

## APPENDIX C

### GUIDANCE FOR SUPPLEMENTAL INSPECTION REPORTS

One of the objectives of Inspection Procedure (IP) 95001/95002 is to provide an assessment of the licensee's analysis and corrective actions associated with the issue(s) that prompted the supplemental inspection. The guidance contained in Inspection Manual Chapter (IMC) 0612 applies equally to the baseline and supplemental portions of the power reactor inspection program; however, given the nature of supplemental inspections, the type of documentation for supplemental inspections will be different than for baseline inspections. A supplemental inspection report will document the Nuclear Regulatory Commission's independent assessment of each inspection requirement and pertinent qualitative observations of the licensee's efforts to identify and address the root cause of the issue prompting the supplemental inspection. A separate inspection report will usually be generated for each supplemental inspection. All violations and findings must conform to the format guidance provided in IMC 0612. The independent review of the extent of condition and extent of cause called for in IP 95002 and performed using one or more procedure(s) chosen from Appendix B to IMC 2515 should be documented in addition to the other inspection requirements contained in IP 95002. Specific documentation requirements and report format for inspections conducted in accordance with IP 95003 will be provided by the team leader.

Listed below are some general principles that apply to documenting the results of the supplemental inspections performed in accordance with IP 95001/95002. These principles supplement the guidance contained elsewhere in IMC 0612.

1. The cover letter of the supplemental inspection report should conform to the guidance given for baseline inspection reports, but it should also contain a brief description of the inspection staff's overall conclusion regarding the effectiveness of the licensee's evaluation and corrective actions associated with the issue(s) that prompted the inspection. Refer to IMC 0612 Exhibit 4, "Cover Letter Templates" for additional guidance on cover letters.
2. A summary of issues for the supplemental inspection report should contain the inspection staff's overall assessment of the issue(s). The summary will include any specific findings associated with the licensee's evaluation and findings that emerged during the inspection.
3. The supplemental inspection report should contain a description of the inspection scope. This section should describe the purpose and objectives of the inspection and the issue(s) that prompted the inspection. This summary can be taken from a previous inspection report for an inspection-related issue, or it can be a summary of the details associated with a performance indicator that crossed a threshold. This section can also include a description of the licensee's preparation efforts for the inspection.

4. The supplemental inspection report should contain an assessment for each of the areas listed below, as applicable. For each area, state the inspection requirements prescribed in section 9500X-02, "Inspection Requirements," of IP 95001/95002. Provide a synopsis of the licensee's assessment related to the inspection requirement, the inspection staff's assessment of the licensee's evaluation, and any additional actions taken by the inspector to assess the validity of the licensee's evaluation.
  - a. Problem Identification
  - b. Root Cause, Extent-of-Condition, and Extent-of-Cause Evaluation
  - c. Corrective Actions
  - d. Independent Assessment of Extent-of-Condition and Extent-of-Cause (only for IP 95002 inspection reports)
  - e. Safety Culture Consideration (only for IP 95002 inspection reports)
  - f. Evaluation of IMC 0305 Criteria for Treatment of Old Design Issues
5. For all supplemental inspections conducted in accordance with IP 95001/95002, an assessment of the licensee's evaluation and corrective actions associated with the issue(s) should be documented. Negative conclusions regarding aspects of the licensee's evaluation and corrective actions should be supported by examples of performance deficiencies (i.e., observations or findings). Other conclusions should be supported by a brief statement describing their bases.
6. The supplemental inspection report should contain an exit meeting summary, a list of persons contacted, licensee documents reviewed during the inspection, and acronyms used in the inspection report.
7. The recommended signature authority for supplemental inspection reports is as follows:
  - a. For an inspection performed in accordance with IP 95001/95002 that resulted in no findings, green findings, or severity level IV violations, the responsible branch chief will sign out the report.
  - b. For an inspection performed in accordance with IP 95001/95002 that resulted in greater than green findings or greater than severity level IV violations, the responsible division director will sign out the report.
  - c. For an inspection performed in accordance with IP 95003, the regional administrator will sign out the report.
8. Inspectors should follow the guidance in IMC 0306 to record supplemental inspection results in the RPS Plant Issues Matrix (PIM).

| Exhibit 1 – Sample Supplemental Inspection Report for IP 95001 and IP 95002

Attachment 1 – Revision History for IMC 0612 Appendix C

Commitment Tracking Number	Issue Date & Accession Number	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	06/24/03 <a href="#">CN 03-021</a> <a href="#">ML031610693</a>	Initial Issue	No	N/A	
N/A	02/02/09 <a href="#">CN 09-004</a> <a href="#">ML083040427</a>	This appendix did not have a revision history table prior to this revision. This revision incorporates an example supplemental inspection report and updates the previous documentation guidance. This revision also closes ROP Feedback Forms 95001-849 and 0612C-1154.	No	N/A	<a href="#">ML083530785</a>
N/A	10/28/11 CN 11-024 ML092540495	Relocated cover letter guidance to IMC 0612 Exhibit 4 and sample inspection report to IMC 0612 Appendix C Exhibit 1.	No	N/A	ML111880173