

NRC INSPECTION MANUAL

IRIB

MANUAL CHAPTER 0801

REACTOR OVERSIGHT PROCESS FEEDBACK PROGRAM

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0801-01 PURPOSE

This chapter describes the feedback process and feedback form used by the Office of Nuclear Reactor Regulation (NRR), Division of Inspection and Regional Support (DIRS), to document problems, concerns, or difficulties encountered in implementing the programs of the NRC's Reactor Oversight Process (ROP).

0801-02 POLICY

The NRC encourages the staff to identify issues that need program-level attention and to suggest changes to improve the effectiveness or implementation of the ROP. Although feedback is expected to come mostly from staff who implement the agency's oversight programs, any NRC employee may use the processes described below to make suggestions or recommendations regarding the ROP.

The ROP Feedback Form SharePoint site will be used to present up-to-date information on the status of feedback forms and timelines for revisions of ROP documents. To reach this site,

- a. Start at the NRC internal home page and under "EDO Staff Offices," click on "NRR."
- b. From NRR's left menu, click on "ROP Digital City."
- c. From the left menu under "SharePoint Sites," click on "ROP Feedback Forms."
- d. Use the menu on the left, to reach the following:
 1. Open Feedback Forms
 2. Document Timelines

All ROP documents for which feedback forms are submitted and the feedback approved will be updated annually, if possible. An up-to-date list of the documents undergoing revision is listed on the ROP Feedback Forms Document Timelines site. For each document, a cut-off date for the receipt of feedback forms is listed. Staff should consult the list to ensure that feedback forms are submitted in time to be considered for the next revision of the ROP document.

0801-03 APPLICABILITY

All NRC employees who have concerns or wish to provide feedback regarding the performance indicator, assessment, inspection, significance determination process, enforcement, and/or training programs shall follow the procedures outlined in section 06.01 of this inspection manual chapter (IMC).

The process described herein is used to collect and manage feedback on all ROP programs, including the Performance Indicator Program. The method for resolving interpretations of performance indicators is described in IMC 0608, "Performance Indicator Program."

0801-04 RESPONSIBILITIES

04.01 Director, Division of Inspection and Regional Support, (DIRS). Oversees the feedback program for the ROP.

04.02 Chief, Reactor Inspection Branch (IRIB), NRR. Administers the feedback program for the ROP. Ensures the final resolution of ROP feedback is approved by the cognizant technical branch chief or designated official. Approves inspector training, as appropriate.

04.03 Chiefs, Technical Branches, NRR or NSIR. Ensure that feedback on their programs is reviewed. Supervise the resolution of feedback on elements of the ROP within their branch's scope of responsibilities. **Authorize urgent feedback (see section 06.02, b. of this IMC)**. Perform final review on closure for all feedback. Recommend inspector training, as appropriate.

04.04 Supervisors of staff submitting feedback forms. Review feedback forms. **Add comments and authorization to the feedback forms and** forward to the ROP Feedback Coordinator via email (**ROP_Feedback** Resource).

04.05 ROP Feedback Coordinator. Receives **approved** feedback forms **from the originators' supervisors**. Assigns a lead reviewer, **enters the feedback form into the ROP feedback database, and forwards the feedback form to the lead reviewer**. **Maintains the ROP feedback database and produces monthly reports**. **Notifies the originator and originator's supervisor upon the receipt and resolution of feedback forms**. **Adds closed ROP Feedback Forms to the NRC's Agencywide Documents Access and Management System (ADAMS)**.

04.06 Lead Reviewer. Is typically the **technical** lead for the program document referenced on the form. **Reviews and resolves** feedback forms **or coordinates resolution with stakeholders**, **coordinates** changes to **the** program guidance document, and ensures **that** the final resolution of feedback is consistent with overall program guidance and the ROP framework. **Updates the ROPFF cut-off date on the ROP Feedback Forms Document Timelines site to communicate the date by which feedback forms need to be received to be considered for the upcoming revision of the document**. Recommends inspector training, as appropriate.

0801-05 DISCUSSION

NRC staff implementing NRC's programs (particularly inspectors) have first-hand information on licensee performance and directly observe the impact and results of

NRC programs and regulatory requirements. Therefore, it is important that the staff are given an opportunity to submit questions, concerns, and suggestions through their regional or **Headquarter's** supervision to the program offices.

Program offices need written feedback that explains the originator's suggestions or concerns to make effective changes to the ROP program. **The ROP Feedback Form (Exhibit 1) is used for this purpose.**

0801-06 STEPS IN THE ROP FEEDBACK FORM PROCESS

06.01 Originator submits feedback. Originators submitting feedback forms should address **only** one issue per ROP Feedback Form (Exhibit 1). The originator **shall complete the following sections** and then email the feedback form to the appropriate supervisor:

- a. Section A, **Number and Title:** Record the **number and title of the IP or IMC**, or the name of the performance indicator (PI). **Enter the issue date of the IP or IMC.**
- b. Section B, **Topic:** **Check the boxes of** all topic areas **for** which the feedback issue applies.
- c. Section C, **Summary of Issue:** Briefly summarize the concern or issue in one or two sentences (e.g., IMC 0612 provides conflicting and incomplete guidance on documentation of minor violations). **Identify** the specific IP or IMC section to which the feedback issue applies.
- d. Section D, **Comment(s)/Recommendation(s):** Briefly describe the concern or issue and the impact to the IP **or** IMC, and other related program documents (if known). Provide recommendation(s) and suggested resolution(s) for the issue. Include in the recommendation if staff resources to implement the recommended change will be impacted and how. **Check the box to indicate** whether training should be part of the solution. **If other documents are needed to communicate the request, check the applicable box in section D.**

Note: Only the relevant portions of other documents should be added to the end of a feedback form.

If describing a PI interpretation issue: 1) state the licensee's interpretation, 2) state the region's position, and 3) provide any recommendation(s), if appropriate.

- e. Section E, **Originator Submittal Information:** Complete all of the applicable information in this section.

Note: ROP feedback forms can also be initiated by the program office in cases when information received through other means (emails, agency reports, and, in some cases, from external stakeholders, etc.) affects the ROP.

06.02 Supervisor's Review (Section F). The originator's supervisor performs the following activities:

- a. Reviews the feedback form; and electronically enters comments, such as potential resolutions of the issue.
- b. For urgent feedback, the supervisor consults the ROP Feedback Forms Document Timelines site. If the ROPFF cut-off date has passed, the supervisor should contact the branch chief associated with the ROP document to discuss the feedback and its urgency. If both parties agree that the published timetable be interrupted or delayed, the supervisor should check the "urgent" box and state a justification for the urgent request.
- c. Completes the signature line of the feedback form.
- d. Emails the form to both the originator and the ROP_Feedback Resource.

06.03 Headquarters Assignment and Review of ROP Feedback.

a. The ROP Feedback Coordinator performs the following:

1. Enters the feedback form into the ROP feedback database.
2. Completes Section G: Lead Reviewer Assigned.
3. Transmits the updated feedback form to the lead reviewer, originator, and originator's supervisor within ten (10) business days of receipt to the ROP_Feedback Resource.

If the feedback involves enforcement, the ROP Feedback Coordinator also emails the feedback form to the DIRS Enforcement Coordinator.
4. Posts open feedback forms on the ROP Open Feedback Forms SharePoint site.
5. Maintains the ROP feedback database.
6. Regularly provides status reports to management and staff.
7. Posts status reports to the ROP Digital City Web page.
8. Upon receipt of approved feedback forms, completes Section I, Headquarters Approval and Completion Tracking, updates the database, and transmits updated feedback form to originator, originator's supervisor, and lead reviewer. A feedback form requiring a document change will be identified as "open, pending change notice" and continue to be tracked electronically.

- b. The lead reviewer performs the following actions:
1. Directly contacts the originator, early in the process, to fully understand the feedback.
 2. Determines whether or not to accept the feedback recommendation. At a minimum, the response should describe how the staff intends to address the issue if accepted, or provide an explanation why the recommendation was not accepted.
 3. For PI feedback, follows the process in IMC 0608, "Performance Indicator Program," for resolving performance indicator interpretation issues.
 4. Completes section H of the feedback form, documenting the decision to be taken.
 5. For urgent requests, recommends to the appropriate branch chief that the timeline for an ROP document be interrupted or delayed.

Forwards the feedback form to the appropriate branch chief for final approval
 6. Is responsible for maintaining the dates on the ROP Feedback Forms Document Timelines site to project an anticipated revision of the document.
 7. Incorporates the approved program document changes following the guidance of IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual."
- c. The cognizant branch chief reviews the feedback form, authorizes the feedback by signing the final approval signature line in Section I, and delivers the approved feedback form to the ROP Feedback Coordinator. The branch chief must authorize all urgent feedback requests that result in an interruption or delay of the ROP timeline published on the ROP Feedback Forms Document Timelines site.

06.04 Closing ROP Feedback Forms. IRIB closes an ROP feedback form upon receipt of approval from the cognizant branch chief when no change is necessary to the document in question. When a change is necessary in the ROP document, the ROP Feedback Coordinator continues to electronically track feedback issues until the inspection procedure (IP) or IMC is revised. Once the revised IP or IMC is issued, the ROP Feedback Coordinator will close the feedback form and add the closed feedback form to ADAMS. IMC 0608 describes the process for resolving performance indicator issues that are documented on ROP feedback forms.

END

Exhibit 1 – Reactor Oversight Process Feedback Form

REACTOR OVERSIGHT PROCESS FEEDBACK FORM

Feedback Form No.

(provided by IRIB)

INSTRUCTIONS

Each feedback form should address only one (1) issue.

Originator: Complete Sections A through E and email form to your supervisor.

Supervisor: Complete Section F; then email to the **ROP_Feedback Resource** and originator.

SECTION A: NUMBER AND TITLE

(Enter the number and title of the Inspection Procedure (IP), Inspection Manual Chapter (IMC), or Performance Indicator (PI). Enter the issue date of the IP or IMC.)

IP or IMC Number
and Title

Issue Date

Performance Indicator
Flag (i.e. MS01):

SECTION B: TOPIC (Select all topic areas which apply.):

Inspection	<input type="checkbox"/>	SDP	<input type="checkbox"/>	PIs	<input type="checkbox"/>	Training	<input type="checkbox"/>
Assessment	<input type="checkbox"/>	Enforcement	<input type="checkbox"/>	Other	<input type="checkbox"/>	X-Cut Issue	<input type="checkbox"/>

SECTION C: SUMMARY OF ISSUE

(Identify the specific IP or IMC section to which the feedback issue applies. Summarize the concern or issue in one or two sentences.)

IP or IMC Section:

Description:

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SECTION D: COMMENT(S)/RECOMMENDATION(S)

(Describe the issue and the impact to the IP or IMC and other related program documents (if known). If the description includes an excerpt from another document, check in the box below and attach to the end of the feedback form, only the portion of the document that pertains to the issue. Provide recommendation(s) and suggested resolution(s) for the issue. Include in the recommendation if resources to implement the change will be impacted and how. Indicate whether training would be part of the solution. If describing a PI interpretation issue: 1) state the licensee's interpretation, 2) state the region's position, and 3) provide any recommendation(s), if appropriate).

Comment(s):

Recommendation(s):

Do you think training is part of the solution? Yes No

Check here if additional documentation is added to communicate this request. Insert pages at the end of this feedback form. (Include only the relevant portions of a document.)

SECTION E: ORIGINATOR SUBMITTAL INFORMATION	
Name:	
Email:	
Phone No:	
Plant Name or Region:	
Date submitted to Supervisor:	
Supervisor's Name:	
Supervisor's Email:	

SECTION F: SUPERVISOR'S REVIEW

(Review sections A-E; add your remarks; and email to ROPFF Inbox. If request is urgent, state justification.)

Supervisor's Remarks (mandatory):

Supervisor's signature:

Date:

If this request is **URGENT** to require a change to the regularly scheduled revision of the ROP document (see ROP Feedback Forms Document Timelines site), check **Yes** here Yes

If **yes**, state reason for urgency

SECTION G: LEAD REVIEWER ASSIGNED

(The Lead Reviewer reviews the feedback and recommends to accept or not to accept the feedback recommendation.)

Assigned to:

Branch:

Phone No:

(Lead Reviewer)

Date Lead Reviewer Received Feedback Form:

Date Feedback Coordinator Acknowledged Receipt to Originator:

SECTION H: LEAD REVIEWER'S RESPONSE:

Change Notice Recommended: Yes No Training Recommended: Yes No

SECTION I: HEADQUARTERS APPROVAL AND COMPLETION TRACKING

(The HQ Branch Chief approves the final resolution of feedback comments. The ROP feedback form is closed if the resolution does not affect the program document, or after the comments or suggestions are incorporated into a program document. The feedback form will remain open, pending change notice, and tracked until the revised document is issued).

Lead Reviewer: _____ Date: _____

Final Branch Approval: _____ Date: _____

(HQ Branch Chief)

Date Feedback Form w/ Change Notice Updated in Database:

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Date Feedback Coordinator Updated Originator of Feedback Status:

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Date Revised Document Issued:

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Date Feedback Form Closed in Database:

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END

ATTACHMENT 1 - Revision History - IMC0801

Commitment Tracking Number	Issue Date	Description of Change	Training Required	Training Completion Date	Comment Resolution Accession Number
N/A	02/15/06	Revision history reviewed for the last four years	None	N/A	N/A
N/A	03/05/02 CN 02-007	Revised to reflect significant changes in the agency's oversight process and associated programs that have occurred since its last issuance on 01/01/83. This revision captures the feedback process associated with implementing the Reactor Oversight Process. It also describes in detail the feedback process and the role of those individuals with responsibility for reviewing and closing out feedback issues. This IMC includes an attachment that will be used to document feedback concerns.	None	N/A	N/A
N/A	01/27/05 CN 05-004	Revised so IIPB receives copies of all Feedback Forms concurrently with regional management via PIPBCAL. The feedback form (Exhibit 1) was revised to reflect this change and enhance the documentation and submission of issues and concerns. Enhancements were also made to improve the tracking of the resolved feedback forms until the revised document is issued.	None	N/A	N/A
N/A	03/13/06 CN 06-006	Revision updates position titles as per the NRR reorganization and incorporates assigning a high, medium, or low priority to the Feedback issue. Completion of priority are to be as follows: A high priority will be completed immediately, a medium priority will be completed within 90 days, and low priority within 180 days.	None	N/A	N/A

N/A	10/19/06 CN 06-028	Revision introduces use of the NRR Work Planning Center to assign TAC number and assign task to reviewer using the Work Planning and Characterization Form.	None	N/A	N/A
N/A	07/01/08 CN 08-019	Revised to more efficiently use TAC numbers for management of the feedback process and to comply with the formatting requirements of IMC 0040.	None	N/A	N/A
N/A	07/06/10 CN 10-015	Publish timelines on SharePoint to communicate tentative schedule for annual revision of documents associated with ROP feedback forms. The feedback form is revised to facilitate editing and adding attachments. Policy is changed to require supervisor approval before feedback form is transmitted to IRIB.	None	N/A	ML101810505