequate corrective action.
 4. Inadequately controlled construction activities that directly cause an event, such as fire, damaged equipment, etc.

05.02 Screen for Non-compliance With Regulations or Licensee Commitments.

- a. Determine whether the item is a non-compliance with regulations or licensee commitments (i.e., failure to meet a requirement, standard, or commitment).
- b. NRC Response to Non-compliance with Regulations or Licensee Commitments.

NRC dispositions the deficiency in accordance with Attachment 1, "Construction Findings Flowchart."

1. If the issue is determined not to be a non-compliance with regulatory requirements or licensee commitments, NRC informs the licensee and the licensee will enter the deficiency into the CAP.
2. If the issue is determined to be a non-compliance, the staff will screen it to determine whether the finding should be considered greater than minor.

05.03 Screen for Greater-than-Minor.

- a. Determine whether the item should be considered greater-than-minor by answering the following questions. If the answer to any of the following questions is yes, the finding is greater-than-minor. If the answer to all of the following questions is no, the issue is minor and NRC informs the licensee and the licensee will enter the deficiency into the CAP.
 1. Does the finding represent an improper or uncontrolled work practice that impacted the quality of a structure, system or component (SSC) that has ITAAC requirements?
 2. Does the finding represent non-compliance with the requirements of a design or fabrication code required by 10 CFR 50.55a?
 3. Does the finding represent an inadequate process, procedure, or quality oversight function that, if left uncorrected, could adversely affect the quality of the fabrication, construction, testing, analysis, or records of an SSC that has ITAAC requirements?
 4. Does the finding represent a deviation that, if left uncorrected, could adversely affect the environmental or seismic qualification of an SSC?
 5. Does the issue have actual safety consequence (e.g., overexposure)?
 6. Does the issue have the potential for impacting NRC ability to perform its regulatory function? For example, a failure to provide complete and accurate information or failure to perform the change analyses required in Section VIII of the appropriate design certification appendix of 10 CFR Part 52, etc.
 7. Are there any willful aspects of the violation?
 8. Does the issue potentially impact employee protection provided in 10 CFR 52.5?
- b. NRC Response to Greater-than-Minor Finding. NRC dispositions the deficiency in accordance with Attachment 1, "Construction Findings Flowchart." If the issue is determined to be more than minor, the staff will screen it to determine what type of finding the issue will be designated.

05.04 Screen to Determine Type of Finding.

Determine whether the finding will be documented as a construction finding, an ITACC-related construction finding, or an ITAAC finding.

- a. If the finding is not associated with a specific ITAAC, then it should be documented as a construction finding.
- b. If the finding is associated with a specific ITAAC, determine whether the licensee has issued the ITAAC closure letter.
 1. If the answer is no, then determine whether it is material to the ITAAC acceptance criteria.
 - (a) If the answer is no, then it should be documented as a construction finding.
 - (b) If the answer is yes, then it should be documented as an ITAAC-related construction finding.
 2. If the answer is yes, then determine whether it is material to the ITAAC acceptance criteria.
 - (a) If the answer is no, then it should be documented as a construction finding.
 - (b) If the answer is yes, then it should be documented as an ITAAC finding.
- c. NRC Response to Different Types of Findings. NRC disposes the deficiency in accordance with Attachment 1, "Construction Findings Flowchart."
 1. If the issue is determined to be not related to a specific ITAAC, NRC will designate it a construction finding and evaluate the deficiency via the Enforcement Policy.
 2. If the issue is determined to be an ITAAC-related construction finding, the staff will inform the licensee and evaluate the deficiency via the Enforcement Policy.
 3. If the issued is determined to be an ITAAC finding, the staff will inform the licensee and evaluate the deficiency via the traditional enforcement process. Furthermore, the staff will evaluate the need to re-open other closed ITAACs, determine whether the NRC staff has accepted the licensee's ITAAC closure letter, and, if not, how it will treat the invalid closeout letter. If the staff has not yet accepted the letter, it may reject the closeout letter.

0613-06 DOCUMENTING INSPECTION RESULTS

06.01 Background.

A major focus of the Construction Inspection Program (CIP) is on the licensee work being performed to support the completion of the ITAAC. However, additional inspections of quality assurance verification activities and operational programs will also be conducted to provide assurance that these activities and programs are in compliance with applicable NRC requirements.

To support the CIP, a new application has been developed – the Construction Inspection Program Information Management System (CIPIMS). CIPIMS is a tool that will collect, organize, manage, and generate reports on information pertaining to (1) ITAAC description, status, and closeout process (2) inspection observation information and tracking (3) inspection report generation, and (4) assessment information.

Note: CIPIMS is currently under development. Any information related to CIPIMS is for reference until the system is approved and available for agency use.

During construction, the primary purpose of all inspections (on-site, at the licensee's offices, or at an offsite licensee or vendor facility), is to directly support IMC 2503, IMC 2504, and test inspection efforts. All inspections will be documented in CIPIMS as an observation for a specific docket number and assigned report number. The CIPIMS entry details in support of the CIP are discussed in Appendix B. Further information on the use of CIPIMS is available in the "Construction Inspection Program Information Management System (CIPIMS) User's Guide."

Report numbers for all inspections will be assigned by the Reactor Programs System (RPS). Report numbers will be assigned as the planned inspections are entered into the IP module of the RPS system. Inspectors can use the Inspection Planning (IP) module of RPS to add additional inspection activities to an existing inspection report number. Activities added via IP will be added to the employee's HRMS profile.

06.02 General Information.

The inspector shall document the inspection results. The finished report should be succinct and in sufficient detail to provide understanding of the issue and support all findings and conclusions. The write-up shall include the scope of the inspection, the results of the inspection (general observations and findings), appropriate conclusions (summary), and a list of significant documents reviewed.

Reports should be written in the past tense. The inspection occurred before the report was written; therefore, the inspector is describing what he or she observed. The purpose of a report is to provide facts and an interpretation of those facts. The use of plain and simple language is generally preferred, provided sufficient information is still included to support an inspector's conclusions. It is understood, however, that there will often be a need for detailed technical information to be documented to support an inspection finding and conclusion.

Note: CIPIMS is not a word processing program. Therefore, it is suggested that draft inspection report entries be developed in Microsoft Word, then cut and pasted into CIPIMS. Draft inspection reports should be developed with an avoidance of such word processing functions as subscripts, superscripts, exponentials, tables, and symbols (e.g., °, ~, ≤, ≥), since these word processing attributes are not compatible with CIPIMS.

06.03 Observations.

Each separate inspection entry into CIPIMS is designated as an “observation” and assigned a sequential observation number. Inspection activities that do not result in a finding will be designated as an “Observation” and will only consist of a scope section and a summary section. Each observation that results in a finding shall detail the basic issue identified and the facts an inspection team member gathers through watching work activities, examining procedures and technical documentation, interviewing applicant personnel, reviewing records, and other inspection methods that pertain to that finding. As documented, these findings should be factual. When documenting a finding, use language that clearly identifies how the finding was discovered and verified. Identify all records that are needed to support the finding that were examined, and include other factual information as relevant, such as the time of discovery, the length of time the problem existed, the type, size, or model of the equipment, if it is germane to the issue.

06.04 Title.

The observation title should concisely describe the focus of the inspection.

06.05 Scope.

The scope identifies the areas of focus for the inspection and how the inspection team examined these areas (document review, visual verification, etc.).

06.06 Summary.

The Summary section of the report is used to briefly document the overall conclusions reached during the inspection. These conclusions should include a brief synopsis of what type of finding was identified (if any) and what regulatory requirement was not met.

06.07 Findings.

The Findings section of the report, if needed, is used to document the following:

- Construction Findings
- ITAAC-Related Construction Findings
- ITAAC Findings

The Findings text will be further divided into the following subsections: Description, Analysis, and Enforcement.

The Description section provides the discussion of the what, when, and how a finding was identified and should describe all of the pertinent details. The level of detail in the description should reflect the significance associated with a finding.

The Analysis section should provide further detail and background related to the finding. Further detail may include what the potential implications were or could have been from the finding and the subsequent corrective actions, if applicable.

The Enforcement section will describe how the Enforcement Policy is being implemented for the identified finding. For an issue found during inspections to be categorized as a finding it must also have been a violation of a regulatory requirement and will therefore have to be documented in accordance with the NRC Enforcement Policy and Section 3.12 of the Enforcement Manual. The enforcement section for any described violation must include sufficient information to support the conclusion that the finding is a violation of regulatory requirements.

06.08 Records Reviewed.

The Records Reviewed section in CIPIMS allows an inspector to provide a list of records that were inspected. The inspector has the discretion of how many and which records to include in this section. The intent of the Records Reviewed section is to provide sufficient detail of those records specifically required to support a Finding. The intent is not to document every record or document an inspector reviewed, but rather to document only those records that were reviewed in detail and are essential in supporting a conclusion on the adequacy of licensee work, including supporting a finding.

0613-07 GUIDANCE FOR INSPECTION REPORT FORMAT AND CONTENT

Inspection reports follow the paragraph format consistent with the structure and content to that of inspection reports described in IMC-0612. Each inspection report is preceded by a cover letter and cover page.

07.01 Cover Letter.

The purpose of the cover letter is to transmit the inspection report results. Inspection reports are transmitted using a cover letter from the applicable NRC official to the designated licensee executive. Cover letter content varies somewhat depending on whether the inspection identified significant findings. In general, every cover letter has the same basic structure, as follows:

- a. Date, Addressee, and Salutation. At the top of the first page, the cover letter begins with the NRC seal and address, followed by the date on which the cover letter is signed and the report issued. The name and title of the principal addressee are placed at least four lines below the letterhead, followed by the licensee's name and address. Note that the salutation is placed after the subject line.

For cover letters transmitting reports with findings assigned an enforcement action (EA) number, the EA number should be placed in the upper left-hand corner above the principal addressee's name.

- b. **Subject Line.** The subject line of the letter should state the facility name (if it is not apparent from the Addressee line) and the inspection subject. The words "NOTICE OF VIOLATION" should be included if such a notice accompanies the inspection report. The entire subject line should be capitalized.
- c. **Introductory Paragraph.** The first two paragraphs of the cover letter should give a brief introduction, including the type of inspection report.
- d. **Body of the Letter.** In keeping with the need to communicate in "Plain English", the body of the letter should discuss the most important topics first.

The cover letter is written to transmit the inspection report to the licensee's management, and to deliver the "big picture" message regarding the inspection. Because it is the highest-level document, it does not need to (and normally won't) detail all of the items inspected and the inspection procedures used. It will note the areas covered by the inspection.

In general, the body of the cover letter should focus on clearly communicating a few main points (or a single point) that are well-supported by the report details, rather than attempting to deliver a large number of points or extensive detail. If no significant issues were raised by the inspection, this section should briefly summarize the scope of specific inspection activities performed to give perspective to the conclusion that no deficiencies or significant issues were identified.

- e. **Closing.** The final paragraph consists of standard legal language that varies depending on whether enforcement action is involved.

The final paragraph consists of a statement regarding the public availability of the inspection report and associated correspondence. The signature of the appropriate NRC official is followed by the list of enclosures and distribution.

<p>Note: Sample cover letters are located at http://nrr10.nrc.gov/NRO/CIP/program-documents.cfm.</p>

07.02 Notice of Violation.

Licensees are officially notified that they have failed to meet regulatory requirements when NRC issues a Notice of Violation (NOV). NOVs may be sent to licensees as part of a package of documents which also includes a cover letter and associated inspection report. NOVs may be sent with a cover letter which refers to an inspection report that was distributed previously. An NOV should not be sent to the licensee in advance of

the inspection report.

Every NOV must be clear, so that there is little doubt that the licensee (or other interested reader) can understand the basis for the violation. The licensee may not agree with the basis, but they must understand the NRC position.

Every NOV must clearly state what the requirement was that was not met. That may mean that the date and revision number of the applicable document will need to be provided. Then a clear statement of what happened (including when, if timing is important) will be provided. The intent is that any interested reader will be able to clearly see and understand what the requirement was and how it was not met. For additional guidance on documenting violations, refer to the NRC Enforcement Manual. The NOV should be an enclosure to the cover letter.

07.03 Table of Contents.

If a report is considered complicated or of significant length, then develop a table of contents. If the inspection report, from the Report Details section to the exit interview section, is more than 20 pages long, a table of contents should be considered.

07.04 Cover Page.

The inspection report cover page will be generated from CIPIMS based on information provided via a pop-up window at the time the report is generated and provides a quick-glance summary of inspection information. It contains the docket number, license number, report number, licensee, facility, location, dates of inspection, the names and titles of participating inspection team members, accompanying individuals, and the name, signature, and title of the approving NRC official.

<p>Note: Sample CIPIMS-generated cover pages are located at http://nrr10.nrc.gov/NRO/CIP/program-documents.cfm.</p>

07.05 Inspection Report Content.

The detailed content of the body of the inspection report is discussed in the following sections. Parts I through III will be automatically generated by CIPIMS for the designated inspection period.

- a. Summary of Findings [Part I of the Report]. The Summary of Findings section will automatically be generated by CIPIMS and will consist of observations resulting in an open finding. If there are no open findings the section will consist of the statement 'No Findings of Significance'. Information in this section includes:
 - Inspection Procedure and Title
 - Additional Procedure and Title
 - Finding Number (which is automatically assigned when the report is generated)
 - Finding Title

- Summary Text
- b. Observations [Part II of the Report]. The Observations section will automatically be generated by CIPIMS and will consist of all observations entered for the Inspection Report. Information in this section includes:
- EA Number (if applicable)
 - Observation title
 - Family / ITAAC No., if applicable
 - Inspection Procedure and Title
 - Additional Procedure and Title
 - Scope text
 - Summary text
 - Findings text, if applicable
1. Scope. Describe the inspection scope. Do not repeat any portion of the Scope in the Findings section. The scope should include the following:
- (a) Identify how the inspection was conducted (i.e., the methods of inspection). Methods can include a walk-down, an in-office review, direct observation of a test/process from the control room or in the field, discussion with specific personnel, or participation in an exercise.
 - (b) Identify what was inspected. Include sufficient detail to later reconstruct the scope of inspection, including those documents necessary for reaching a finding. Examples would be to include specific references to licensee drawings, corrective action documents, precise weld descriptions, etc. Any additional significant supporting documents that were reviewed may be listed in the Documents Reviewed section.
 - (c) Identify the inspection objectives and the criteria that were used to determine whether the licensee is in compliance.
 - (d) Discuss where the inspection activity was conducted (i.e., at the facility construction site, at a vendor location, in the plant).
 - (e) Include specific dates, only if necessary, to further clarify inspection scope or to better understand a timeline of events.
2. Summary. The Summary section should summarize the overall results of the inspection, including what was inspected and when, what the findings were, what type of finding was identified, and what enforcement action(s) and basis.

The Summary section should include the following statement if no findings were identified: "No significant findings were identified."

3. Findings. The Findings section should be used to present, in a concise but narrative format, the findings identified by the inspection team members. This should include a discussion of the policies and procedures governing the applicants programs for each area reviewed, a description of the inspection sample evaluated by the inspection team (e.g., portions of the COLA, test results, calculations, design packages, drawings, technical reports, etc.), and the results of the inspection evaluations conducted. The inspector may choose to simply number issues sequentially, with appropriate subheadings, or may use another method of organizing the findings.

The Findings section is subdivided into three distinct sections: Description, Analysis, and Enforcement.

- (a) Description. This section describes the deficiency that constitutes the basis for the finding. The level of detail in the Description section should reflect the actual or potential safety consequence associated with the finding. Potentially significant findings may merit more discussion.

If a finding is likely to have generic construction or design concerns, then include details such as the manufacturer's name and model number for components, specifications, and other information or technical data that further identifies the item of concern.

- (b) Analysis. The Analysis section is typically the longest of the three sections and describes the nature of the finding and should provide sufficient detail in discussing the logic used by the inspector in screening an issue. The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusion. Use of verbiage from each decision block in Attachment 1, "Construction Findings Flowchart," should provide an adequate method for informing the reader of the decision process.

Include a description of any positive licensee performance that mitigated a potential problem and influenced the significance of the finding. Discuss licensee corrective actions, as applicable.

- (c) Enforcement. The Enforcement section should discuss the details of the identified violation and how the enforcement policy is being applied. It should be written in the same manner as a Notice of Violation, with a paragraph on the regulatory requirement that was violated followed by a paragraph with the "contrary to" portion. Findings identified during inspections are documented in accordance with the NRC Enforcement Policy and Chapter 2.13 of the NRC Enforcement Manual. The enforcement discussion and subsequent enforcement action must be consistent with the significance of the issue.

Do not speculate or reach conclusions about the intent behind a violation. Conclusions about the willfulness of a violation are agency decisions, and are normally not made until after the Office of Investigations (OI) has completed an investigation. A premature or inaccurate discussion of the willfulness of a violation in the inspection report could result in subsequent conflicts based on additional input and review. Inspection reports that include potentially willful violations must be coordinated with OI and the Office of Enforcement (OE). The following guidance also applies:

- (1) NRC-identified violations should be considered for cited violations of the original requirement if the licensee failed to restore compliance within a reasonable time after a violation was identified or the licensee did not place the violation into a corrective action program to address recurrence (see Section VI.A.1 of the NRC Enforcement Policy).
- (2) If a violation is categorized at Severity Level IV and the criteria specified in Section VI.A.1 of the Enforcement Policy does not apply, then the violation may be dispositioned as a non-cited violation (NCV) as long as the licensee's corrective action program (CAP) was determined to be adequate as discussed in IMC 2505. It should be documented in accordance with the guidance in Section 3.1 of the Enforcement Manual.

For Severity Level IV NCVs, state the following: "Because this violation was of very low significance, was not repetitive or willful, and it was entered into the licensee's corrective action program, this violation is being treated as an NCV, consistent with Section VI.A.1 of the NRC Enforcement Policy."

- (3) To address recurrence, as the term is used in Section VI.A.1 of the NRC Enforcement Policy, means that the licensee enters the issue into the established corrective action program for appropriate evaluation and corrective action. For the purposes of meeting the NCV criteria, the inspectors will ensure that the licensee has placed the violation into the corrective action program. Inspectors are not expected to evaluate the appropriateness of the licensee's plan to address recurrence. The actual corrective actions the licensee subsequently takes are subject to review during future problem identification and resolution inspections and can be evaluated at a later date.
- (4) The enforcement section for any described violation must include sufficient information, in combination with other sections, to support the conclusion that the finding is more than minor and is a violation of regulatory requirements. At a minimum the enforcement section should state:

- What requirement was violated;
 - Why the violation is greater-than-minor;
 - How the violation occurred;
 - When the violation occurred and how long it existed;
 - When the violation was identified;
 - Any actual or potential safety consequence (if not described earlier);
 - The root cause or apparent root cause at the time of report writing (if identified and not described earlier);
 - What immediate corrective actions were taken to restore compliance (if not described earlier) and a reference to the licensee's corrective action document number; and,
- Specific enforcement actions (i.e., cited or non-cited) and tracking number resulting from the violation.
- (5) Violations of 10 CFR Part 50, Appendix B, Criterion XVI, for failure to “preclude repetition” can only be written for “significant” conditions adverse to quality (SCAQ). The inspection report details must clearly explain the basis for determining that the previous condition was a SCAQ (“i.e., the condition meets the definition of a SCAQ per the licensee’s corrective action program”), the relationship between the previous SCAQ and the current one, and the corrective actions from the previous SCAQ that failed to prevent recurrence.
- (6) Violations that have preliminarily been determined to be potentially greater than Severity Level IV should be documented in the inspection report as “apparent violations.” Apparent violations should also include the following in the enforcement section if available at the time of documentation:
- The licensee’s position on the NRC’s determination that a requirement has been violated.
 - If appropriate, the section should also identify the licensee’s compensatory measures that are in place while the licensee implements its long-term corrective measures.

CAUTION: Do not make direct statements regarding significance in the inspection report when the agency has not yet reached a conclusion. Conclusions about the significance of findings may be agency decisions and are normally not made when the report is issued. A premature or inaccurate discussion of the finding in the inspection report could become inaccurate as a result of subsequent input and review.

An inspection report outline is provided in
<http://nrr10.nrc.gov/NRO/CIP/program-documents.cfm>.

- c. Records Reviewed [Part III of the Report]. This section is automatically generated by CIPIMS based on the documents listed as reviewed by the inspector in CIPIMS for each observation or finding. "Reviewed" in this context means to examine critically or deliberately (see IMC 0620, "Inspection Documents and Records"). The intent is not to document every record or document an inspector reviewed, but rather to document only those records that were reviewed in detail and are essential in supporting a conclusion on the adequacy of licensee work, including supporting a finding.

07.06 Exit Meeting Summary.

The final section of each inspection report should include a brief summary of the exit meeting conducted in conjunction with the inspection. This information will also be described in the first paragraph of the cover letter. The exit meeting summary must also include the following information:

- a. Personnel Contacted. This portion of the report should identify the individuals who furnished relevant information or were key points of contact during the inspection (except in cases where there is a need to protect the identity of an individual). The list should not be exhaustive but should identify those individuals who provided information related to developing and understanding findings. The list includes the most senior licensee manager present at the exit meeting and NRC technical personnel who were involved in the inspection if they are not listed as inspectors on the cover page.
- b. Proprietary Information. At the exit meeting, the inspectors will verify whether the licensee considers any materials provided to or reviewed by the inspectors to be proprietary. If the licensee did not identify any material as proprietary, include a sentence to that effect in the exit meeting summary. Refer to IMC 0620 for actions to take if the report includes proprietary material.

NOTE: Inspectors should be aware of minimum requirements for handling classified and sensitive non-classified information. When an inspection is likely to involve proprietary information (i.e., given the technical area or other considerations of inspection scope), handling of proprietary information should be discussed at the entrance meeting.

- c. Subsequent Contacts or Changes in NRC Position. If the NRC position on an inspection finding changes after the exit meeting, conduct an additional exit meeting to discuss that change with the licensee. Also, document the additional exit meeting in the inspection report.
- d. Characterization of Licensee Response. Do not characterize a licensee's exit meeting response. If the licensee disagrees with an inspection finding, this

position may be characterized by the licensee in its formal response to the inspection report, if applicable.

- e. 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 ADAMS Accession Nos. [ML003680088 \(NEI 99-04\)](#), [ML003680078](#) and [ML003679799 \(NEI Cover Letter and SECY 00-045 endorsing NEI 99-04 guidance\)](#). Because regulatory commitments are a sensitive area, ensure that any reporting of licensee statements are paraphrased accurately and contain appropriate reference to the licensee's document.

07.07 List of Acronyms.

Consider including a list of acronyms for any report whose Details section exceeds 20 pages. For reports in which a relatively small number of acronyms have been used, the list is optional. The list is also optional if more than 20 pages and the number of acronyms are relatively small. In all cases, however, acronyms should be spelled out when first used in inspection report text.

0613-08 ISSUING INSPECTION REPORTS

08.01 Report Issuance.

- a. Periodicity of Issuing Reports during Construction and Testing:
 - 1. Post-COL Issue, but Pre-Fuel Load. During the course of site construction activities, the responsible inspection organization should establish an appropriate periodicity (e.g., 30, 60, or 90 days) for integrated reports.
 - 2. Post-Fuel Load. During the time between fuel load and commercial operation, consideration should be given to monthly or bi-monthly reports of testing activities, with a separate report for activities involving transition to the NRC Regulatory Oversight Process (ROP).
- b. Responsible Organization for Reports. For each reactor docket, the assigned division director or designated branch chief shall be responsible for the report content, tone, conclusions, and overall regulatory focus for all inspection reports. This responsibility includes resolution of discrepancies discovered during the review process, and the final "locking" of applicable CIPIMS entries by the entry of the ADAMS ML number for the report.

08.02 Report Timeliness.

a. General Timeliness Guidance

1. CIPIMS entries should be completed, and reviewed by supervision, within five working days after completion of the inspection. With access to computer equipment, inspectors should establish a routine of “complete as you go” for CIPIMS entries to ensure timeliness of reports.

Note: Inspection completion for CIPIMS entries is defined as the last day on site for a visiting specialist inspector. Even without access to CIPIMS during inspections, inspectors can complete their inspection observations in any word processing program available and later cut and paste the observation into CIPIMS. CIPIMS will be available via Citrix.

2. Inspection reports should be issued in a time frame no longer than the length of the report period but in no case later than 45 calendar days after inspection completion. For example, if the report period is 30 days then the report should be issued within 30 days. If the report period is 60 days then the report should be issued within 45 days.
3. Inspection reports covering potential escalated enforcement action should be accelerated, as necessary, and issued no later than 30 calendar days after inspection completion.

Note: Inspection completion for team inspections is defined as the day of the exit meeting. For integrated or resident inspection reports, inspection completion is defined as the last day covered by the inspection period.

- b. Expedited Reports Documenting Significant Impact on ITAAC. Inspection reports covering ITAAC findings, especially during the final few months prior to the scheduled fuel load, should be considered for acceleration of timeliness goals. In these cases, an expedited inspection report should be prepared that is limited in scope to the ITAAC finding(s) involved.

0613-09 RELEASE AND DISCLOSURE OF INSPECTION REPORTS AND ASSOCIATED DOCUMENTS

09.01 General Public Disclosure and Exemptions.

Except for report enclosures containing exempt information, all final inspection reports will be routinely disclosed to the public. Exempt information includes, but is not limited to, the following:

- Information associated with 10CFR 2.390 and 10 CFR 9.17
- Information pertaining to ongoing allegations as discussed in Management Directive 8.8, “Management of Allegations”
- Records and inspection-related documents as described in IMC 0620,

“Inspection Documents and Records”

- Sensitive unclassified information (e.g., safeguards information, official use only, proprietary information)
- Proprietary and Business Sensitive Information

END

Appendix A

Acronyms Used in IMC 0613

ADAMS	Agency-wide Documents Access and Management System
CAP	Corrective Action Program
CCIB	Construction Inspection and Allegation Branch (of NRO DCIP)
CFR	Code of Federal Regulations
CIP	Construction Inspection Program
CIPIMS	Construction Inspection Program Information Management System
COL	Combined License
COLA	Combined License Application
DC	Design Certification
DCIP	Division of Construction Inspection & Operational Programs
EA	Enforcement Action
ESP	Early Site Permit
IMC	Inspection Manual Chapter
INPO	Institute of Nuclear Power Operations
IP	Inspection Procedure
ITAAC	Inspections, Tests, Analyses, and Acceptance Criteria
M&TE	Measuring and Test Equipment
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NOV	Notice of Violation
NRC	Nuclear Regulatory Commission
NRO	Office of New Reactors
NRR	Office of Nuclear Reactor Regulation
OE	Office of Enforcement
OI	Office of Investigations
QA	Quality Assurance
ROP	Regulatory Oversight Process
RPS	Reactor Program System
SCAQ	Significant Condition Adverse to Quality
SSC	Structure, System or Component
VIO	Violation

Appendix B

GUIDANCE FOR THE USE OF THE CONSTRUCTION INSPECTION PROGRAM INFORMATION MANAGEMENT SYSTEM (CIPIMS) FOR DOCUMENTING INSPECTIONS AND DEVELOPING INSPECTION REPORTS

A. Inspection Detail Entry and Review. The details of each inspection activity concerning the construction and test of a reactor facility shall be documented in a narrative report entry in CIPIMS.

Completed CIPIMS entries will periodically be extracted for input into an integrated report consisting of a cover letter, a cover page, a summary of findings and inspection details. Final reports will be entered into ADAMS as the official record of inspection results.

1. Inspectors. All NRC inspectors are required to prepare construction and test inspection report observations in accordance with the guidance provided in this manual chapter.
 - a. Inspectors shall categorize all inspection results into observations and findings, and link each inspection result to the appropriate ITAAC(s) and/or Program(s).

Observations may stand alone as inspection results and indicate that no findings were identified.

The inspector shall further categorize findings and observations in accordance with Sections 0613-05 and 0613-06.

- b. The inspector shall prepare a write-up of inspection results in a succinct narrative fashion appropriate for inclusion in a finished report. The write-up shall include the scope of the inspection, the results of the inspection (observations or findings), and appropriate conclusions.

Reports should be written in the past tense. The inspection was conducted before the report was written. The inspector is describing what he did and what he found. Use plain language. The purpose of the report is to report facts and the interpretation of those facts. Most of the time, simpler language is better.

2. Documenting Inspections in CIPIMS. The inspector's narrative write-up shall be entered into CIPIMS and shall include all information required by CIPIMS to link the inspection results to the appropriate docket number, assigned report number, and the area(s) of inspection (e.g., ITAAC family, Construction or Operational Program, etc.).

Refer to the CIPIMS Users Guide for detailed guidance in recording inspection observations, generating inspection reports, and obtaining database information in report format.

- a. **Create and Update Observations.** The Create/Update Observation process provides the ability to create observations for a specific Docket and Inspection Report as well as view and update existing observations. The inspector has the capability to create and categorize each Observation as either ITAAC or Non-ITAAC. Further categorization and detail is available to help further define observations such as Summary, Procedure number referenced, and Findings Text. The information entered in this window will be used in the generation of the Inspection Report.

Once an observation is defined, it will go through a process of state changes from “Draft” to “Locked” so as to be included in the Inspection Report. An observation in draft form indicates that it may be edited.

An observation that is “Ready for Approval” has all fields disabled. The approver reviewing the observation may send the draft to the inspector for additional changes or set it to Approved status. Once an inspection report is finalized, the approved observations become locked and no further entries are permitted.

Note: An observation may be changed from Locked to Draft; however, this will result in the inspection report no longer being finalized and requiring the report to once again go through the review process. CIPIMS will not permit the user to unlock an observation that is on a finalized report or has been pulled into a subsequent report for follow-up. Within the 3-day grace period the inspection report can be un-finalized which will set all observations (excluding those that have been pulled into a subsequent report) back to the approved state.

- b. **Open Item Observations.** The Open Item Observations window provides the ability to pull an open observation into a new inspection report. The user can select an inspection report and see all the available observations that can be pulled into the report. When the observation is pulled into a new report, a new sequence is created for the observation. The new sequence will contain information from the previous sequence such as Title, ITAAC/Program, and CAP Numbers. Fields available for editing on the new sequence will be limited to Inspection Procedure No., Additional Procedure No, inspector, contractor location, contractor name, Status of Follow-up, notes, blank CAP Numbers, and the Text fields. By pulling the observation into a new report, the observation can either be updated or closed.

- c. **Additional Information.** In cases where listing(s) of documents reviewed for an inspection observation are too extensive to enter into the CIPIMS observation for the report, the inspector shall prepare a special feeder report containing the required information (referencing the CIPIMS entry being supported) and forward it to the lead inspector for later inclusion in the report containing the related CIPIMS observation.

Listing of personnel contacted during the inspection shall be included as a special feeder report containing the required information (referencing the CIPIMS entry being supported) and forwarded to the lead inspector for possible inclusion in the report containing the related CIPIMS observation.

B. Organization of CIPIMS Observations into a Periodic Report.

1. **Inspectors.** At the specified periodicity, the lead inspector for the project will extract completed inspection observations from CIPIMS for assembly into an inspection report. The lead inspector will typically be responsible for the preparation of the cover letter and other report sections required by this manual chapter.
 - a. When CIPIMS is queried for observations assigned to an inspection report, CIPIMS is designed to automatically provide all associated observations. Those observations that are categorized as incomplete by the inspector and/or have not been approved by the inspector's supervisor will be flagged. The lead inspector shall contact the inspection supervisor(s) to have the observations completed and approved or reassigned to the next integrated report number.
 - b. If the inspection supervisor(s) have justification why the observation cannot be completed in time for the issue of the next periodic report, the lead inspector shall confirm that the observation has been re-assigned to the next integrated report number prior to extracting the completed observations to build the report.
2. **Reviewers.** Before issuance, each inspection report should be reviewed by a member of NRC management familiar with NRC requirements in the area inspected. All CIPIMS observations shall be reviewed and approved by a member of management for content and format as required by this manual chapter and the CIPIMS User's Guide. The review shall include the appropriate categorization of any finding.
 - a. Final reports shall be approved by the Branch Chief responsible for the project. Reports containing potential escalated enforcement should be approved at least one management level above Branch Chief.

- b. This review should establish that conclusions are logically drawn and sufficiently supported by observations and findings, and that the observations, findings, and conclusions are consistent with NRC policies and requirements.
 - c. There will be occasions during the management review of prepared reports when a decision will be made to change the category of a finding (i.e., from a construction finding to an ITAAC finding or vice versa, from an observation to a finding, etc.) As a minimum, these changes should be discussed with the inspector(s) of record for the affected CIPIMS entry, or at the very least, the approving supervisor for the CIPIMS entry, to ensure continued concurrence. CIPIMS entries shall be adjusted to agree with the management position. (Note: the category (outcome) of the finding can be changed while the observation is in the draft state.
3. Report Issuing Organization. Periodic assessment of licensee/vendor performance and assessment of inspection documentation for completion of ITAAC will be done through a search of CIPIMS to validate that the information is accurate and complete.
4. Generating an Inspection Report. The Generate Inspection Report window provides the ability to view the details of, as well as, generate an inspection report. Users can view a list of inspectors that have made observations for a specific inspection report along with the lowest state of the observation. Further details of the observations made by the inspectors can be viewed from this window. Users will also have the ability to reassign observations that have not been approved to a different inspection report.

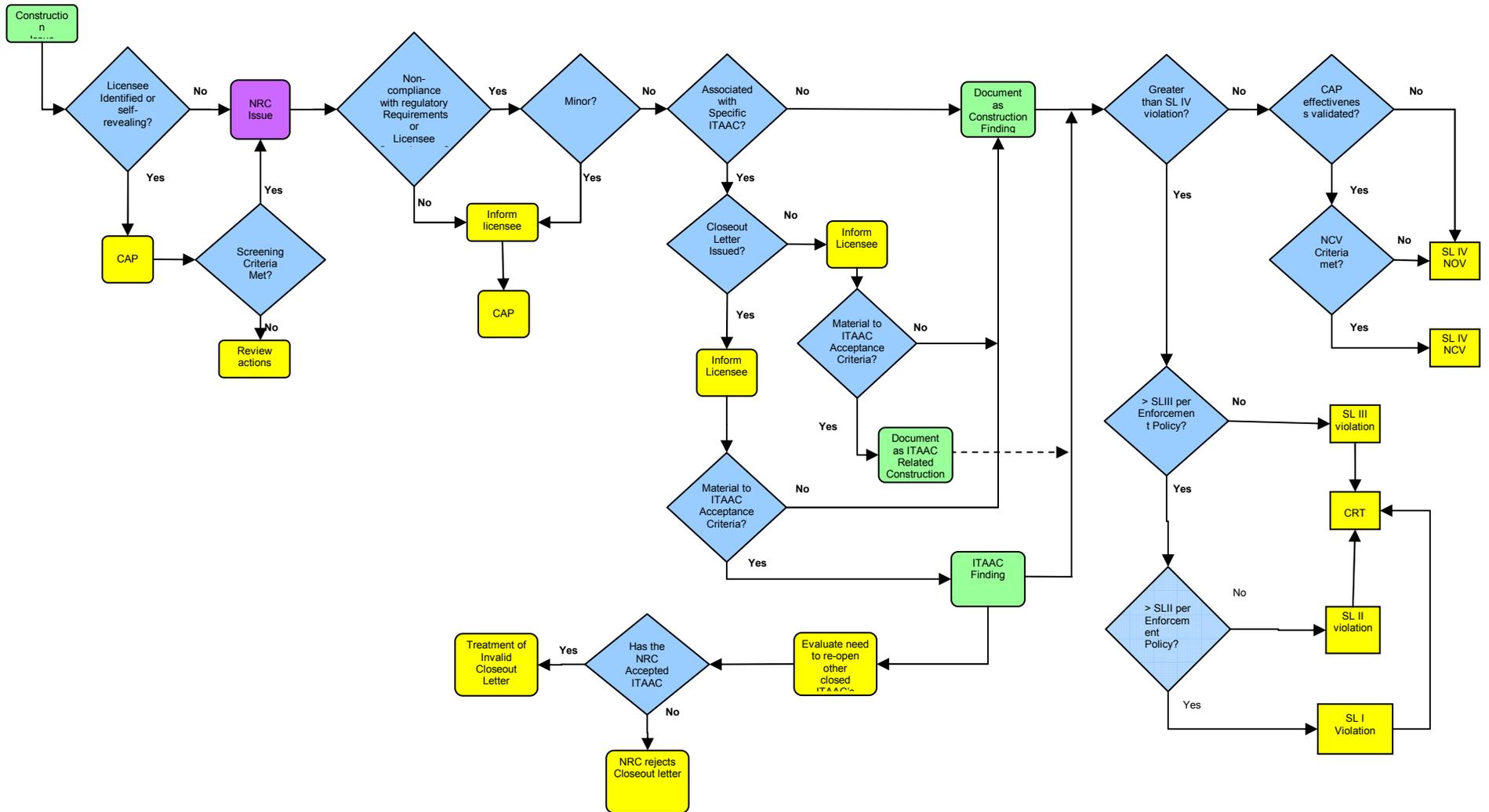
The Generate Inspection Report button provides the ability to finalize an inspection report, as well as generate a portable document format (PDF) version of the report. Users with the appropriate authority will have the ability to Finalize the inspection report.

Finalizing an inspection report means that all the observations have been recorded, approved, and the inspection report is ready to be put into ADAMS. When Finalized, all associated observations will be put into the Locked state and no further observations may be recorded for that inspection report. When a report is Finalized, a PDF version of the document can be created (if Adobe Acrobat PDF Writer is installed) or a hard copy version of the document can be printed.

C. Procedures for Concurrence Reviews. The inspector and reviewer concurrence process shall be in accordance with agency-approved procedures. These procedures address how to ensure continued inspector concurrence when substantive changes are made to the report as originally submitted, and how to address and resolve any internal differences that may occur during the review process.

D. Procedure for Non-concurrence. The agency has a mechanism for inspectors and reviewers to document “non-concurrences” when inspection report issues or substantive changes cannot be adequately resolved. The procedure addresses how to document these non-concurrences and the criteria for when and how a documented non-concurrence will be attached to the inspection report.

ATTACHMENT 1 Construction Findings Flowchart



ATTACHMENT 2
Revision History for IMC 0613

Commitment Tracking Number	Issue Date	Description of Change	Training Required	Training Completion Date	Comment Resolution Accession Number
N/A	10/20/08 CN 08-029	<p>Researched commitments for 4 years and found none.</p> <p>Initial issuance to provide direction for format and content when writing construction inspection reports.</p>	Yes	N/A	N/A