

# **NRC INSPECTION MANUAL**

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MANUAL CHAPTER 0612

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POWER REACTOR INSPECTION REPORTS

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Attachment 1 – Revision History for IMC 0612

## 0612-01 PURPOSE

The purpose of this Inspection Manual Chapter is to provide guidance for screening inspection results and to define the content and format for reports of power reactor inspections.

## 0612-02 OBJECTIVES

02.01 To screen inspection results to determine if issues warrant documentation in inspection reports.

02.02 To ensure inspection reports clearly communicate significant inspection results in a consistent manner to licensees, Nuclear Regulatory Commission (NRC) staff, and, where applicable, the public.

02.03 To document the basis for significance determination and enforcement action.

02.04 To provide inspection results as input into the [Operating Reactor Assessment Program \(Inspection Manual Chapter \[IMC\] 0305\)](#) of the Reactor Oversight Process (ROP) and the [IMC 0320, 'Operating Reactor Security Oversight Process.'](#)

## 0612-03 GLOSSARY

The following terms are applicable for the purposes of screening and documentation:

03.01 [Actual Consequences \(or Actual Safety or Security Consequences\)](#). Include actual onsite or offsite releases of radiation, onsite or offsite radiation exposures, accidental criticalities, core damage, loss of significant safety barriers, loss of control of radioactive material or radiological emergencies. The significance of violations involving actual safety consequence is determined through Traditional Enforcement (TE) in accordance with the [Enforcement Policy](#) and the [Enforcement Manual](#). TE results in the assignment of a severity level (SL) to the violation and, if appropriate, the imposition of a civil penalty (CP). The significance of findings underlying TE violations is determined in accordance with [IMC 0609, 'Significance Determination Process.'](#) The SDP results in the assignment of an ROP significance color (Green, White, Yellow, or Red).

03.02 [Allegation Review Board \(ARB\)](#). A board established by office directors and regional administrators and consisting of a chairman, an Office allegation coordinator, and one or more other individuals within the office or region to determine the safety significance and appropriate NRC follow-up for each allegation. The ARB permits expeditious resolution of allegations. Staff from the Office of Investigations, Office of Enforcement, or regional enforcement personnel, and the Office of the General Counsel or regional counsel participate as necessary. Additional discussion can be found in [Management Directive \(MD\) 8.8, 'Management of Allegations,'](#) and below, under Section [0612-11, 'Minor Issues and Minor Violations.'](#) Additional staff guidance is published in internal office instructions.

03.03 Apparent Violation (AV). A noncompliance with a regulatory requirement for which an enforcement decision has not been reached. This interpretation is congruent with discussion in both the Enforcement Policy and the Enforcement Manual and may be used to characterize (a) non-compliances associated with ROP findings that are Potentially Greater Than Green or Preliminary Greater Than Green or (b) more-than-minor violations (with or without associated findings) for which a decision has not been reached regarding enforcement discretion. Also, see Appendix B, 'Issue Screening,' of this IMC.

03.04 Careless Disregard. Refers to situations in which an individual acts with reckless indifference to at least one of three things: (1) the existence of a requirement, (2) the meaning of a requirement, or (3) the applicability of a requirement. Careless disregard occurs when an individual is unsure of the existence of a requirement, the meaning of a requirement, or the applicability of the requirement to the situation, but nevertheless proceeds to engage in conduct that the individual knows may cause a violation. Although aware that the action might cause a violation, the individual proceeds without first ascertaining whether a violation would occur. See additional discussion in the Enforcement Policy and the Enforcement Manual.

03.05 Civil Penalty. Is a monetary penalty that may be imposed for violations of (1) certain specified licensing provisions of the Atomic Energy Act or supplementary NRC rules or orders; (2) associated with for which a license may be revoked; or (3) reporting requirements under Section 206 of the Energy Reorganization Act. See additional discussion in the Enforcement Policy and the Enforcement Manual.

03.06 Corrective Action Program (CAP). Is a licensee's process for tracking, evaluating, and resolving deficiencies.

03.07 Cross-Cutting Area. Fundamental performance attributes that extend across all of the ROP cornerstones of safety. These areas are Human Performance (HU), Problem Identification and Resolution (PI&R), and Safety Conscious Work Environment (SCWE).

03.08 Cross-Cutting Aspect (CCA). A performance characteristic that is the most significant contributor to a performance deficiency.

03.09 Cross-Cutting Area Component. A component of safety culture that is directly related to one of the cross-cutting areas. The cross-cutting area components in alphabetical order are: Corrective Action Program; Decision-Making; Environment for Raising Concerns; Operating Experience; Preventing, Detecting, and Mitigating Perceptions of Retaliation; Resources; Self and Independent Assessments; Work Control; and Work Practices.

03.10 Enforcement Manual. The primary source of guidance regarding agency policy and procedures for NRC staff implementing the enforcement program. The Enforcement Manual contains procedures, requirements, and background information that are essential to those who develop or review enforcement actions for the NRC. It is subordinate to and provides guidance consistent with the Enforcement Policy.

03.11 Enforcement Policy. Sets the general principles governing the NRC's enforcement program and the Commission's expectations regarding the process to be used by the NRC

to assess and disposition violations of NRC requirements. The Policy also describes how organizations and individuals subject to NRC enforcement actions can provide input to the process. However, the Enforcement Policy is not a regulation. The Commission may deviate from policy as appropriate under the circumstances of a particular case.

03.12 Escalated Enforcement Actions. Include (a) Severity Level I, II, and III Notices of Violation (NOVs); (b) NOVs associated with inspection findings that the Significance Determination Process (SDP) evaluates as having low to moderate (White) or greater safety significance; (c) civil penalties; (d) NOVs to individuals, (e) orders to modify, suspend, or revoke NRC licenses or the authority to engage in NRC-licensed activities, and (f) orders issued to impose civil penalties. Additional discussion can be found in the Enforcement Policy, the Enforcement Manual, and elsewhere in this IMC.

03.13 Event. As commonly used, means (1) an occurrence characterized by an active adverse impact on equipment or personnel, readily obvious by human observation or instrumentation, or (2) a radiological impact on personnel or the environment in excess of regulatory limits, such as an overexposure, a release of radioactive material above NRC limits, or a loss of radioactive material. For example, an equipment failure discovered through a spill of liquid, a loud noise, the failure of a system to respond properly, or an annunciator alarm would be considered an event; a system discovered to be inoperable through a document review would not. Similarly, disclosure during quarterly dosimetry readings of an overexposure would be considered an event whereas discovery that employees had been inadequately monitored (but absent indication of overexposure) would not be considered an event.

03.14 Finding. A performance deficiency of more than minor significance. A finding may or may not be associated with regulatory non-compliance and, therefore, may or may not result in a violation. The acronym 'FIN,' as used in inspection reports and in the Reactor Program System (RPS), is more restrictive than the word 'finding.' FIN refers to a finding *without* an attached (non -TE) violation whereas a finding *with* an attached (non-TE) violation would typically be referred to either as an NCV or NOV. It should be noted that NCV and NOV are *also* used to refer to violations (TE or non-TE) *without* associated findings.

03.15 Green Finding. A finding of very low safety significance as determined by IMC 0609, 'Significance Determination Process.'

03.16 Impacts the Regulatory Process (Impacts NRC's Ability to Perform Its Regulatory Function). Those violations that prevent the NRC from using appropriate regulatory tools to address noncompliance, licensee performance, and/or potential safety concerns because the Agency is unaware that the issues exist. These types of violations may include:

- Failure to obtain NRC approval for- or to notify NRC of changes involving licensed activities when required by regulations (e.g. 10 CFR 50.54, 'Conditions of licenses' and 10 CFR 50.59, 'Changes, tests and experiments,')

- Failure to make reports required by regulations (e.g. 50.72, 'Immediate notification requirements for operating nuclear power reactors,' 50.73, 'License event report system,' and PART 21, 'Reporting of Defects and Noncompliance.')
- Failure to provide complete and accurate information as required by regulations (e.g. 10 CFR 50.9, 'Completeness and Accuracy of Information.')

The significance of violations impacting the regulatory process is determined in accordance with Enforcement Policy and the Enforcement Manual, resulting in the assignment of a severity level (SL) to the violation and, if appropriate, the imposition of a civil penalty (CP).

The significance of findings underlying violations impacting the regulatory process (assuming the underlying performance deficiency is screened to be more-than-minor in accordance with Appendix B, 'Issue Screening,' of this IMC) is determined in accordance with IMC 0609, 'Significance Determination Process,' resulting in the assignment of an ROP significance color (Green, White, Yellow, or Red).

**03.17 Independent Item.** An item used to track information that does not originate in or is typically not documented as a finding in an inspection report but may be referenced in an inspection report to assess plant performance such as an Office of Investigation harassment and intimidation case.

**03.18 Integrated or Independent Inspection Report.** A reactor inspection report that documents the results of inspection **activities** conducted by NRC inspectors within a specified period.

**03.19 Investigation.** The Office of Investigation (OI) may conduct an investigation for alleged wrongdoing (a violation of NRC requirements resulting from discrimination, deliberate misconduct, or careless disregard) by NRC licensees, individuals or organizations who are licensed by the NRC, have applied for NRC licenses, or who are vendors or contractors of NRC licensees. The NRC staff is required to notify OI when a reasonable basis exists for believing that wrongdoing may have occurred. Upon receipt of an OI report involving wrongdoing, the region formulates a proposed enforcement action. The Office of Enforcement (OE), Office of General Council (OGC), region, and program office determine the final action at a subsequent enforcement panel. Discussed in Section 0612-08 'Unresolved Items,' paragraphs 06.04 'Enforcement,' 15.02.c. 'Release of Investigation-Related Information,' and in Appendix B, 'Issue Screening,' of this IMC.

**03.20 Issue of Concern (IOC).** A well-defined observation or collection of observations that is of concern and may or may not involve a performance deficiency. **Discussed further in Appendix B, 'Issue Screening,'** of this IMC.

**03.21 Licensee-Identified.** For the purpose of this inspection manual chapter (IMC), 'licensee-identified' findings are those findings that are **neither** NRC-identified **nor** self-revealing. Most, but not all, licensee-identified findings are discovered through a licensee program or process. **Examples** of licensee programs that likely result in such findings are post maintenance testing, surveillance testing, ASME Section XI testing, drills, critiques, event assessments, evaluations, or audits conducted by or for the licensee. Other

examples of licensee-identified findings are those findings that are identified by the licensee as a result of their deliberate and focused observation during the course of performing their normal duties (e.g., plant operator or other licensee personnel identifying a packing leak on a valve or identifying a valve out-of-position during a routine tour of the facility would be considered licensee-identified, although the individual's duties at the time may not have been to identify these types of deficiencies). Licensee-identified findings are further discussed in Sections 0612-06, 'The Four-Part Format,' 0612-09, 'Closure of LERS and Cited Violations,' 0612-10, 'Licensee-Identified Violations,' paragraph 14.04 'Summary of Findings,' and in Appendix B, 'Issue Screening,' of this IMC.

03.22 Minor Significance. A Performance Deficiency (PD) deemed to be of such low significance that documentation in an NRC inspection report is not normally warranted. This occurs when either (a) the PD is sufficiently similar to one or more "minor" examples *and* dissimilar from the "more-than-minor" examples in Appendix E, 'Examples of Minor Issues' to reasonably conclude that *all* of the minor screening questions in Paragraph 2 of Figure 2, Block 9 guidance, in Appendix B, 'Issue Screening,' of this IMC warrant a "no" answer, or (b) given it is not possible to resolve whether the PD is minor or more-than-minor using Appendix E examples, the PD is evaluated directly against the minor screening questions and the answers to *all* of the questions are "no." Also, see Minor Violation for further discussion regarding PD's involving violations. It should be noted that, on occasion, the PD underlying a more-than-minor TE Violation may be screened minor.

03.23 Minor Violation. A violation that is less significant than a Severity Level IV violation. Minor violations do not warrant enforcement action and are not normally documented in inspection reports. However, all violations, including minor violations, must be corrected. Section 0612-11 'Minor Issues and Minor Violations' of this IMC discusses exceptions. Violations associated with TE are typically screened in accordance with the Enforcement Policy Supplements. Therefore, the Enforcement Policy and the Enforcement Manual must be consulted in screening violations with these attributes. Appendix B, 'Issue Screening,' of this IMC provides screening guidance for findings and associated non-TE violations.

03.24 Non-Cited Violation (NCV). A non-recurring, typically, non-willful, Severity Level IV violation or a non-TE violation typically (but not necessarily) associated with a GREEN ROP FINDING that is not subject to formal enforcement action if the licensee places the violation in a CAP to address recurrence and restores compliance within a reasonable period of time. Provided applicable criteria in the Enforcement Policy and the Enforcement Manual are met, such *issues* are documented as violations, but are not cited in notices of violation, which normally require written responses from licensees.

03.25 Notice of Deviation. A written notice describing a licensee's failure to satisfy a commitment, such as a commitment to conform to the provisions of applicable codes, standards, guides, or accepted industry practices when the commitment, code, standard, guide, or practice involved has not been made a requirement by the Commission.

**03.26 Notice of Violation (NOV).** A written notice setting forth one or more violations of a legally binding requirement. See [10 CFR 2.201, Notice of violation](#).

**03.27 NRC-Identified.** Findings or violations, 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 weakness in the licensee's classification, evaluation, or corrective actions associated with the licensee's correction of a finding.

**03.28 Observation.** A factual detail noted during an inspection. Relevant observations are documented to support inspection findings or unresolved items. Additionally, observations not directly related to a finding may be documented if allowed by an appendix to this chapter or by the specific inspection procedure or temporary instruction. Observations are further discussed in paragraphs [13.02 'Non-Routine Inspections'](#) and [14.06 'Report Details'](#) of this IMC.

**03.29 Performance Deficiency (PD).** An issue that is the result of a licensee not meeting a requirement or standard where the cause was reasonably within the licensee's ability to foresee and correct, and therefore should have been prevented. A performance deficiency can exist if a licensee fails to meet a self-imposed standard or a standard required by regulation, thus a performance deficiency may exist independently of whether a regulatory requirement was violated. Additional discussion can be found in [Appendix B, 'Issue Screening,'](#) of this IMC.

**03.30 Potential Willfulness.** All IOC's are screened by inspectors for indications that the IOC may warrant a closer review by an ARB for potential willful violation. Those IOC's forwarded to the ARB are the product of a preliminary screening determination by inspectors and regional management that (a) the IOC involves a VIOLATION and (b) a sufficient basis exists to warrant ARB review. IOC's forwarded to the ARB in this way are said to exhibit *potential* willfulness. The determination of willfulness is, however, a legal decision that can only be made by the Office of General Council using facts developed during an investigation conducted by the Office of Investigations, normally conducted at the recommendation of the ARB. See [03.50 Willfulness](#), below, for additional insights.

**03.31 Potentially Generic Issue.** An inspection finding that may have implications for other licensees, certificate holders, or vendors whose facilities or activities are of the same or similar manufacture or style.

**03.32 Potentially Greater than Green.** A finding that could not be screened to green using the [IMC 0609, 'Significance Determination Process'](#) prior to exiting the inspection that identified the finding and issuing the associated inspection report.

**03.33 Preliminary Greater than Green.** A finding that has been reviewed by the Significance and Enforcement Review Panel (SERP) as described in [Attachment 1 to Manual Chapter 0609, 'Significance and Enforcement Review Panel Process'](#). Until the significance of a finding has been finalized, it may be characterized in an inspection report

as an Apparent Violation (AV), if a violation is involved, or as a Finding (FIN) to-be-determined (TBD) if no violation is being considered.

03.34 Present Performance. The Enforcement Policy and the Enforcement Manual consider enforcement discretion for violations involving old design issues based, in part, on whether the violations were caused by conduct linked to present performance. Violations that are at least 3 years old and meet certain other conditions are normally not considered to be reflective of present performance. Following the above precedent, present performance is used in Appendix B, 'Issue Screening,' of this IMC to describe those performance characteristics described by (or associated with) a potential CCA that occurred within the past 3 years.

03.35 Red Finding. A finding of high safety significance as determined by IMC 0609, 'Significance Determination Process.'

03.36 Requirement. As used in the context of this IMC, requirement means a legally binding obligation such as a statute, regulation, license condition, technical specification, or order that is enforceable by the NRC. In this context, statutes and regulations that are not enforceable by the NRC are not requirements although they may trigger licensees to establish standards or self-imposed standards.

03.37 Safety-Conscious Work Environment (SCWE). An environment in which employees feel free to raise safety concerns, both to their management and to the NRC, without fear of retaliation and where such concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback to employees.

03.38 Standard or Self-Imposed Standard. As used on the context of this IMC and in Appendix B, 'Issue Screening,' of this IMC, a standard is a licensee-established expectation that does not constitute a requirement, as defined above. Licensees establish standards in a variety of ways. Paragraph 5, 'Performance Deficiency Basis,' of IMC 0308 Attachment 3, 'Significance Determination Process Basis Document,' establishes that, in order to identify a performance deficiency, staff must make a reasonable determination that the licensee intended to meet some requirement or standard and they did not, having had the opportunity to do so. Industry Codes and Standards, unless adopted by the licensee or incorporated into a requirement, do not constitute an independent basis for a performance deficiency. The determination of an unmet standard requires application of experience, training, and judgment, in the context of the above guidance.

03.39 Self-Revealing. For the purpose of **screening and** documentation in the ROP, self-revealing findings are those findings **developed from issues** 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. Self-revealing **issues** 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 and require minimal analysis to detect. Self-revealing findings are **derived from self-revealing issues and are treated similarly to** NRC-identified findings for the purposes of **screening and documentation**.

Examples of self-revealing issues include those revealed through: reactor trips and secondary plant transients; failure of emergency equipment to operate; unanticipated or unplanned relief valve actuations; obvious failures of fluid piping or plant equipment; identification of large quantities of water in areas where you would not normally expect such a condition; and non-compliance with high radiation area requirements that, in some cases, was identified through an electronic dosimeter alarm.

03.40 Sensitive Unclassified Non-Safeguards Information (SUNSI). Means any information of which the loss, misuse, modification, or unauthorized access can reasonably be foreseen to harm the public interest, the commercial or financial interests of the entity or individual to whom the information pertains, the conduct of NRC and Federal programs, or the personal privacy of individuals. The NRC policy for handling, marking, and protecting SUNSI is available on the NRC Public Web site at <http://www.nrc.gov/reading-rm/doc-collections/commission/comm-secy/2005/2005-0054comscy-attachment2.pdf>. Additional staff guidance for handling of SUNSI is published on the NRC internal WEB site.

03.41 Severity Levels. Are used (1) to indicate significance of a violation evaluated under TE; and (2) to determine the appropriate enforcement action to be taken.

03.42 Significant or Significance. The significance of a finding, in the context of this IMC, is a measure of the finding's safety or security impact as determined by [IMC 0609, 'Significance Determination Process.'](#)

The phrase 'no findings of significance,' was formerly used in power reactor inspection reports, to mean 'no performance deficiencies of more-than-minor significance were identified' in accordance with the screening process described in [Appendix B, 'Issue Screening'](#). The phrase 'no findings of significance' has been replaced with 'no findings.'

03.43 Significance and Enforcement Review Panel (SERP). A designated panel of NRC personnel that provides a management review of the preliminary significance characterization and basis of findings that are potentially Greater than Green. No official agency preliminary significance determination of White, Yellow, Red, or greater than Green will be made without a SERP review. Additional insights are provided in [Inspection Manual Chapter 0609 Attachment 1, 'Significance and Enforcement Review Panel Process.'](#)

03.44 Significance Determination Process (SDP). The process described in [IMC 0609, 'Significance Determination Process,'](#) and associated appendices that is applied to an inspection finding to determine its safety or security significance as either Green (very low), White (low-to-moderate), Yellow (substantial), or Red (high).

03.45 To Be Determined (TBD). The inspection report characterization that is required by [IMC 0609, 'Significance Determination Process,'](#) if the staff's significance determination of a finding is not complete at the time of issuance of the inspection report, and not reviewed by the SERP. Final significance determination should be completed within 90 days from the issue date of the first official correspondence that describes a finding as TBD.

03.46 Traditional Enforcement (TE). The enforcement approach in which the significance of violations is reflected by a severity level (SL) ranging from the lowest, SL-IV, to the

highest, SL-I, and, when appropriate, the imposition of a civil penalty (CP) in accordance with the Enforcement Policy and the Enforcement Manual. TE is applied to violations associated with (a) willfulness, (b) impacting the regulatory process, or (c) actual safety consequences. See 03.50 Willfulness, 03.16 Impacts the Regulatory Process, and 03.01 Actual Consequences, as necessary, for additional insights. Conversely, the enforcement approach in which the significance of violations is reflected by a color ranging from the lowest (green), to the highest (red), as determined by the SDP, may be referred to as non-TE.

**03.47 Unresolved Item (URI).** An issue of concern about which more information is required to determine (a) if a performance deficiency exists, (b) if the performance deficiency is more than minor, or (c) if the issue of concern constitutes a violation. Such a matter may require additional information from the licensee or cannot be resolved without additional guidance, clarification, or interpretation of the existing guidance. The URI type code shall not be used while determining the significance of a finding or violation or while determining whether or not a violation warrants enforcement discretion. See 03.03, 'Apparent Violation (AV),' and 03.45, 'To Be Determined (TBD),' for discussion of type codes applicable to such scenarios.

**03.48 Violation (VIO).** The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification. The Acronym 'VIO' is used in inspection reports and in RPS to reflect cited violations. A VIO may be associated with a finding or it may not. Similarly, a VIO may be associated with TE (see above) or with non-TE. VIO may also be used to document a Backfit item involving a failure to comply with a legally binding regulatory requirement.

**03.49 White Finding.** A finding of low to moderate safety significance as determined by IMC 0609, 'Significance Determination Process.'

**03.50 Willfulness.** The terms "willful" or "willfulness," as used in this IMC, refer to conduct involving either a careless disregard for requirements or deliberate intent to violate requirements or falsify information. Willful violations are of particular concern to the Commission because its regulatory program is based on licensees and their contractors, employees, and agents acting with integrity and communicating with candor. A violation may be considered more significant than the underlying noncompliance if it includes indications of willfulness. See 03.30 Potential Willfulness, above, and the Enforcement Policy, the Enforcement Manual, and Management Directive 8.8 'Management of Allegations' for additional insights regarding willfulness. See 10 CFR 50.5, 'Deliberate misconduct,' for associated regulations.

**03.51 Yellow Finding.** A finding of substantial safety significance as determined by IMC 0609, 'Significance Determination Process.'

## 0612-04 RESPONSIBILITIES

04.01 General Responsibilities. Each inspection of a reactor facility shall be documented in a report consisting of a cover letter, a cover page, a summary of findings or summary of issues, inspection details, and supplemental information.

### 04.02 Inspectors.

- a. All NRC power reactor inspectors are required to prepare inspection reports in accordance with the guidance provided in this manual chapter.
- b. Inspectors have the primary responsibility for ensuring that inspection results are properly characterized, accurately reported, and that referenced material is correctly documented.
- c. Inspectors are responsible for ensuring that the content of the inspection report does not conflict with the information presented at the exit meeting.

### 04.03 Branch Chiefs and Division Directors.

- a. A manager familiar with NRC requirements in the inspected area shall review each inspection report to ensure that the report follows the format given in this chapter.
- b. The management reviewer shall ensure that inspection findings are consistent with NRC policies and technical requirements, and ensure that violations are addressed in accordance with the [Enforcement Policy](#) and the [Enforcement Manual](#).
- c. The management reviewer shall ensure that significance determinations made in the inspection report are in accordance with [Appendix B, 'Issue Screening,'](#) of this IMC, [IMC 0609, 'Significance Determination Process,'](#) and the [Enforcement Policy](#), as applicable.
- d. The applicable division director or designated branch chief is responsible for the content, tone, overall regulatory focus, and timeliness of regional inspection reports.

04.04 Division of Inspection and Regional Support. The Reactor Inspection Branch is responsible for providing interpretations of the information contained in this manual chapter, for answering questions related to the guidance, and for providing guidance for situations not covered in this manual chapter.

## 0612-05 SCREENING INSPECTION RESULTS

The screening of inspection results is addressed in [Appendix B, 'Issue Screening,'](#) of this IMC.

## 0612-06 THE FOUR-PART FORMAT

This section provides instructions for documenting issues using the four-part format. The four-part format is discussed in detail below and organized as follows:

- [06.01 Introduction](#)
- [06.02 Description](#)
- [06.03 Analysis](#)
- [06.04 Enforcement](#)

The four-part format is primarily utilized for issues that terminate [Appendix B, 'Issue Screening,'](#) of this IMC, at Figure 3, Block 18 (Confirmed Finding with CCA), Figure 1, Block 24 (Confirmed Willful TE Violation), Figure 2, Block 35 (Confirmed Non-Willful TE Violation), and Figure 3, Block 46 (Confirmed Finding – No CCA). Additional guidance for documenting issues terminating [Appendix B, 'Issue Screening,'](#) at other less-common process points is discussed as follows:

- [0612-07, 'Violations Without Performance Deficiencies,'](#) for issues terminating in Figure 2, Block 34 (More-than-minor non-Finding (non-TE) Violation). Also see [IMC 0305, 'Operating Reactor Assessment Program,'](#) for additional guidance on documenting old design issues under their applicable inspection areas.
- [0612-08, 'Unresolved Items,'](#) for issues terminating in Figure 2, Block 31 (Document URI – Continue to Inspect – Re-enter at Block 6)
- [0612-09, 'Closure of LERS and Cited Violations,'](#) for documenting findings associated with Licensee Event Reports (LER's) and Cited Violations (No specific App B termination block).
- [0612-10, 'Licensee-Identified Violations,'](#) for issues terminating in Figure 3, Block 43 (Doc. Abbreviated Finding in 40A7 – no CCA) or Block 44 (Doc. FIN (TBD) or AV; Re-enter at Block 42)
- [0612-11, 'Minor Issues And Minor Violations,'](#) for certain issues terminating in Figure 2, Block 36 (No Finding)

Findings involving violations for which enforcement discretion has been granted will normally be documented using the four-part format under the applicable inspectable area. However, when discretion is granted in accordance with an Enforcement Guidance Memorandum (EGM), the EGM should be consulted for additional guidance which could direct deviation from the four-part format described below.

Findings involving multiple examples may be documented as a single finding which will be entered as a single PIM entry, and will be assigned a single tracking number. [Exhibit 3, 'Sample Reactor Inspection Report,'](#) of this IMC illustrates the variety of reporting formats discussed above.

06.01 Introduction. The introduction should be one or two sentences that provide a brief discussion of the finding or TE violation. This section does not need to stand alone because the description that follows will provide the supporting details.

The introduction must include:

- The performance deficiency (standard or requirement that should have been met but was not);
- The finding significance color (severity level for a TE violation);
- The identification credit (self-revealing, NRC-identified, or Licensee-identified);
- For findings with non-TE violations or for independent TE violations, the requirement violated and whether it is being cited- [NOV] or non--cited [NCV]; and
- Cross-reference (as appropriate) to the underlying finding when documenting a TE violation or to the TE violation when documenting the underlying finding.

When a TE violation and underlying finding are documented in the same inspection report, documentation may be consolidated into a common four-part format.

06.02 Description. Describe the issue with sufficient detail commensurate with the significance of the finding (or severity level of the TE violation) for the reader to understand the issue or event, the standard(s) and/or requirement(s) violated, the evaluation of significance (or severity), applicable cross-cutting attributes (for findings only – not TE violations), and, if applicable, why the violation was cited- or non-cited. Include a description of any positive licensee performance that mitigated a potential problem and influenced the significance of the finding or severity level of the TE violation. The description content must be complete because the addition of new information is not permitted in the Analysis and Enforcement Sections.

Findings with potential generic concerns should include specific details to identify the concern. Information documented in the TE violation, as referenced in the introduction, need not be replicated.

Information need not be replicated if, for a TE violation, it was sufficiently captured in the underlying finding, or, for a finding, it was sufficiently captured in the associated TE violation and referenced in the Introduction section.

06.03 Analysis. Describe the logic used to determine the performance deficiency (or TE violation), the bases for determining it to be more than minor, the significance of the finding (or severity level of the TE violation), and applicable cross-cutting aspect(s) of the finding (only findings are screened for cross-cutting aspects). The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusion. Findings underlying TE violations need not replicate information documented in the violation and vice-versa. See the sample report for examples.

- a. The first part shall include the following attributes:
  1. For a finding, include a concise restatement of the performance deficiency (i.e., the issue that is the result of the licensee not meeting a requirement or standard where the cause was reasonably within the licensee's ability to foresee and correct, and that should have been prevented);
  2. For a TE violation, include the TE attribute (i.e. willfulness, impacting regulatory process, or actual consequence); and
  3. For either a Finding or a TE violation, include the specific circumstances supporting the "more than minor" determination.
- b. The second part should include the specific basis for the determination of the significance color of the finding (or the severity level and, if appropriate, the civil penalty of the TE violation) so the reader can independently arrive at the same conclusion. Specific guidance based on the method used for determination of significance (or severity level) is provided below:
  1. For a TE violation, describe the significance information and the logic used to determine the severity level of the violation and, if applicable, the civil penalty. Include reference to Enforcement Policy supplements, as applicable. The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusion. Information documented in the underlying finding, as referenced in the introduction, need not be replicated.
  2. For a finding involving risk-Informed SDP results from IMC 0609 Appendices A, F, G, H and K.
    - (a) If SDP phase 1 screening assesses the finding as very low safety significance (Green), the analysis shall identify:
      - (1) The affected cornerstone;
      - (2) The SDP used in the determination and the reason it applies;
      - (3) The assumptions used in the determination; and,

- (4) The phase 1 question that was satisfied that caused the finding to be assessed as Green (e.g., “The loss of function did not exceed the allowed out of service time”). (if applicable)
- (b) If the SDP phase 1 screening results in a phase 2 or 3 evaluation, the analysis shall also include:
    - (1) The phase 1 criteria that was satisfied that caused the finding to be assessed through phase 2;
    - (2) The most dominant core damage sequences, including the remaining mitigation capability that limited the significance; and
    - (3) The resulting color (i.e., Green, etc.).
  - (c) For findings that are potentially greater than Green, in addition to (b) above, the analysis should use the risk characterization as determined by the Significance Determination Enforcement Review Panel (SERP) as its basis and should identify:
    - (1) The exposure time;
    - (2) Recovery credit;
    - (3) Most dominant sequences greater than Green;
    - (4) Why the finding does not present an immediate safety concern;
    - (5) Compensatory measures in place while licensee long-term corrective measures are being implemented (if appropriate);
    - (6) The significance attributed to the finding by the licensee (if available at the time of documentation). If the significance is different than that determined by the NRC, then describe the assumptions used by the licensee, and identify what the licensee considered applicable to its determination that the NRC did not consider; and
    - (7) A statement designating the significance of the finding as “To Be Determined (TBD).” Emphasize that the safety characterization is not yet finalized. Do not make direct statements regarding safety significance in the inspection report when the agency has not yet reached a conclusion.

3. For a finding involving deterministic SDP Results from IMC 0609 Appendices B, C, D, E, I, J, L and M.

- (a) The analysis shall include:

- (1) The affected cornerstone;
  - (2) The SDP used in the determination and why it applies;
  - (3) Any assumptions used in the determination;
  - (4) The table or flowchart used;
  - (5) A description of the path on the flow chart used to arrive at the conclusion, if applicable; and
  - (6) The resulting color.
- (b) For findings that are Potentially Greater than Green, in addition to (a) above, the analysis shall describe the risk characterization or other basis as determined by the SERP and the following:
- (1) Why the finding does not present an immediate safety concern;
  - (2) Compensatory measures in place while licensee long-term corrective measures are being implemented (if appropriate);
  - (3) The significance attributed to the finding by the licensee (if available at the time of documentation). If the significance is different than that determined by the NRC, then describe the assumptions used by the licensee, and identify what the licensee considered applicable to its determination that the NRC did not consider; and
  - (4) A statement designating the significance of the finding as “To Be Determined (TBD).” Emphasize that the safety characterization is not yet finalized. Do not make direct statements regarding safety significance in the inspection report when the agency has not yet reached a conclusion.

c. The third part of the analysis section **for a finding** should include the basis for assigning or not assigning the cross-cutting aspect, if applicable **(TE violations are not screened for CCAs – only findings are screened)**. Specifically:

1. If the finding has a cross-cutting aspect, inspectors shall restate the cross-cutting area, the component, and the cross-cutting aspect as described in **IMC 0310, 'Components Within the Cross Cutting Areas,'** including the alphanumeric identifier for the cross-cutting aspect, **the primary cause of the finding, and how that cause was determined**;
2. If it was determined the performance deficiency does not have a cross-cutting aspect, the analysis section must include a statement briefly stating the reason for not assigning a cross-cutting aspect; and

3. If the licensee provides new information after the inspection report is issued, this information will be assessed to determine if a change in the original cross-cutting aspect of the finding is appropriate. Section 14.06 provides guidance on documentation if a change is warranted.

06.04 Enforcement. Describe any applicable enforcement action associated with the finding (or TE violation). Findings found or reviewed during inspections that involve violations of regulatory requirements are documented in accordance with the [Enforcement Policy](#) and the guidance provided below. The enforcement discussion and subsequent enforcement action must be consistent with the significance (or severity level) determination.

Neither speculate nor draw 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 an inspection report could result in later conflicts based on additional input and review. Inspection reports that include potentially willful violations or that contain material that may be related to an ongoing investigation must be reviewed by OI and the Office of Enforcement (OE) prior to issuance. See Figure 1 in [Appendix B, 'Issue Screening,'](#) of this IMC.

In addition, [10 CFR 50, Appendix B, 'Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,'](#) Criterion XVI violations for failure to 'preclude repetition' can only be written for significant conditions adverse to quality (SCAQ). The inspection report details must clearly address (a) the basis for determining the previous condition was a SCAQ (e.g., the condition meets the definition of a SCAQ per the licensee's corrective action program), (b) the relationship between the previous SCAQ and the current one, and (c) the corrective actions from the previous SCAQ that failed to prevent recurrence.

Document the enforcement attributes of the finding (or TE violation) as described below: (See Section [0612-14 'Compiling an Inspection Report,'](#) for guidance on tracking number assignment.)

- a. For a finding without an associated violation, the enforcement section shall include the following:

A statement similar to "This finding does not involve enforcement action because no regulatory requirement violation was identified"; and

1. If the finding is Green, "Because this finding does not involve a violation and has very low safety significance, it is identified as FIN [Tracking Number], Title."; or
2. If the finding is potentially greater than Green, "Because this finding does not involve a violation but has potentially greater than very low safety significance (to be determined), it is identified as FIN (TBD) [Tracking Number], Title;" or

- b. For a finding with **associated (non-TE) violation and for separate TE violations**, the enforcement section shall include the following (with exceptions noted below):
  1. What requirement was violated;
  2. When the violation occurred and how long it existed;
  3. Any actual or potential safety consequence;
  4. Immediate corrective actions taken to restore compliance;
  5. A reference to the licensee's corrective action document number;
  6. Specific enforcement actions; and
  7. Tracking number resulting from the violation. (e.g., NCV or NOV [Tracking Number], Title).
  8. **A statement similar to:**
    - (a) For findings **with (non-TE) NCVs** of very low safety significance **and for TE Level IV NCVs**, "Because this violation was of very low safety significance and it was entered into the licensee's corrective action program, this violation is being treated as an NCV, consistent with the [Enforcement Policy](#)."
    - (b) **For non-TE NOV's**, "Because the licensee failed to (correct the violation, enter the condition into the corrective action program, prevent recurrence), this violation is being treated as a NOV, consistent with the [Enforcement Policy](#)."
    - (c) For TE NOV's, "This is a violation of [requirement]. A Notice of Violation is attached."
    - (d) For a violation involving enforcement discretion, "A violation of [requirement] was identified. However, because conditions of Enforcement Guidance Memorandum [XX-XXX] for enforcement discretion were satisfied, the NRC is exercising enforcement discretion to not cite the violation."
  9. Also for NOV's, see the [Enforcement Manual](#) for guidance on developing the notice and cover letter.
- c. For a finding with a **non-TE violation (or TE violation)** in which enforcement discretion is applied, work with the Office of Enforcement through the Regional Enforcement Coordinator to develop appropriate wording for the Enforcement Section. See the [Enforcement Manual](#) for standard paragraphs to be included.

## 0612-07 VIOLATIONS WITHOUT PERFORMANCE DEFICIENCIES

Occasionally, a (non-willful, more-than-minor) violation will be identified without an associated performance deficiency (e.g. Staff determine there was a failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification, but that the cause of the violation was not reasonably within the licensee's ability to foresee and prevent.)

However, when a violation is more than minor, it must be dispositioned in an inspection report. The [Enforcement Policy](#) states that the agency may exercise enforcement discretion. A violation that does not involve a performance deficiency may warrant enforcement discretion. As stated previously, this type of violation is not a finding and therefore, will not be documented using the four-part format.

Work with the Office of Enforcement through the Regional Enforcement Coordinator to determine the appropriate action. Also, see [Enforcement Manual](#) Chapter 5 for additional guidance. Consider the following two-part format for non-TE violations:

For a non-TE violation, the first part need not be lengthy but will describe:

- the issue of concern,
- why there was no performance deficiency, and
- the safety significance and sufficient detail to determine how it was determined.

Assuming the agency exercises enforcement discretion, the second part will describe the requirement violated and include the following statement:

“However, because no performance deficiency was identified, no enforcement action is warranted for this violation of NRC requirements in accordance with the NRC's [Enforcement Policy](#). Further, because licensee actions did not contribute to this violation, it will not be considered in the assessment process or NRC's Action Matrix.”

No tracking number is assigned and no RPS/PIM entry for these violations is required. Also, these violations are not documented in the Summary of Findings. The cover letter shall contain the required language used for exercising enforcement discretion. See Section [0612-14.01, Cover Letter](#), for additional guidance.

Minor violations are not routinely documented in inspection reports regardless of whether or not a performance deficiency exists. Exceptions are discussed in Section [0612-11, 'Minor Issues and Minor Violations.'](#)

For TE violations, follow applicable guidance in Section [0612-06, 'The Four-Part Format.'](#)

## 0612-08 UNRESOLVED ITEMS

08.01 Opening. An inspector should open an unresolved item (URI) when an issue of concern is identified but more information is required to determine, 1) if there is a performance deficiency, 2) if the performance deficiency is more than minor, or 3) if the issue of concern constitutes a violation (e.g. When [Appendix B, 'Issue Screening,'](#) of this IMC, terminates at Figure 2, Block 31). An URI cannot be used nor should a finding (TBD) or apparent violation (AV) remain undocumented in order to obtain more information to determine the significance of a finding (e.g. When [Appendix B, 'Issue Screening,'](#) of this IMC, terminates at Figure 3, Block 44).

A Block 31 [Appendix B, 'Issue Screening,'](#) termination may require additional information from the licensee or may require additional guidance, clarification, or interpretation of the existing guidance (e.g., performance indicator reporting guidance, OI investigation in progress) before it can be resolved. A URI may also be opened when a Notice of Enforcement Discretion (NOED) is granted until sufficient additional information concerning the cause or need for the NOED can be obtained to complete the [Appendix B, 'Issue Screening,'](#) process. The action of documenting an unresolved item is a commitment of future resources. A URI shall not be opened to track completion of licensee's actions associated with a finding or an inspection question.

The URI should be documented using the Introduction and Description Sections discussed in Section [0612-06, 'The Four-Part Format.'](#) Because URIs are not findings, the Analysis and Enforcement Sections are not required. The Introduction Section should clearly state that an URI was identified. The Description Section should describe the issue with sufficient detail to allow another inspector to complete the inspection effort, if necessary. Include details related to the Notice of Enforcement Discretion, if applicable. The report must clearly identify the specific licensee or NRC actions needed to resolve the issue. Include a tracking number for the URI in accordance with Section [0612-14 'Compiling an Inspection Report.'](#)

Unresolved items are not documented in the summary of findings section or in the inspection report cover letter.

08.02 Follow-up and Closure. The level of detail devoted to closing URIs depends on the nature and significance of the additional information identified. The closure of an URI must summarize the topic, summarize the inspector's follow-up actions, evaluate the adequacy of any licensee actions, determine if a violation has occurred, and provide enough detail to justify closing the item. If resolution to an URI was based on discussions between inspector(s) and Nuclear Reactor Regulation (NRR) technical staff(s), concisely document the details of these discussions as the basis for the regulatory decision. Additionally, branch chiefs of inspector(s) and technical staff(s) who were involved in these discussions should concur on the inspection report.

If a finding is identified, follow the guidance of Section [0612-06, 'The Four-Part Format.'](#) The finding and/or associated violation should be documented in an inspectable area section, likely under the procedure in which the original URI was documented.

If no findings or violations were identified, document the resolution in Section 4OA5 of the report.

## 0612-09 CLOSURE OF LERs AND CITED VIOLATIONS

09.01 Document reviews and closures of LERs, including revisions to LERs, in the inspection report under Section 4OA3, "Event Follow-up." If inspection documentation in another cornerstone area provides a description of the event in the LER (i.e., personnel performance during surveillances), then that section of the report should be referenced under Section 4OA3 with a very brief description.

In general, LER reviews should have a brief description of the event and reference the docketed LER. If an LER review is already documented in a separate NRC correspondence, then close the LER with a brief statement in an inspection report referencing the separate correspondence.

The event described in the LER needs to be evaluated for a potential violation and must be identified clearly in the inspection report as a cited violation, non-cited violation or as a minor violation, as appropriate, or warranting enforcement discretion if no performance deficiency occurred. Screen any violations in accordance with [Appendix B, 'Issue Screening,'](#) of this IMC. In addition to the information described above, document closure of the LER as follows:

- a. No Violations, Licensee-identified Green Findings, or No Findings: State the LER was reviewed and that no findings were identified and no violation of NRC requirements occurred.
- b. Minor Violations. Use guidance in Section [0612-11, 'Minor Issues And Minor Violations.'](#)
- c. NRC-Identified or Self-Revealed Findings or Violations or Significant Licensee-Identified Violations and Findings: The four part format in Section [0612-06 'The Four-Part Format,'](#) must be followed if not previously documented.
- d. Licensee-identified NCVs. The safety significance and enforcement should be discussed per Section [0612-10, 'Licensee-Identified Violations,'](#) and not in the LER closeout section. A statement, such as "The enforcement aspects of this finding are discussed in Section 4OA7," should be included in the LER closeout section.

09.02 Document the closure of cited violations in Section 4OA5. The level of detail required to document closure of cited violations depends on the extent of corrective actions conducted by the licensee. In general, the write-up must summarize the inspector's follow-up actions which evaluated the adequacy of any licensee actions and provide enough detail to justify closing the violation. The closure documentation should consist of a few paragraphs. Refer to [IP 92702, 'Follow-up on Corrective Actions for Violations and Deviations,'](#) for further guidance.

## 0612-10 LICENSEE-IDENTIFIED VIOLATIONS

NRC policy requires that all documented non-compliances be dispositioned in accordance with the [Enforcement Policy](#), regardless of who identified them. However, licensee-identified violations that are of very low safety significance (**Green**) for which appropriate corrective actions have been developed (Figure 3, Block 43 of [Appendix B, 'Issue Screening,'](#) of this IMC) should be minimally documented in Section 4OA7. See Section [0612-03, 'Glossary,'](#) for discussion of 'licensee-identified,' 'self-revealing,' and 'NRC-identified.'

- a. **Potentially greater than Green** – If the finding has been screened and found to be potentially greater than Green (Figure 3, Block 14 of [Appendix B, 'Issue Screening,'](#) of this IMC), it must be documented in accordance with Section [0612-06, 'The Four-Part Format,'](#) of this IMC. The finding should be documented in the appropriate inspectable area and Summary of Findings. The documentation should state that the finding is licensee identified.
- b. **Green Violation** – If the finding involves a violation of very low safety significance (**Green**) and the licensee has correctly evaluated the finding and developed appropriate corrective actions, than it should be briefly described in Section 4OA7 (Figure 3, Block 43 of [Appendix B, 'Issue Screening,'](#) of this IMC).

Include the requirement(s) violated, describe how it was violated, identify the licensee's corrective action tracking number(s), and provide a very brief justification why the violation is not greater than Green. A complete reconstruction of the SDP logic is not required. However, Section 4OA7 must include the following introductory paragraph:

"The following violations of very low safety significance (Green) or Severity Level IV were identified by the licensee and are violations of NRC requirements which meet the criteria of the NRC [Enforcement Policy](#), for being dispositioned as a Non-Cited Violation."

NOTE: In accordance with the [Enforcement Policy](#), the approval of the Director, Office of Enforcement, with consultation with the Deputy Executive Director as warranted, is required for dispositioning willful violations as NCVs.

- c. **NRC added value** – If a problem exists with the licensee's evaluation or corrective actions associated with the finding and if further inspection added significant value, then document the finding as a NRC-identified finding under the applicable cornerstone section of the report in accordance with Section [0612-06, 'The Four-Part Format,'](#) of this IMC. Documentation should clearly emphasize that the licensee identified the issue but failed to recognize or correct the problem identified by the inspector.

## 0612-11 MINOR ISSUES AND MINOR VIOLATIONS

Minor violations are not routinely documented in inspection reports. However, as stated in the [Enforcement Policy](#) and [Enforcement Manual](#), there may be exceptions. Documenting a minor violation may be warranted as part of closing out an LER, Unresolved Item, or follow-up to an allegation. Licensees are required to correct minor violations. When it is necessary to document a minor violation, only minimal discussion is required. Briefly describe the issue of concern, state that the issue has been addressed by the licensee and include the following:

“This failure to comply with [requirement] constitutes a violation of minor significance that is not subject to enforcement action in accordance with the NRC’s [Enforcement Policy](#).”

An issue of concern, regardless of whether it involves a violation of requirements, may be documented if related directly to an issue of agency-wide concern, if allowed by an appendix to this chapter, or by the specific inspection procedure or temporary instruction. In addition, limited documentation of the NRC’s review of events associated with radioactive leaks and spills should be provided in the inspection report for those leaks and spills reported to State and local authorities even when there were no performance deficiencies identified or the finding is determined to be minor.

When it is necessary to document a minor issue, only minimal discussion is required. Briefly describe the issue of concern and state that the issue has been addressed by the licensee, if applicable.

## 0612-12 PERFORMANCE INDICATOR VERIFICATION

All performance indicator (PI) verification baseline inspections shall be documented under Section 4OA1.

12.01 Scope. When writing the scope section, include the time period for which the PI data was verified. Include the criteria used to verify the PIs. List the PIs verified and the associated cornerstones. When there are findings to report, list the individual PI scope and findings separately.

12.02 Findings. When assessing PIs, if the inspector identifies an error that, upon correction by the licensee, resulted in the licensee crossing a PI threshold, the issue needs to be documented in the Findings section in accordance with Section 06 of this chapter. Briefly describe the circumstances surrounding the finding in the write-up. Inaccurate and incomplete PI data violations should be dispositioned in accordance with the guidance in the [Enforcement Policy](#) and [Enforcement Manual](#).

If the inspector disagrees with the licensee’s data or the licensee’s interpretation of the reporting guidance, the issue will be resolved using the inspection feedback process and/or PI frequently asked questions (FAQs) process and should be identified as an URI in accordance with Section [0612-08, ‘Unresolved Items.’](#) The region should contact the Performance Assessment Branch of NRR and submit a feedback form capturing their

concerns and perspectives. Upon resolution of all interpretation issues and the FAQ, the issue should be closed in accordance with the closure guidance described in [IMC 0608, 'Performance Indicator Program.'](#)

## 0612-13 OTHER GUIDANCE

**13.01 Treatment of Third Party Reviews.** Detailed NRC reviews of Institute of Nuclear Power Operations (INPO) evaluations, accreditation reports, findings, recommendations, and corrective actions, or other third party reviews with similar information are not referenced in NRC inspection reports, tracking tools, or other agency documents unless the issue is of such safety significance that no other reasonable alternative is acceptable. INPO findings, recommendations and associated licensee corrective actions are not normally tracked by the NRC. If a finding warrants tracking, it should be independently evaluated, documented, and tracked as an NRC finding in Section 4OA5.

INPO findings, recommendations, corrective actions, and operating experience which are placed in the licensee's corrective action program, can be considered appropriate for inspection. Additionally, when documenting review of these issues which originated from INPO, inspection reports should not refer to any proprietary INPO reports or documents, INPO reference numbers, or identify specific sites when referencing operating experience. If it is necessary to document review of an INPO document (i.e., an evaluation referring to the INPO document was an inspection sample or justification for a cross-cutting aspect), then state the reference number of the reviewed item (e.g., condition report or evaluation number) and provide general words for the title, if applicable. For example, "Condition Report No. 235235 concerning industry information on pumps."

Include a short statement in the inspection report to document that a review of a specified INPO evaluation or accreditation report was completed. Do not include a recounting or listing of INPO findings or reference a final INPO rating when documenting an INPO evaluation or accreditation report review. Discuss the specifics of any significant differences between NRC and INPO perceptions with regional management.

**13.02 Non-Routine Inspections.** Document in Section 4OA4 activities related to Supplemental Inspections. Document in Section 4OA5 inspection results from [IMC 2515 Appendix C, Temporary Instructions \(TIs\)](#) and other non-routine inspection activities not addressed in this manual chapter. In some cases, factual observations may be documented. If it is necessary to document a minor issue or minor violation, follow the guidance in Section [0612-11, 'Minor Issues and Minor Violations.'](#)

**13.03 Documenting Backfit Items.** When a backfit is identified, it is necessary to track the completion of the licensee's actions to correct the identified condition. Document this tracking in Section 4OA5 and classify the backfit item as a VIO. When inputting into RPS, enter the following:

"This issue is a compliance backfit. By definition, the licensee was put on notice that they are in violation. This item was created to ensure appropriate NRC inspection of the licensee's corrective actions required to ensure compliance -

similar to follow-up from an NOV. The inspection report issued this concern as a VIO.”

13.04 Treatment of Sensitive Unclassified Non-Safeguards Information (SUNSI) in Non-Security Related Reports. SUNSI shall not be made publicly available and shall be segregated from other portions of the report which are to be made publicly available. This can typically be accomplished by creating and referencing a separate report enclosure which can be profiled in Agencywide Documents Access and Management System (ADAMS) as “Non-Publicly Available.” The documents containing SUNSI shall be marked in accordance with Management Directive 12.6, ‘NRC Sensitive Unclassified Information Security Program.’ Security inspection reports shall not be used to document inspection activities or findings that fall outside of the security cornerstone unless otherwise directed. The NRC policy for handling, marking, and protecting SUNSI is publicly available on the NRC Public Web site at <http://www.nrc.gov/reading-rm/doc-collections/commission/comm-secy/2005/2005-0054comscy-attachment2.pdf>. Additional staff guidance for handling of SUNSI is published on the NRC internal WEB site at <http://www.internal.nrc.gov/sunsi/>.

## 0612-14 COMPILING AN INSPECTION REPORT

Each inspection report will have a cover letter, cover page, summary of findings, report details, and attachments as described in this section. A table of contents and summary of plant status may be provided as discussed below. A standard inspection report outline is shown in [Exhibit 1, ‘Standard Reactor Inspection Report Outline,’](#) of this IMC. The following additional guidance applies:

- Supplemental inspection results must also reflect the additional guidance provided in [Appendix C, ‘Guidance for Supplemental Inspection Reports,’](#) of this IMC.
- [IP-71152, ‘Problem Identification and Resolution,’](#) results have varying thresholds for documentation and must reflect the guidance provided in [Appendix D, ‘Guidance for Documenting Inspection Procedure 71152, Problem Identification and Resolution,’](#) of this IMC.
- Escalated enforcement actions and cited violations must reflect the guidance found in the [Enforcement Manual](#), Appendix B, “Standard Formats for Enforcement Packages”; and
- Issues which are subject to enforcement discretion must reflect the guidance found in the [Enforcement Manual](#) and Section 12.01 in [IMC 0305, ‘Operating Reactor Assessment Program’](#) of this IMC.

14.01 Cover Letter. Write a cover letter to transmit the overall inspection results and convey the inspection findings to the licensee. Inspection reports are sent from the applicable NRC official (branch chief, division director, or regional administrator) to the designated licensee executive. See [Exhibit 2, 'Inspection Report Documentation Matrix,'](#) of this IMC for what should and should not be documented in the inspection report cover letter. See [Exhibit 4, 'Sample Cover Letters,'](#) of this IMC for examples.

Guidance and cover letter formats for transmitting enforcement actions vary. Guidance and sample cover letters for enforcement-related correspondence are found in the [Enforcement Manual](#), Appendix B, 'Standard Formats for Enforcement Packages.'

Cover letter content varies somewhat depending on whether or not the inspection identified findings. In general, however, every cover letter has the same basic structure as follows:

- a. Date. The NRC seal and address are at the top of the first page and are followed by the date on which the report cover letter is signed and the report issued.
- b. Enforcement Action. If the report contains findings assigned an enforcement action (EA) number, then the EA number should be placed in the upper left-hand corner above the principal addressee's name.
- c. Addressee. 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.
- d. Subject Line. The subject line of the letter shall state the plant name and inspection subject (e.g., "XXXXX Generating Station - NRC Integrated Inspection Report") followed by the report number. The information presented in the subject line must be in the following sequence: plant name, type of inspection, report number. Use the official plant name and docket number as described in Section [0612-14, 'Compiling an Inspection Report.'](#)

The words "NOTICE OF VIOLATION" ("EXERCISE OF ENFORCEMENT DISCRETION" or "NOTICE OF DEVIATION," etc.) must be included if an enforcement action accompanies the inspection report.

- e. Salutation. Ensure the salutation follows the subject line.
- f. Introductory Paragraphs. The first two paragraphs of the cover letter should give a brief introduction, including the type of report (e.g., license renewal report, integrated inspection report) and pertinent dates (i.e., date of final exit meeting with licensee, date NRC was informed of licensee readiness for supplemental inspections, date decision was made that a reactive inspection would be conducted in response to events).
- g. Body. The body of the letter shall discuss the most important topics first. The following identifies how different types of findings should be reflected in the cover letter to an inspection report.

IF:	THEN:
If there are no findings identified	Insert a separate paragraph stating:  "Based on the results of this inspection, no findings were identified."
If Green findings are identified	State the number of findings. Include the following statement:  "There were [the number] findings of very low safety significance (Green) identified in the report."  <u>Since security inspection reports are not publicly available, only security inspection report cover letters should contain a brief description of assigned cross cutting aspects.</u>
If Severity Level IV violations or violations associated with Green findings are being dispositioned as NCVs or in NOVs	Document in accordance with the guidance in Appendix B, Form 2 of the <a href="#">Enforcement Manual</a> .
If a finding has the potential to be greater than Green in significance	Briefly discuss the finding(s), in the order of significance if more than one finding. The cover letter should clearly state why the finding does not present an immediate safety concern, and (if appropriate) that licensee compensatory measures are in place while licensee long-term corrective measures are being implemented.
If a finding appears to be greater than Green and if an apparent violation AV is involved for which a Notice of Violation is being considered	Briefly discuss the finding(s), in the order of significance if more than one finding. The appropriate wording for the findings that are also violations of requirements can be found in the <a href="#">Enforcement Manual</a> .
If a violation appears to be greater than Severity Level IV	Briefly discuss the finding(s)/violation(s), in the order of significance if more than one finding. Discuss in accordance with the guidance in the <a href="#">Enforcement Manual</a> .

IF:	THEN:
If a violation was identified but was not associated with a performance deficiency.	Discuss in accordance with the guidance described in the <a href="#">Enforcement Policy</a> and <a href="#">Enforcement Manual</a> .

- h. Closing. The final paragraph consists of standard legal language that varies depending on whether enforcement action is involved. See the example cover letter in of [Exhibit 4, 'Sample Cover Letters.'](#) of this IMC.

The signature of the appropriate NRC official is followed by the docket number(s), license number(s), enclosures, and distribution list.

- i. Security Inspection Reports. The cover letters for security inspection reports will be similar in format to other inspection report cover letters, but will not include details or descriptions of any inspection findings. The cover letters shall state the number of Green findings identified and a brief description of cross-cutting aspects, if applicable. However, the letters will not state the number of greater than Green findings (if any were identified), only that findings with greater-than-green significance have been identified and a brief description of cross-cutting aspects, if applicable. See sample cover letter number 4 of [Exhibit 4, 'Sample Cover Letters.'](#) of this IMC for standard paragraphs to include in security report cover letters.

14.02 Cover Page. The report cover page gives a succinct summary of information about the inspection. It contains: the docket number(s), license number(s), report number, licensee name, facility name, facility location (city and state), dates of the inspection, names and titles of participating inspectors (and may include names of those inspectors who have achieved basic inspector certification but are not yet fully qualified), and name and title of the approving NRC manager. See [Exhibit 3, 'Sample Reactor Inspection Report.'](#) of this IMC for format. The inspection report number is to be identified in the following form as required by [IMC 0306, 'Information Technology Support for the Reactor Oversight Process:'](#)

Docket No. /Year [sequential number of the report in that year]  
(e.g., 05000410/2003001)

14.03 Table of Contents. If a report is considered complicated or of significant length, then develop a table of contents. If Report Details section is more than 20 pages long, a table of contents should be considered.

14.04 Summary of Findings. The summary should be an informative but concise overview of the significant inspection findings contained in the details of the report. It will also be used for entries to the ADAMS and the RPS Plant Issues Matrix (PIM).

- a. The first paragraph of the summary of findings section is used to describe the inspection report in ADAMS (title value field in ADAMS).

The paragraph must include the following, in order:

1. The inspection report number (See [IMC 0306, 'Information Technology Support for the Reactor Oversight Process.'](#) for format);
2. The dates of the inspection;
3. The name of the site; and
4. The titles of only the inspection procedures or attachments in which findings were identified (e.g., equipment alignment, fire protection, operability evaluations).

If no findings were identified, the general inspection area or title of inspection report should be listed (e.g., integrated report, or emergency preparedness report, or biennial problem identification and resolution report, or special inspection report).

For non-routine inspections, the same format should be followed to identify the report number, unit names, and dates of inspection. These are followed by the title of the inspection and a list of findings. (See [Appendix D, 'Guidance for Documenting Inspection Procedure 71152, Problem Identification and Resolution,'](#) of this IMC for examples.)

- b. Summary Paragraph. The summary paragraph follows the ADAMS template paragraph and describes who conducted the inspection (i.e., resident and/or specialist inspectors), the number of findings, and violations.

The summary also includes an explanation that the significance of most findings is indicated by their color (greater than Green, or Green, White, Yellow, Red); the significance was determined using [IMC 0609, 'Significance Determination Process'](#) (SDP); the cross-cutting aspect was determined using [IMC 0310, 'Components Within the Cross Cutting Areas.'](#) and that findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. This explanation is not included if no findings were identified.

- c. List of findings. Compile a list of findings by reviewing the details developed for each report section. Write a two paragraph summary for each issue that is designated a finding (FIN), violation (VIO), an apparent violation (AV), or non-cited violation (NCV). The text of the summaries must be consistent with the corresponding details in the inspection report.

Do not document the following in the summary of findings: licensee-identified NCVs, licensee-identified Green findings, minor violations, and unresolved items.

1. First Paragraph: Begin the summary for each finding with the significance (color or severity level). Use TBD for those violations where the significance or severity level has not yet been determined and for findings with a preliminary color greater than Green. Then, describe the finding including any enforcement action, the specific requirement violated, and identification

credit for the finding. Include a brief description of the immediate corrective actions completed to restore compliance, planned by the licensee, if applicable, and a statement that the violation has been placed in the licensee corrective action program. If the planned corrective action is still being evaluated, a sentence stating such is sufficient.

Second Paragraph: The second paragraph should briefly summarize the finding's significance from the analysis section. Briefly describe why the finding is greater than minor, provide effect on the cornerstone, and state why the finding is not greater than green (if applicable). If applicable, restate the cross-cutting area, the cross-cutting component, the cross-cutting aspects of the finding, and the alphanumeric identifier as described in the corresponding Analysis Section of the report. If no cross-cutting aspect was identified then make a statement to that effect. Each summary must end with a reference to the section of the report in which the finding is discussed.

2. Group the finding summaries by cornerstones in the order specified in [Exhibit 1, 'Standard Reactor Inspection Report Outline,'](#) of this IMC. Findings not associated with a cornerstone should be listed at the end under "Other Findings" (e.g., Enforcement).
3. If a Green or Severity Level IV licensee-identified finding resulted in a violation, include the following boilerplate paragraph as the last paragraph of the summary of findings:

"Violations of very low safety significance or severity level IV that were identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. These violations and corrective action tracking numbers are listed in Section 4OA7 of this report."

14.05 Plant Status. If appropriate, write a Summary of Plant Status section. If used, briefly describe pertinent operational events, such as any plant shutdowns or significant changes in power. This summary is not needed for specialist inspections since plant operating status may not be relevant to a safeguards or emergency preparedness inspection.

14.06 Report Details. Arrange the report details in accordance with the standard report outline shown in [Exhibit 1, 'Standard Reactor Inspection Report Outline,'](#) of this IMC. Each outline topic (inspectable area) does not have to be covered in each report. When an inspection is performed in a particular area, the resulting details are placed in the corresponding section of the report.

In those cases where a standard format is not readily applied, the most important subject should be identified first, followed by a discussion of major topics identified in descending order of significance.

Exceptions to the standard format include:

- Supplemental Inspection (SI) reports;
- Augmented Inspection Team (AIT) reports;
- Special Inspection Team (SIT) reports, and;
- Other cases where the specifically directed focus of the inspection does not easily fit into the standardized report outline (i.e., license renewal inspections).

Findings, violations, and unresolved items are documented under the inspectable area in which the issue was discovered. Additionally:

- If a finding is unrelated to a specific inspectable area, then document the finding in Section 4OA5 of the inspection report;
  - If a violation is not a performance deficiency, and does not involve willfulness, actual safety consequences, or impeding the regulatory process, then it is documented in Section 4OA5 of the inspection report;
  - Issues or findings that may be of some value as a potential future [IP 71152 Problem Identification and Resolution](#) (PI&R) inspection sample may be listed as a cross-reference in Section 4OA2 of the inspection report. These findings must already be documented elsewhere in the report;
  - If new information becomes available after the inspection report is issued, which results in a change to the cross-cutting aspect of a finding, document the change and the basis for the revision in section 4OA5, "Other Activities," in the integrated report that is open at the time of the revision. Also update the original PIM entry with the revised cross-cutting aspect;
  - Observations not directly related to a finding or unresolved item may be documented if allowed by [an appendix to this chapter](#) or by the specific [inspection procedure](#) or [temporary instruction](#); and
  - If documenting a Backfit where the licensee is not in compliance, then document in Section 4OA5 as a VIO.
- a. Format of Each Inspectable Area. Each inspectable area shall include an Inspection Scope and Findings sections as described below:
1. Inspection Scope. For each inspectable area, describe the inspection scope. Do not repeat any portion of the Scope in the Findings section. The scope should:
    - (a) Identify how the inspection was conducted (i.e., the methods of inspection.) Methods can include a walk-down, an in-office review,

observation of test from the control room, discussion with specific personnel, or participation in an exercise;

- (b) Identify what was inspected. Include sufficient detail on which and how many samples were completed. If more than six documents were reviewed, then list the items in an attachment and reference the attachment in the Scope section;
- (c) Identify the inspection objectives and the criteria that were used to determine whether the licensee is in compliance; and
- (d) Include inspection dates to clarify inspection scope context if it helps with understanding the scope. For example, inspection dates may be helpful when discussing event follow-up.

If a substantive portion of the inspection activity was conducted at a location other than the plant, (e.g., an in-office review), then identify where the inspection took place.

- 2. Findings. Document each finding in accordance with Section [0612-06, 'The Four-Part Format,'](#) and each URI in accordance with Section [0612-08 'Unresolved Items.'](#) Present the findings within each report section in order of importance. If no findings or only minor violations/findings that do not require documentation were identified within an inspectable area, then state 'No findings were identified' in the Findings section of the report.

b. Miscellaneous Guidance.

- 1. Graphics/visual aids - Use of graphics (drawings, diagrams, photographs, or photocopies) is permissible if their inclusion will simplify describing a complex condition that would otherwise require substantially more text. Including graphics may complicate report processing and result in excessive file sizes. **Graphics must adhere to SUNSI guidelines (See Section [13.04 'Treatment of Sensitive Unclassified Non-Safeguards Information \(SUNSI\) in Non-Security Related Reports.'](#))**

When photographs of plant areas or equipment or photocopies of technical or vendor manual pages are used, permission shall be obtained in writing from the licensee or vendor. An e-mail from the licensee or vendor is acceptable provided it is placed in ADAMS as an official record or attached to the inspection report. It is allowable to develop a simplified drawing or diagram, however, it must be submitted to the licensee or vendor to determine if it is considered proprietary. All graphics shall adhere to the following guidelines:

- 2. All graphics shall be in a jpeg format and sized (height, width, and resolution) so as not to significantly increase overall file size;

3. Keep each graphic to a reasonable size (e.g.: <1/2 page), or put in attachment;
  4. Centered on page and left/right indented from the text; and
  5. Each graphic shall have a unique identifier (Figure/Diagram/Photograph X) with a descriptive title (e.g.: Breaker Trip Latch Alignment).
- c. Tracking. As stated in [IMC 0306, 'Information Technology Support for the Reactor Oversight Process.'](#) all NRC-identified and self-revealing findings (FINs), violations (VIOs), and non-cited violations (NCVs), as well as apparent violations (AV) and unresolved items (URIs) must be assigned a sequential tracking number. A brief title for the finding will be listed after the assigned tracking number. This title will be entered into the PIM and should describe the performance deficiency that is the basis for the finding.
1. Assign type codes as follows:
    - (a) AV – A noncompliance with a regulatory requirement for which an enforcement decision has not been reached.
    - (b) FIN – A performance deficiency of more than minor significance *without* an attached (non -TE) violation. Findings underlying (but processed separately from) a TE violation will still be coded FIN. A FIN may be Green, White, Yellow, or Red, or, if the significance of the FIN has not been finalized, (TBD) shall be added after FIN.
    - (c) VIO – The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification. The Acronym 'VIO' is used in inspection reports and in RPS to reflect cited violations. A VIO may be associated with a finding or it may not. Similarly, a VIO may be associated with TE (see above) or with non-TE. VIO may also be used to document a Backfit item involving a failure to comply with a legally binding regulatory requirement.
    - (d) NCV – A non-recurring, typically, non-willful, Severity Level IV violation or a non-TE violation typically (but not necessarily) associated with a GREEN ROP FINDING that is not subject to formal enforcement action if the licensee places the violation in a CAP to address recurrence and restores compliance within a reasonable period of time. Provided applicable criteria in the [Enforcement Policy](#) and the [Enforcement Manual](#) are met, such issues are documented as violations, but are not cited in notices of violation, which normally require written responses from licensees.
    - (e) URI – An issue of concern about which more information is required to determine (a) if a performance deficiency exists, (b) if the performance

deficiency is more than minor or (c) if the issue of concern constitutes a violation. URI shall not be used while determining the significance of a finding or violation or while determining whether or not a violation warrants enforcement discretion. See [03.03, 'Apparent Violation \(AV\),'](#) and [03.45, 'To Be Determined \(TBD\),'](#) for discussion of type codes applicable to such scenarios.

14.07 Exit Meeting Summary. Write a brief summary of the exit meeting in Section 4OA6. This information will also be described in the first paragraph of the cover letter. The summary must identify the most senior licensee manager who attended the meeting and must include the following information:

- a. Absence of 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. See [IMC 0620, 'Inspection Documents and Records,'](#) for actions to take if the report includes proprietary material.

NOTE: 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.

- b. Subsequent Contacts or Changes in NRC Position. If the NRC's 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.
- c. 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.
- d. 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 (NEI Cover Letter), and ML003679799 (SECY 00-045 endorsing NEI 99-04 guidance).

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

14.08 Report Attachments. The attachments discussed below are included at the end of the inspection report if applicable to the inspection. The attachments may be combined into a single attachment entitled "Supplementary Information."

- a. List of Items Opened, Closed, Discussed, and Updated. The report shall include a quick reference list of items opened, closed, and updated, including the item type, the tracking number for the item, and the item title (used in PIM headers describing the item). Open items that were discussed (but not closed) should also be included in this list, along with a reference to the sections in the report in which the items are discussed. NCVs will normally be opened and closed in the initiating inspection report.
- b. Key Points of Contact. List, by name and title, those 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.
- c. List of Documents Reviewed. A list of the documents and records reviewed during an inspection must be publicly available. Therefore, include a listing of all the documents and records reviewed during the inspection that are not identified in the body of the report. "Reviewed" in this context means to examine critically or deliberately (see [IMC 0620, 'Inspection Documents and Records.'](#)). The list does not include records that were only superficially reviewed. Lists consisting of more than six documents reviewed should be removed from the body of the report and included as an attachment.

Documents and records reviewed for Security inspection reports will not be made publicly available.

The level of detail for listed documents must be sufficient to allow the NRC to retrieve the document from the licensee in the foreseeable future. Therefore, a unique identifier, which may include the tracking number, title, revision and/or date, must be provided for each document referenced.

If it is necessary to document review of an INPO document (i.e., an evaluation referring to the INPO document was an inspection sample or justification for a cross-cutting aspect), then state the reference number of the item reviewed (e.g., condition report or evaluation number) and provide general words for the title. For example, "Condition Report No. 235235 concerning industry information on pumps."

- d. List of Acronyms. Include a list of acronyms for any report whose details section exceeds 20 pages. For shorter reports in which a relatively small number of

acronyms have been used, the list is optional. In all cases, however, acronyms should be spelled out when first used in inspection report text.

## 0612-15 ISSUING INSPECTION REPORTS

### 15.01 Report Timeliness.

- a. Most inspection reports, including Special Inspections, should be issued no later than 45 calendar days after inspection completion.
- b. Timeliness goals should be accelerated as necessary for inspection reports covering potential escalated enforcement actions and as specified in [Management Directive 8.3, 'NRC Incident Investigation Program.'](#) for reactive inspections; (e.g., AITs, and IITs.)

NOTE: For independent inspection reports, the inspection completion is normally defined as the day of the exit meeting. For integrated inspection reports the inspection completion is normally defined as the last day covered by the inspection report.

- c. Whenever an inspection reveals greater-than-green findings (i.e., White or higher) or other significant or immediate public health and safety concern, an expedited inspection report that is limited in scope to the specific findings should be considered.

### 15.02 Release and Disclosure of Inspection Reports.

- a. General Public Disclosure and Exemptions. Except for report enclosures containing exempt information, all final inspection reports will be disclosed routinely to the public. [IMC 0620, 'Inspection Documents and Records.'](#) gives guidance on acquiring and controlling NRC records, including inspection-related documents. In general, safeguards information or related sensitive information should not be released except as specified by current agency policy. Any questions regarding this policy should be referred to the program office.
- b. Security Cornerstone Inspection Reports. Inspection reports for the security cornerstone will not be made publicly available. Security-related inspection reports will be sent to the respective State Liaison Officers and State Homeland Security Advisors, when they have been appointed, authorized, communicated a desire to receive the report, and have the resources to control the safeguards information. These reports will be controlled and marked as safeguards information (SGI) or official use only information (SUNSI) based on the level of information contained in them. The cover letters to the reports will be made publicly available.

The cover letters for security inspection reports will be similar in format to other inspection report cover letters (see Section [14.01, 'Cover Letter.'](#) paragraphs a through i), but will not include details or descriptions of any inspection findings. The cover letters shall state the number of Green findings identified and a brief

description of cross-cutting aspects, if applicable. The letters will not state the number of greater than Green findings (if any were identified), only that findings with greater-than-green significance have been identified and a brief description of cross-cutting aspects, if applicable. See sample cover letter number 4 of Exhibit 4 for standard paragraphs to include in security report cover letters.

The cover letters will be marked for the highest level of controlled information contained in the inspection report: official use only (SUNSI) or SGI. The marking requirements for safeguards information are in [Management Directive 12.6, 'NRC Sensitive Unclassified Information Security Program,'](#) and the requirements for marking security-related official use only documents are on the Web at: <http://www.internal.nrc.gov/sunsi/>, "Sensitive Unclassified Non-Safeguards Information (SUNSI)."

- c. Release of Investigation-Related Information. When an inspector accompanies an investigator on an investigation, the inspector must not release either the investigation report or his or her individual input to the investigation report. This information is exempt from disclosure by [10 CFR 9.17, 'Agency records exempt from public disclosure,'](#) and must not be circulated outside the NRC without specific approval of the Chairman (refer to OI Policy Statement 23).

The latest revisions of the following exhibits and appendices may be accessed from the NRC Public [Inspection Manual Chapters Web Page](#), located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/manual-chapter/index.html>.

The latest revisions of NRC Public [Inspection Procedures](#) are also available at the NRC Public [Inspection Procedures Web Page](#), located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/>

## EXHIBITS

- Exhibit 1: Standard Reactor Inspection Report Outline
- Exhibit 2: Inspection Report Documentation Matrix
- Exhibit 3: Sample Reactor Inspection Report
- Exhibit 4: Sample Cover Letters

## APPENDICES

- Appendix A: Acronyms Used in Inspection Manual Chapter 0612
- Appendix B: Issue Screening
- Appendix C: Documentation Guidance for Supplemental Inspections
- Appendix D: Documentation Guidance ['Identification and Resolution of Problems' Inspection Procedure \(IP 71152\)](#)
- Appendix E: Examples of Minor Issues
- Appendix F: Examples of Cross-Cutting Aspects

END

### ATTACHMENT 1 – Revision History for IMC 0612

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	02/10/2006	Revision history reviewed for the last four years.	NO	N/A	N/A
N/A	04/29/2002 CN 02-021	Initial issue of IMC-0612. Revised from IMC-0610* to address revised documentation requirements of the revised Reactor Oversight Process (ROP). This revision changed the manner in which findings are documented, deleted "no color" findings and the requirements to add licensee identified violations to the Plant Issue Matrix. Other Major changes involved re-formatting several sections for clarity; provided a sample inspection report (to be issued separately); re-structured and revised the thresholds for documentation (Appendix B); provided numerous new examples of minor violations in Appendix E; and provided a revised format for documenting findings.	NO	N/A	N/A
N/A	02/21/2003 CN 03-006	Made editorial changes to Appendix B (Issue Dispositioning Screening) to reflect title changes to standard ROP terminology.	NO	N/A	N/A
N/A	05/23/2003 CN 03-016	Exhibit 3 (Sample Reactor Inspection Report) revised to not require licensee identified NCV's be put in the PIM.	NO	N/A	N/A
N/A	06/24/2003 CN 03-021	IMC 0612 Power Reactor Inspection Reports main body, app appendices and exhibits were revised to achieve the following:  1. Consistency with IMC-0306 (Information Technology	NO	N/A	N/A

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
		<p>Support for the Reactor Oversight Process)</p> <p>2. Presented information in the order in which the activities will normally be performed in the process of developing and transmitting a reactor inspection report.</p> <p>3. Removed specific enforcement guidance to ensure consistency between the guidance in IMC-0612 and the Enforcement Policy and Enforcement Manual.</p> <p>4. Corrected incorrect or conflicting information.</p>			
N/A	01/14/2004 CN 04-001	Changed the inspection report timeliness to 45 calendar days for most inspection reports, including Special Inspections.	NO	N/A	N/A
N/A	09/30/2005 CN 05-028	Revised to clarify definitions for NRC-identified, self-revealing and licensee identified; to provide additional guidance on how to document cross-cutting issues; to improve guidance on LER closure; to update the new report timeliness requirement; and to reflect changes made to the document based on inspector feedback.	YES	N/A	N/A
N/A	06/22/2006 CN 06-015	Revised to provide additional guidance and requirements for documenting cross-cutting aspects of inspection findings and to provide guidance on inspection report approval requirements when resolution to unresolved items are based on discussions between inspector(s) and NRR technical staff(s).	YES	07/01/2006	ML061510135
N/A	11/02/2006	Revised definition of performance deficiency to bring the definition in alignment with the basis for performance	YES	09/06/2006	ML063000483

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
	CN 06-033	deficiency as described in ROP basis document, IMC-0308 Attachment 3, "Significance Determination Process Basis Document."			
N/A	09/20/2007 CN 07-029	IMC 0612 has been revised to add guidance on NRC use of INPO documents and on cover letters for security inspections. Also enhanced guidance on NCV's and SCAQ's.	No	N/A	ML071560246
N/A	<a href="#">12/04/2008</a> <a href="#">CN 08-034</a>	IMC 0612 has undergone a major re-write to incorporate numerous feedback forms and to add additional guidance for documenting inspection findings.	Yes	N/A	ML083220722
N/A	06/22/2006 CN 06-015	Enhancing the ROP to more fully address safety culture (SRM 04-0111)  Commitment tracking added to IMC-0612 in connection with relocating guidance specific to documenting cross-cutting attributes (CCAs) in inspection reports from IMC-0305 to IMC-0612	No (Not to relocate guidance Ref. C4 in IMC-0305)	07/01/2006	ML061510135
N/A	04/30/10 CN 10-013	Support changes to IMC 0612 App B to Enhance Integration of ROP with Traditional Enforcement (TE) and consolidation of screening guidance to App B  Recognize creation of IMC-0310 and relocate guidance specific to screening and documenting cross-cutting attributes (CCAs) from IMC-0305 to IMC-0612 App B and IMC-0612, respectively.  Address (in part) Feedback Forms 0612-1304, -1352, -1355, -1359, -1365, -1393, -1403, -1410, -1411, -1418,	No	N/A	ML091480470

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
		<p>-1419, -1420, -1437, and 1451 associated with documentation of apparent violations, screening analysis, self-imposed standards, SUNSI, cross-cutting finding attributes, findings involving enforcement discretion, screening of minor PDs, definition/glossary topics, establishing an appropriate level-of-guidance, inclusion of appropriate external references...</p> <p>Consolidate all screening guidance from Section 0612-05 'Screening Inspection Results,' into Appendix B screening guidance.</p> <p>Enhance document usefulness through enhanced use of hyperlinked content.</p>			