

## FUEL CYCLE FACILITY SAFETY AND SAFEGUARDS INSPECTION REPORTS

DRAFT

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## 0616-01 PURPOSE

To define the content and format for reports of fuel cycle facility inspections.

## 0616-02 OBJECTIVES

02.01 To ensure inspection reports clearly communicate significant inspection results in a consistent manner to licensees, NRC staff, and, where applicable given the need to control security-related information, the public.

02.02 To ensure proper documentation of the results of screening of inspection results, using tools in IMC-RFCOP-SDP, to determine if issues warrant documentation in inspection reports.

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

02.04 To provide inspection results as input into the Fuel Cycle Facility Assessment Program (IMC-RFCOP-2604) of the Fuel Cycle Oversight Process (FCOP).

## 0616-03 DEFINITIONS

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

Apparent Violation (AV): A violation of regulatory requirements that is being considered for potential escalated enforcement action. Note that inspectors should not identify a finding as an apparent violation during the inspection, including in any exit meeting prior to the agency determining that the issue is being considered for potential escalated enforcement action.

Certificate Holder. An entity responsible for meeting certain NRC requirements defined in an NRC-issued Certificate of Compliance (COC) (e.g., 10 CFR Parts 71 or 72) or by a certificate issued under 10 CFR Part 76. Note that for the purposes of this Inspection Manual Chapter (IMC), the use of the term “licensee” includes that of certificate holder.

Closed Item: A matter previously reported as a noncompliance, an inspection finding, a licensee event report, or an unresolved item, that the inspector concludes has been satisfactorily addressed based on information obtained during the current inspection.

Escalated Enforcement Action: A notice of violation or civil penalty for any Severity Level I, II, or III violation; a notice of violation associated with an inspection finding that the significance determination process characterizes as having low to moderate, or greater safety or security significance (White, Yellow or Red finding); or any order based upon a violation.

Fuel Cycle Significance Determination Process (FCSDP): The process used to determine the safety or security significance of an inspection finding as described in IMC-RFCOP-SDP.

Finding (FIN): A performance deficiency of greater than minor significance. Findings may or may not be associated with regulatory requirements and, therefore, may or may not result in a violation.

Green Finding: A finding of very low safety or security significance.

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.

Integrated or Independent Inspection Report: A fuel cycle facility inspection report that documents the results of inspection(s) conducted by NRC inspectors within a specified period.

Issue of Concern: A well-defined observation or collection of observations that is of concern and may or may not involve a performance deficiency.

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

Minor Violation: A violation that is of such low significance that documentation in an NRC inspection report is not normally warranted (See screening criteria in Section XX of Attachment 2 of IMC-RFCOP-SDP). Although minor violations must be corrected, they are not usually described in inspection reports (see exceptions in Section 0616-11).

Non-Cited Violation (NCV): A method for dispositioning a Severity Level IV violation or a violation associated with a finding that is characterized as Green (very low safety or security significance). Provided applicable criteria in the Enforcement Policy are met, such findings are documented as violations, but are not cited in notices of violation, which normally require written responses from licensees.

Notice of Deviation (NOD): A licensee's failure to satisfy a written 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.

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

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.

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.

Performance Deficiency: An issue that is the result of a licensee (or certificate holder) 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. A performance deficiency can exist if a licensee fails to meet a self-imposed standard or a standard required by regulation. Issues which do not have a more than minor impact on safety or security are not to be pursued as inspection findings and are not included in the assessment of overall licensee performance.

Potential Violation: The term to be used in an exit meeting to characterize a finding that could be a violation, but has not undergone screening and an agency decision that the finding is a violation.

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.

Red Finding: A finding of high safety or security significance as determined by IMC-RFCOP-SDP, Fuel Cycle Significance Determination Process.

Self-Revealing: For the purpose of documentation in the FCOP, self-revealing findings are those findings that become self-evident and require no active and deliberate observation by the licensee or NRC inspectors to determine whether a change in process or equipment capability or function has occurred.

Unresolved Item (URI): An issue of concern about which more information is required to determine if a performance deficiency exists, if the performance deficiency is more than minor or 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 or clarification/interpretation of the existing guidance.

Violation (VIO): The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification.

Willfulness: An attitude toward noncompliance with requirements that ranges from careless disregard to a deliberate intent to violate or falsify.

White Finding: A finding of low to moderate safety or security significance as determined by IMC-RFCOP-SDP, Fuel Cycle Facility Significance Determination Process.

Yellow Finding: A finding of substantial safety or security significance as determined by IMC-RFCOP-SDP, Fuel Cycle Facility Significance Determination Process.

## 0616-04 RESPONSIBILITIES

04.01 General Responsibilities. Each inspection of a fuel cycle 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 fuel cycle facility 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 accurately reflects 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 NRC Enforcement Policy and the NRC Enforcement Manual.
- c. The management reviewer shall ensure that significance determinations made in the inspection report are in accordance with IMC-RFCOP-SDP, 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 Fuel Cycle Safety and Safeguards (FCSS). The FCSS Division in the Office of Nuclear Materials Safety and Safeguards (NMSS) 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.

## 0616-05 SCREENING INSPECTION RESULTS

The evaluation of inspection results begins with screening to determine if an issue of concern will be documented for consideration in the FCOP assessment process. The process for screening inspection results is described in section Attachment 1 of IMC-RFCOP-SDP. For issues with multiple examples, each example should be screened separately. Once an issue is screened, it will be documented in accordance with the guidance in subsequent sections.

## 0616-06 DOCUMENTING FINDINGS

This section provides instructions for documenting:

- NRC-identified or self-revealing findings that are Green or Severity Level IV; and
- Findings that are potentially greater than Green or greater than SL IV.

Guidance for documenting licensee-identified Green or Severity Level IV violations, violations without performance deficiencies, or minor violations is provided in Sections 0616-10, 0616-07, and 0616-11, respectively.

Additional guidance for documenting findings associated with Licensee Event Reports is provided in Section 0616-09.

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.

For findings that are potentially greater than green or are greater than green, use a four part format: an introduction, a description, an analysis, and an enforcement section for each of the findings. For green findings, use a two part format: a brief description and a brief analysis that refers to the section of the IMC-RFCOP-SDP that was used to conclude the issue was green. The sample inspection report presented in Exhibit 3 provides examples on how to apply the principles described in the sections below.

### 06.01 Introduction.

The introduction should provide a brief discussion of the greater than green or potentially greater than green finding. 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; the significance (color or severity level); identification credit; and the enforcement action and requirement violated, if applicable.

## 06.02 Description.

For green findings, the description of the finding should be limited to a brief one or two sentence summary that outlines the performance deficiency and includes reference to the inspection procedure (IP) used to identify the finding.

For a greater than green or potentially greater than green finding, list the IP used to identify the finding, describe the issue in sufficient detail (commensurate with the significance) for the reader to understand the issue, the evaluation of significance, and the enforcement conclusions. Include a description of any positive licensee performance that mitigated a potential problem and influenced the significance of the finding. New information shall not be introduced in the Analysis and Enforcement Sections. Findings with generic concerns should include specific details to identify the item of concern.

## 06.03 Analysis.

For green items, the analysis should be brief and limited to:

- What requirement was violated and how;
- a brief discussion of which appendix to IMC-RFCOP-SDP was used to determine that the item was green (and flowchart and path if applicable);
- assumptions used, if any;
- cornerstone affected;
- and a summary statement that because the issue is of very low safety or security significance and was placed in the licensee's corrective action program, there is no enforcement action using the wording below:

“Because this violation was of very low safety or security significance, was not repetitive or willful, and was entered into the licensee's corrective action program, this violation is being treated as an NCV, consistent with the NRC Enforcement Policy.”

For a greater than green or potentially greater than green finding, the level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusion and provide the information in Tables 1 and 2 of IMC-RFCOP-SDP, Attachment 1 or Table 1 of IMC-RFCOP-SDP, Appendix A and:

- a. The traditional enforcement criterion that was met, if applicable;
- b. For those items resulting from a phase 2 analysis, the phase 1 criteria that was satisfied that caused the finding to be assessed through Phase 2;
- c. The exposure time;
- d. Recovery credit;
- e. Why the finding does not present an immediate safety or security concern;
- f. Compensatory measures in place while licensee's long-term corrective measures are being implemented (if appropriate);

- g. 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
- h. A statement designating the significance of the finding as “To Be Determined (TBD).” State that the safety or security characterization is not yet finalized. Do not make direct statements regarding safety or security significance in the inspection report when the agency has not yet reached a conclusion.
- i. If a finding is dispositioned using enforcement, describe the logic for determining the severity level, including reference to the Enforcement Policy supplement, as applicable. See the sample report for examples.

#### 06.04 Enforcement.

This section is included in reports where an item is greater than green or potentially greater than green. Describe the applicable enforcement action for the finding. Findings found or reviewed during inspections that also include violations of regulatory requirements are documented in accordance with the NRC Enforcement Policy and the guidance provided below. The enforcement discussion and subsequent enforcement action must be consistent with the significance determination.

Do not speculate or reach conclusions about the intent behind a violation. Conclusions about the willfulness of a violation are agency decisions, and are normally not made until after the Office of Investigations (OI) has completed an investigation. A premature or inaccurate discussion of the willfulness of a violation in the inspection report could result in later conflicts based on additional input and review. Inspection reports that include potentially willful violations or containing material that may be related to an ongoing investigation must be reviewed by OI and the Office of Enforcement (OE) prior to issuance.

Document the enforcement aspect of the finding as described below:

- a. For a finding without a violation, the enforcement section shall include the following:
  - A statement similar to “Enforcement action does not apply because the performance deficiency did not involve a violation of a regulatory requirement”; or
  - If the finding is potentially greater than Green, “Because this finding does not involve a violation of regulatory requirements, but is potentially significant, it is identified as FIN [Tracking Number], Title.”
- b. For a finding with a violation, the enforcement section shall include the following (with exceptions noted below):
  - What requirement was violated;
  - When the violation occurred and how long it existed;

- Any actual or potential safety or security consequence (if not described earlier);
- Immediate corrective actions taken to restore compliance (if not described earlier);
- A reference to the licensee's corrective action document number;
- Specific enforcement actions; and
- Tracking number resulting from the violation. (e.g., NCV or NOV [Tracking Number], Title).

For a NOV, the specific enforcement action should be stated as

“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 NRC Enforcement Policy.”

In addition, see the Enforcement Manual for guidance on developing the notice and cover letter.

- c. For a finding with a 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.

## 0616-07 DOCUMENTING VIOLATIONS WITHOUT PERFORMANCE DEFICIENCIES

The Enforcement Policy states that the agency may exercise enforcement discretion. A violation that does not involve a performance deficiency may warrant discretion. As stated previously, this type of violation is not a finding and therefore, will not be documented using the four-part format.

If the violation is minor, no documentation is required. However, see the exceptions listed in Section 0616-11. If the violation to be discussed in the report is more than minor it must be dispositioned in an inspection report. 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:

The first part will describe the issue of concern, why there was no Performance Deficiency, and the safety or security significance. This part does not have to be lengthy, but contain sufficient detail including how significance was determined.

The second part will describe the requirement violated and include the following statement:

“However, because a performance deficiency was not 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 0616-13.01, Cover Letter, for additional guidance.

## 0616-08 DOCUMENTING 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. An URI cannot be used to obtain more information to determine the significance of a finding.

Such a concern may require additional information from the licensee or cannot be resolved without additional guidance or clarification/interpretation of the existing guidance (e.g. OI investigation in progress). A URI may also be opened when a Notice of Enforcement Discretion is granted to obtain additional information concerning the cause or need for the discretion. The action of documenting an unresolved item is a commitment of future resources, and 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 of the Four Part Format discussed in Section 0616-06. 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 0616-13.

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 NMSS or NSIR 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, use the four part format and follow the guidance of section 0616-06. 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 the appropriate section of the report depending on the technical issue.

## 0616-09 DOCUMENTING CLOSURE OF LERs AND CITED VIOLATIONS

09.01 Licensee Event Reports (LERs). Document reviews and closures of ILERs, including revisions to LERs, in the inspection report under Section OA3, "Event Followup." 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 OA3 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 Section 0616-05. 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 of significance were identified and no violation of NRC requirements occurred.
- b. Minor Violations. Use guidance in Section 0616-11.
- c. NRC-Identified or Self-Revealed Findings or Violations or Significant Licensee-Identified Violations and Findings: The four part format in section 06 must be followed if not previously documented.
- d. Licensee-identified NCVs: The safety or security significance and enforcement should be discussed per Section 0616-10 and not in the LER closeout section. A statement, such as "The enforcement aspects of this finding are discussed in Section XXXX," should be included in the LER closeout section.

09.02 Cited Violations. Document the closure of cited violations in Section XXXX. 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 normally one paragraph. Refer to IP 92702, Followup on Corrective Actions for Violations and Deviations, for further guidance.

## 0616-10 DOCUMENTING LICENSEE-IDENTIFIED VIOLATIONS

NRC policy requires that all documented non-compliances be dispositioned in accordance with the Enforcement Policy, regardless of who identified them. This does not mean that however that all non-compliances are to be required to be documented. Licensee-identified violations identified as part of a licensee's self-assessments or problem identification and resolution (PI&R) program, need not be documented in inspection reports.

- a. Self-Assessment or Problem Identification and Resolution (PI&R) Items. Under certain circumstances, issues that could be classified as green or result in a violation that would be classified as a non-cited violation (NCV) need not be documented. This is generally justified when the licensee identifies the violation and enters it into the licensee's corrective action program or established PI&R program. As a matter of Enforcement Policy, NRC enforcement seeks to encourage licensee problem identification and resolution efforts, and seeks to avoid the negative impact that may result from a redundant NRC emphasis on problems which the licensee's responsible action has already identified and corrected.

For example, suppose that while evaluating the licensee's quality assurance efforts in the fire protection area, an inspector reviews relevant audits and surveillances conducted over the previous year. The review reveals that the audits have been probing and thorough; the findings are well-developed and technically sound, and include six noncompliance issues, four of which might be classified as green or as SL IV.

In such a case, the inspector should follow up on the non-compliances and other audit findings to ensure that root causes have been appropriately assessed, that appropriate and comprehensive corrective actions have been taken, and that no new examples of the violations exist. This is provided, however, that no new problems are revealed by this follow-up, the inspector is normally not expected to cite the four violations individually, nor to report the details of those violations in the inspection report. Instead, the NRC report findings and conclusions should assess the adequacy of the licensee's quality assurance efforts, including a clear reference to the name, dates, and general subject matter of the audit or self-assessment.

Similarly, if a licensee operator or supervisor identifies a non-compliance during their normal duties or as part of a peer review and their issue is input to the PI&R system,

the process described above for non-compliances from audit findings should be followed.

**NOTE:** This guidance only applies to green or SL IV violations and non-willful violations. Even when identified through a licensee self-assessment, violations that could be categorized as potentially greater than green or greater than green or as SL III or above must be documented in the inspection report and given appropriate follow-up.

The inspector may document one or more of the issues found in a licensee self-assessment or formal corrective action program due to the technical significance or generic implications of the particular item. Technical details surrounding the violation may provide useful insight on equipment or system reliability, or on some aspect of human performance. In some cases, the inspector may decide to pursue additional follow-up of a particular licensee finding because of related licensee problems, previous NRC observations or violations involving the same or a related topic, or emerging agency or industry sensitivity in the given technical area.

If, for any of these reasons, the issuing office decides to discuss a particular licensee self-assessment finding or audit finding in the inspection report and that finding involves a violation, then the violation must be clearly dispositioned in the report. The violation may be dispositioned as a green finding/NCV unless any one of the circumstances listed in Section VI.A.8 of the NRC Enforcement Policy results in an NOV requiring a formal written response from the licensee. If the issue represents a minor violation, it should be documented as follows: “Although this issue should be corrected, it constitutes a violation of minor significance that is not subject to enforcement action in accordance with section IV of the Enforcement Policy.”

- b. Potentially greater than Green – If the finding is potentially greater than Green or greater than Severity Level IV then the finding must be screened and documented in accordance with Section 0616-05 and 06. The finding should be documented in the appropriate inspectable area and Summary of Findings. Although the finding or violation may be potentially greater than Green the documentation should state that the licensee identified the finding or violation.
- c. Violation – If the decision is to document a licensee-identified violation of very low safety or security significance or a Severity Level IV and the licensee has correctly evaluated the finding and has developed appropriate corrective actions, then briefly describe the violation in the report using the guidance in Sections 0616-06.02 and .03.

**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 NCV's.

- d. Not a violation - If the finding is not a violation, the finding is of very low safety or security significance, and the licensee has correctly evaluated the finding and has developed appropriate corrective actions, then the finding shall not be documented in the inspection report.
- e. 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 (i.e., caused the licensee to take additional corrective actions), then document the finding as a NRC-identified finding under the applicable cornerstone section of the report. Documentation should clearly emphasize that the licensee identified the finding but failed to recognize the problem identified by the inspector.

## 0616-11 DOCUMENTING MINOR ISSUES AND MINOR VIOLATIONS

Minor violations are not routinely documented in inspection reports. However, as stated in the Enforcement Policy/Manual, there may be exceptions. Documenting a minor violation may be warranted as part of closing out a Licensee Event Report, Unresolved Item, or follow-up to an allegation. Licensees are required to correct minor violations. If it is necessary to document a minor violation then only minimal discussion is required. The write-up should briefly describe the issue of concern, state that the issue has been addressed by the licensee and should 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 and is specified to be documented 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.

## 0616-12 OTHER GUIDANCE

12.01 Treatment of Third Party Reviews. Detailed NRC reviews of third party reviews with are not referenced in NRC inspection reports, tracking tools, or other agency documents unless the review is required by the NRC or an issue in a third party report is of such safety or security significance that no other reasonable alternative is acceptable. If a finding warrants tracking, it should be independently evaluated, documented, and tracked as an NRC finding in Section OA1.

Third party findings, recommendations, corrective actions, and operating experience which are placed in the licensee's corrective action program, can be considered appropriate for inspection.

12.02 Non-Routine Inspections. Document in Section OA4 activities related to Supplemental Inspections. Document in Section OA5 inspection results from IMC-RFCOP-2600, 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 0616-11 of this chapter.

12.03 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 OA5 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 is being documented 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.”

## 0616-13 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. The following additional guidance applies:

- Supplemental inspection results must also reflect the additional guidance provided in Appendix B to this IMC;
- IP-88152, “Identification and Resolution of Problems,” results have varying thresholds for documentation and must reflect the guidance provided in Appendix C 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.

13.01 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 the inspection report documentation matrix in Exhibit 2 for what should and should not be documented in the inspection report cover letter. Examples of inspection report cover letters can be found in Exhibit 4.

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 licensee and plant name and inspection subject (e.g., "XXXXX - 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 licensee and plant name and docket number.

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., integrated inspection report, supplemental inspection report) and pertinent dates (i.e., inspection period, 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 of significance were identified."

IF:	THEN:
If Green findings are identified	State the number of findings. Include the following statement:  "There were [the numbers] findings of very low safety or security significance (Green) identified in the report."
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 Enforcement Manual.
If a finding has the <u>potential</u> 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 or security 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 Section 2.13.4 of the Enforcement Manual.
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 Enforcement Manual.
If a violation was identified but was not associated with a performance deficiency.	Discuss in accordance with the guidance described in Section 2.13.6 of the Enforcement Manual/Policy.

- 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 Exhibit 4.

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. See sample cover letter number 3 of Exhibit 4 for standard paragraphs to include in security report cover letters.

13.02 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 for format.

The inspection report number is to be identified in the following form as required by IMC 0306:

Docket No./Year [sequential number of the report in that year]  
(e.g., 07000143/2010001)

13.03 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 30 pages long, a table of contents should be developed.

13.04 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 Agency-wide Documents Access and Management System (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:

- The inspection report number;
- The dates of the inspection;
- The name of the site; and
- The titles of only the inspection procedures in which findings were identified.

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, etc.).

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.

- 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-RFCOP-SDP and that findings for which the FCSDP 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). 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. Findings not associated with a cornerstone (e.g. willful violations) 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 or security 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 XXXX of this report.”

13.05 Plant Status. If appropriate, write a Summary of Plant Status section. If used, briefly describe pertinent operational events, such as any plant-wide maintenance outages, startup of new process equipment, etc. This summary is not needed for specialist inspections since plant status may not be relevant to a safeguards or emergency preparedness inspection.

13.06 Report Details. Arrange the report details in accordance with the standard report outline shown in Exhibit 1. 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 OA5 of the inspection report;
- If a violation is not a performance deficiency, and does not involve willfulness, actual safety or security consequences, or impeding the regulatory process, then it is documented in Section OA5 of the inspection report;
- Issues or findings that may be of some value as a potential future PI&R inspection sample may be listed as a cross-reference in Section OA1 of the inspection report. These findings must already be documented elsewhere in the report;

- 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 OA5 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, provide an inspection scope section. Do not repeat any portion of the Scope in the Findings section. The scope should:
  - 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;
  - Identify which procedure was used to inspect and how many samples were completed. If more than six documents were reviewed and contributed significantly to the bases for conclusions on safety or security adequacy, then list the items in an attachment and reference the attachment in the Scope section;

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 0616-06 and each URI in accordance with Section 0616-08. 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 of significance were identified” in the Findings section of the report.

b. Miscellaneous Guidance:

- 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. Also, these graphics must not contain classified or proprietary information or violate the Sensitive Unclassified Non-Safeguards Information (SUNSI) guidelines.

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:

- All graphics shall be in a jpeg format and sized (height, width, and resolution) so as not to significantly increase overall file size;
  - Keep each graphic to a reasonable size (e.g.: <1/2 page), or put in attachment;
  - Centered on page and left/right indented from the text; and
  - Each graphic shall have a unique identifier (Figure/Diagram/Photograph X) with a descriptive title (e.g.: Recovery Glove Box).
- c. Tracking: 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 - an inspection finding associated with a violation which is being reviewed because it may be potentially greater than Green or higher than Severity Level IV.
    - (b) FIN – an inspection finding which does not have enforcement. It may be Green or have a preliminary determination of greater than Green or have a final determination of White, Yellow, or Red).
    - (c) VIO – an inspection finding which resulted in a cited violation. NOTE: This may also be used when documenting a Backfit item since the licensee is in violation of requirements.
    - (d) NCV – an inspection finding which resulted in a non-cited Severity Level IV violation or a non-cited violation with Green significance.
    - (e) URI – an issue of concern in which more information is needed.

13.07 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. Proprietary Information: Most licensees consider much of their equipment and activities at the plant to be proprietary. At the exit meeting, the inspectors will determine whether the licensee considers any materials discussed in the exit meeting to be proprietary. See IMC 0620, "Inspection Documents and Records," for actions to take if the report includes proprietary material. Generally reports are written such that they do not contain proprietary information.
- 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: Document a licensee's exit meeting response. If the licensee disagrees with an inspection finding, this position should be documented in the exit meeting write-up.
- 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.

13.08 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, and which formed the basis of inspection conclusions regarding the adequacy of safety 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). 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.

The list of 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.

- d. List of Acronyms: Recommend including a list of acronyms for any report whose Details section exceeds 30 pages. Inspectors may include a list of acronyms whenever the inspectors conclude this would contribute to the clarity of the report. For reports in which a relatively small number of acronyms have been used, the list is optional. The list is also optional if more than 30 pages and the number of acronyms is relatively small. In all cases, however, acronyms should be spelled out when first used in inspection report text.

## 0616-14 ISSUING INSPECTION REPORTS

### 14.01 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 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 findings of significance (i.e., White or higher) or other significant or immediate public health and safety or security concern, an expedited inspection report that is limited in scope to the specific findings should be considered.

#### 14.02 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 gives guidance on acquiring and controlling NRC records, including inspection-related documents. In general, security-related and MC&A-related 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 security cornerstones will not be made publicly available. Inspection reports containing safeguards information 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 security-related or safeguards. Classified reports are not normally sent to State representatives. Prior to transmitting security reports to these organizations, confirm they are authorized to receive them. These reports will be controlled and marked appropriately 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, but will not include details or descriptions of any inspection findings. The cover letters shall state the number of Green findings identified. 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. See 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: such as official use only – proprietary information or classified or safeguards information.

- 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 9.5, and must not be circulated outside the NRC without specific approval of the Chairman (refer to OI Policy Statement 23).

END

EXHIBITS:

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

APPENDICES:

- Appendix A: Acronyms Used in Inspection Manual Chapter 0616
- Appendix B: Documentation Guidance for Supplemental Inspections
- Appendix C: Documentation Guidance “Identification and Resolution of Problems”  
Inspection Procedure (IP 88152)

DRAFT

ATTACHMENT 1

Revision History – IMC-RFCOP-0616

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	Xx/xx/10	Issued for use under the revised fuel cycle oversight process			ML