

# **NRC INSPECTION MANUAL**

IPAB

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MANUAL CHAPTER 0306

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INFORMATION TECHNOLOGY SUPPORT  
FOR THE REACTOR OVERSIGHT PROCESS

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## 0306-01 PURPOSE

01.01 The NRC uses the Reactor Program System (RPS) and the Reactor Oversight Process (ROP) Webpage to support ROP implementation.

- a. ROP-related data from RPS and other NRC information systems are used for:
  1. Assisting in official agency record production;
  2. Developing the ROP Webpage;
  3. Providing inputs to NRC management decisions; and
  4. Answering questions that the NRC receives from Congress, the Commission, State officials, interveners, and other stakeholders.
- b. This manual chapter discusses the following specific areas:
  1. Inspection Procedure Planning and Frequencies;
  2. Inspection Procedure Status and Sample Sizes;
  3. Charging Time for ROP Activities;
  4. Inspection Report and Item Numbering;
  5. Entering and Updating Inspection findings in the Plant Issues Matrix (PIM); and
  6. ROP Web Posting Process and Schedule.
- c. This manual only provides guidelines for the use of RPS to support ROP implementation, specifically the assessment and inspection activities.
- d. This manual does not provide step-by-step instructions. For detailed information on entering and updating RPS data, understanding the computer screen layouts, and creating and printing reports, visit the RPS Help Services Webpage at:

<http://nrr10.nrc.gov/nrr-office/rps/index.cfm>

On the RPS Webpage, users can access the RPS Dynamic Webpage and user guides.

## 0306-02 OBJECTIVES

02.01 To establish the policy and processes for entering and maintaining data in RPS and other NRC information systems used to support the ROP.

02.02 To help users of RPS and other NRC information systems, as well as NRC management, to understand and use ROP-related information.

02.03 To ensure consistency in the format and content of ROP-related data entered into RPS and other NRC information systems.

02.04 To ensure that the ROP-related data entered into RPS are complete, accurate, and timely for plant assessment and ROP self-assessment.

02.05 To ensure control and access to RPS by program office and regional office users.

### 0306-03 DEFINITIONS

The terms used in this manual chapter are consistent with the definitions provided in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," and IMC 0612, "Power Reactor Inspection Reports."

03.01 Agencywide Documents Access and Management System (ADAMS). The document management system that the NRC uses to maintain and disseminate official records.

03.02 Direct Inspection Effort (DIE). Time spent conducting an inspection procedure which relate to the Inspection Program Elements (i.e., baseline, supplemental, etc).

03.03 Event Date. The Event Date has the same definition as "Start Date of Findings in the Assessment Program," as described in IMC 0305, "Operating Reactor Assessment Program," Section 11-01 step b. The Event Date for Licensee Event Reports (LERs) is the actual Event Date described in the LER and not the LER issue date. The Event Date is used to assess timeliness goals.

03.04 Inspection Planning Cycle (IPC). The 12-month period from January 1 through December 31 of each year during which inspections are planned and plant performance is assessed.

03.05 Non-Direct Inspection Effort. Time spent supporting an inspection procedure (i.e., preparation, documentation, travel, SDP, etc).

03.06 Plant Issues Matrix (PIM). A consolidated listing of individual plant issues (i.e., inspection findings) related to plant performance as identified in issued inspection reports.

03.07 Reactor Program System (RPS). A collection of databases that provides an integrated methodology for planning, scheduling, conducting, reporting, and analyzing the reactor inspection functions and activities performed by the NRC regions and headquarters.

03.08 Sent date. The date in which an inspection report was signed. The sent date should always be populated in RPS after validating the PIM entries for accuracy. The

RPS treats an inspection item as finalized once the “Sent Date” is entered.

## 0306-04 RESPONSIBILITIES AND AUTHORITIES

### 04.01 Program Offices.

- a. Ensure that RPS implementation is consistent with related NRC policies, programs, and guidance, and other NRC information systems.
- b. Resolve RPS implementation problems, prioritize system enhancements, and update and issue implementation guidance.
- c. Verify the accuracy and timeliness of the data maintained in RPS and on the ROP **Webpage** in accordance with established schedules.

Control access to RPS by program office users. **Remove RPS access for staff who no longer need access to RPS modules and add access for new authorized users. Periodically conduct a review of authorized users for each RPS module.**

- d. Ensure the timely and accurate recording of time for all program office activities to support the ROP.
- e. Ensure the timely and accurate transfer of inspection reports, assessment letters, and inspection plans from ADAMS to the Web server to support the posting of this information to the ROP **Webpage**.
- f. **The NRR Reactor Inspection Branch (IRIB), Division of Inspection and Regional Support (DIRS):**
  1. **Maintains the inspection manual and procedures in accordance with IMC 0040, “Preparing, Revising, and Issuing Documents for the NRC Inspection Manual;” and**
  2. **Updates the data in the RPS Inspection Procedure Authority System (IPAS) module to ensure the inspection procedure hours and sample size are correct.**

### 04.02 Regional Offices and the Office of Nuclear Security and Incident Response (NSIR).

- a. Ensure the timely and accurate entry of RPS data for all regional or NSIR activities including, but not limited to, inspection report **ML numbers** from ADAMS, the inspection plans and the PIM.
- b. Ensure effective management of open items tracked in RPS in accordance with regional policies, procedures, and practices.

- c. Ensure complete and accurate entry of enforcement-related open items, including notices of violation, non-cited violations, notices of deviation, and escalated enforcement items.
- d. Control access to RPS by regional office users. **Remove RPS access for staff who no longer need access to RPS modules and add access for new authorized users. Periodically conduct a** review of authorized users for each RPS module.
- e. Ensure the timely and accurate recording of time for all regional activities to support the ROP.
- f. Ensure the timely and accurate entry of inspection reports, assessment letters, and inspection plans in ADAMS to support the posting of this information to the ROP **Webpage.**
- g. Verify the accuracy and timeliness of the data maintained in RPS and on the ROP **Webpage.**

04.03 All RPS Users. Ensure that the following security considerations are understood and adhered to:

- a. Access to RPS modules (i.e., IP, IR, etc.) is controlled via the RPS Security Access System (SAM) module to ensure that entry and update capabilities are restricted to authorized personnel only. The SAM module is maintained by designated Office of Nuclear Reactor Regulation (NRR), **NSIR, and** regional representatives. These representatives have the capability to allow or restrict access to each RPS module by any individual member of the NRC staff.
- b. RPS may contain pre-decisional information, so system confidentiality is necessary to prevent inappropriate disclosure of this type of information. Provisions for controlling access to information found in the RPS database are specified in the Privacy Act of 1974, 5 USC 552a, and in the NRC's regulations specified in 10 CFR Part 9.
- c. To the extent possible, and unless directed to by other program guidance, proprietary data, security information, and other sensitive unclassified information should be excluded from both the RPS database and the ROP **Webpage.** Safeguards information **and references** to an allegation or allegor **shall not be entered into RPS.**

0306-05 **GENERAL REQUIREMENTS**

05.01 Inspection Procedure Planning and Frequencies.

- a. The regions **and NSIR** use the RPS Inspection Planning (IP) module to plan and schedule inspections based on an annual IPC.
  - 1. **Annual** IPCs begin on January **1st** and end on December **31.**
  - 2. **Semi-annual** frequencies have two 6-month periods per IPC:

- (1) January 1 to June 30, and
  - (2) July 1 to December 31
3. Quarterly frequencies have four 3-month periods per IPC:
- (1) Q1: January 1 to March 31,
  - (2) Q2: April 1 to June 30,
  - (3) Q3: July 1 to September 30, and
  - (4) Q4: October 1 to December 31.
- b. The regions plan inspections by scheduling inspection procedures that are listed in the RPS/ IPAS module.
1. The inspection procedure numbers listed in the RPS/IPAS are identical to actual inspection procedure numbers.
  2. Certain baseline inspection procedures that are attachments to IP 71111, “Reactor Safety—Initiating Events, Mitigating Systems, Barrier Integrity,” have multiple inspection frequencies (e.g., annually and quarterly) and corresponding sample size requirements. There is an IPAS inspection procedure number for each inspection procedure frequency. A list of codes used in RPS/IPAS for IP 71111 attachments is located on the RPS “How do I” Webpage at:  
  
<http://nrr10.nrc.gov/nrr-office/rps/how-do-i/baselineinspection.pdf>
- c. The following modules can be used to review and produce inspection plans for any plant at any given period of time.
1. RPS/REPORTS/IP 22, “Inspection/Activity Plan.” This is for the planned inspection activities excluding security. The inspection plan produced by this module is attached to the annual assessment and mid-cycle letters, in accordance with IMC 0305, to provide a schedule of NRC inspections at a given site for approximately the next 15 months. All letters and attached inspection plans are posted on the ROP Webpage.
  2. RPS/REPORTS/IP 24, “Security Activity Plan.” This is for the planned security inspection activities. The inspection plan produced by this module will be attached to the security annual assessment and mid-cycle letters, in accordance with IMC 0320, “Operating Reactor Security Oversight Program,” to provide the licensee a schedule of NRC security inspections over the next 15 months. These plans will not be posted on the public ROP Webpage, nor made public by any other means.

## 05.02 Inspection Procedure Status and Sample Sizes.

- a. The information on completion status and completed samples entered in RPS is used to:
  1. Track baseline completion for each reactor site, and
  2. Develop the monthly and annual completion status of the overall baseline inspection program for the ROP.
- b. The completed sample size and procedure completion status should be updated in RPS as soon as practical after completion of the inspection, but no later than 14 days after the inspection report is issued. This ensures accurate and timely reporting and that proper credit is given.

To preserve the integrity of reports generated after the end of the year, the RPS does not allow changing any "Complete" status to "Incomplete" or "N/A" after 60 days following the end-of-cycle.

- c. Completed sample sizes are entered in the RPS/Item Reporting (IR) module.
  1. Step-by-step guidance for entering sample sizes is available through the RPS "How do I" **Webpage** at:  
  
<http://nrr10.nrc.gov/rps/how-do-i/ir-adding-samples.htm>
  2. Refer to each inspection procedure for sampling requirements. A summary of the minimum required sample sizes and frequency for each baseline inspection procedure is available on the Dynamic Webpage, ROP, "List of ROP Procedures," at:  
  
<http://nrr10.nrc.gov/nrr-office/rps/dyn/list-of-rop-proc.cfm>
  3. Enter the number of samples actually inspected during the current inspection as the **sample size**. RPS will calculate the cumulative total.
  4. Sample sizes are limited to whole numbers.
  5. The sample sizes are entered in RPS by site. For a site with multiple units, it is the user's responsibility to track and analyze samples for each unit.
- d. The completion status of the procedure is updated in the RPS/Inspection Planning (IP **Issue Date: 11/17/11**) module.
  1. Step-by-step guidance for entering the completion status is available through the RPS "How do I" **Webpage** at:  
  
<http://nrr10.nrc.gov/rps/how-do-i/ip-sample-status.htm>
  2. The procedure completion status codes reported in RPS/IP are defined as



follows:

- (1) Incomplete. All required items identified in the procedure have not been completed. The minimum number of required samples, as defined in the procedure, has not been inspected.
- (2) Complete. All **required** items identified in the procedure are completed, including inspection of the minimum number of required annual **sub-samples**.
- (3) Complete - by Reference. **A specific comment must accompany this selection explaining the reason. Two ways for this status to be valid are:**
  - (a) All requirements of the procedure are met by work done in some other procedure(s) or at other units **on the same site**. The inspector will reference the other inspection(s) as the basis for demonstrating that all procedure requirements are completed. For planning and reporting purposes, the procedure is considered **completed**.
  - (b) For **procedures that have the sample size** determined by the performance of the plant over previous years, the minimum sample may vary to less or more than the required sample in RPS/IPAS. **Since RPS can only assign one sample size for the same inspection procedure, plants with less required sample size than the assigned would use this code.**
- (4) Complete - full sample not available. **A specific comment must accompany this selection explaining the reason that the** minimum sample size was not available for inspection during the inspection cycle. **Some procedures (i.e., IP 7111108) define a sample as** performance of multiple steps or inspection of specific activities. In these cases, all steps must be performed **or** all activities must be inspected for the sample to be considered complete.

**However, if those steps couldn't be completed due to unavailability, the procedure can be declared "complete - full sample not available."**
- (5) Complete - opportunity to apply procedure not available. **A specific comment must accompany this selection explaining the reason that** the opportunity to apply the procedure was not available during the inspection cycle. **For example, the licensee did not conduct an activity covered by the procedure.**
- (6) Complete – in previous year(s). **Only biennial and triennial procedures for which all samples have been inspected in the**

previous year(s) within the same biennial or triennial period can have this status.

(7) Not Applicable (N/A).

(a) Some procedures are site specific (i.e., TI for one site). Therefore, sites that are not subject to the procedure will use this code.

(b) For biennial and triennial procedure that are not scheduled during the current IPC and was not completed in a previous year within the same period. Only biennial and triennial procedures which were not scheduled to be completed during the current IPC can be "N/A." Procedures that have a completion status of "N/A" are not included in the calculation of program completion.

3. All baseline inspection procedures that have a quarterly or semi-annual frequency will have a completion status of "Incomplete" until:

(1) the cumulative minimum sample size for all inspection frequencies in the year has been reached for the procedure in the RPS/IR, or

(2) It is declared complete per step 6.

4. All baseline inspection procedures that have an annual frequency:

(1) At the beginning of the inspection cycle, each procedure is assigned a completion status of "Incomplete" and a completed sample size of "0."

(2) The completion status of the procedure remains "Incomplete" until:

(a) the cumulative minimum sample size has been reached for the procedure in the RPS/IR, or

(b) it is declared complete per step 6.

5. All baseline inspection procedures that have a biennial or triennial frequency:

(1) The status of these procedures are "N/A" if

(a) They are not required to be completed during the current inspection cycle, and

(b) They were not completed in a previous year within the triennial or biennial period.

- (2) If they are required to be completed during the current inspection cycle, the completion status remains “Incomplete” until:
  - (a) The required minimum sample size is reached for the procedure in the RPS/IR, or
  - (b) It is declared “Complete” per step 6.
- (3) If the procedure was completed in the previous year(s), choose the “Completed in previous year(s)” as the completion status.
  - (a) Example 1. The status of a triennial procedure completed in the second year of the triennial period would be “N/A” for the first year, “Complete” for the second year, and “Complete - in previous year(s)” for the third year.
  - (b) Example 2. The status of a biennial procedure completed in the first year of the biennial period would be reported as “Complete” in the first year, and “Complete - in previous year(s)” for the second year.

6. A procedure can also be declared “Complete” with less than the minimum or zero sample size completed by the branch chief (or designee) in the following cases:

- (1) If all requirements of the procedure are met by work done in other procedure(s) or at related units, the completion status is designated “Complete by Reference.”
- (2) Several baseline inspection procedures that are implemented “as required.” The completion status is “Complete” when the minimum sample size has been inspected. However, if at the end of the annual inspection cycle, the minimum sample size was not available to inspect, the procedure status is designated “Complete – full sample not available.”
- (3) If the opportunity to apply the procedure was not available during the inspection cycle the procedure status is designated “Complete - opportunity to apply procedure not available.”

For cases (1) – (3) above, the actual sample size (“0” if no sample) that was inspected is to be reported in RPS. Once the procedure is declared “Complete,” the RPS IR Report 8A will show the inspection as “Complete” for program completion purposes, regardless of the actual sample size.

7. The following three modules can be used to view completion status:

- (1) RPS/REPORTS/IR/Power Reactors/ROP Items 8 shows the completion status of all baseline procedures by region or by site.

- (2) RPS/IR/ REPORTS/IR/Power Reactors/ROP Items 9 provides a summary of the number of completed samples for all ROP inspection cycles, by site, for all baseline procedures. This summary provides a ready determination of completion for those procedures that have biennial and triennial frequencies.
- (3) RPS/IR/ REPORTS/IR/Power Reactors/ROP Items 7 provides an option to show reports based on ROP completion status.

8. The following examples illustrate how to determine the completion status and sample size.

- (1) Example 1. A baseline IP with a quarterly frequency requires reviewing three samples (total of 12 samples annually). The inspectors reviewed only one sample in the first quarter. The branch chief (or designee) entered a completed sample size of “1” and did not change the completion status.

During the second quarter, the resident inspectors reviewed three additional samples. The branch chief (or designee) entered the completed sample size of “3” and did not change the completion status.

When the cumulative completed sample size reached “12” in the RPS/IP, the branch chief (or designee) changed the completion status to “Complete.”

- (2) Example 2. The resident inspectors performed a baseline inspection procedure that required reviewing seven samples. Only five samples were available during the inspection cycle, but the intent of the inspection was met to the greatest extent practical.

At the end of the inspection cycle, or when it was determined that additional samples will not be available during the inspection cycle, the branch chief (or designee) entered “Complete - The minimum sample size was not available for inspection during the inspection cycle” as the status with a sample size of “5.”

- (3) Example 3. A baseline inspection procedure that is to be completed “as conditions require” was not performed during the annual inspection cycle. Since there were no opportunities to perform the inspection by the end of the annual cycle, the branch chief entered “Complete - The opportunity to apply the procedure was not available during the inspection cycle” as the status with a sample size of “0.”

### 05.03 Inspection Report and Item Numbering.

#### a. Inspection Report Numbering.

1. Every inspection report, preliminary or final significance determination letter, traditional enforcement letter, Notice of Violation letter, end-of-cycle assessment letter, mid-cycle assessment letter, or assessment follow-up letter for a given unit is uniquely numbered in the RPS Inspection Report Tracking System (IRTS). Each report or letter is classified by type using the drop down menu.

2. The numbering format for an inspection report is:

05000###/YYYY\*\*\*

Where

### is the docket number, YYYY is the year, and \*\*\* is the sequential report number.

- (1) The sequential report numbers (\*\*\*) for all the letters or reports are numbered sequentially.
- (2) Verify the correct IPC is associated with the report when it is generated.
- (3) Listed below is the numbering convention used for most reports. Reports that end in 001 to 006, 401, 402, and 501 are reserved for assessment and integrated inspection reports. The rest numbering is for information only and not a required guidance:

YYYY001	Annual Assessment
YYYY002	1st Quarter Integrated Report
YYYY003	2nd Quarter Integrated Report
YYYY004	3rd Quarter Integrated Report
YYYY005	4th Quarter Integrated Report
YYYY006	Mid-Cycle Assessment
YYYY007 – 099	Inspection reports
YYYY2**	Headquarters
YYYY3**	Operator Licensing
YYYY401	Security Annual Assessment
YYYY402	Security Mid Cycle Assessment
YYYY403-499	Security inspection reports
YYYY501	Emergency Preparedness Annual Inspection Report and other related activities documented in Integrated Report
YYYY502-599	Emergency Preparedness inspection reports
YYYY6**	Part 50 Construction

3. The report number shall be associated with the given item in RPS/IR.

b. Inspection Item Numbering.

1. An item number is required for each item identified in the inspection report, including each of the five type codes: violation (VIO), non-cited violation (NCV), apparent violation (AV), finding (FIN), unresolved item (URI), and traditional enforcement without an associate finding (TE).

2. For all licensed facilities, the numbering format for an inspection item is:

<type> 05000###/YYYY\*\*\*-\$\$

Where

<type> is the finding type code (VIO, NCV, AV, FIN, and URI), ### is the docket number, YYYY is the inspection year, \*\*\* is the sequential report number, and \$\$ is the item number.

Examples of inspection report item numbers are:

URI 05000346/2012004-01,  
FIN 05000285/2012003-02,  
VIO 05000443/2012301-03.

3. An item number is unique for each distinct inspection finding.

(1) The first item identified in the inspection report has "01" as the item number (\$\$), and each subsequent item is numbered in sequential order, regardless of type.

(2) The item number is assigned in sequential order at the site level, not at the unit level.

(3) If an item applies to multiple units at the same site, the item number will be the same for all applicable units. In this case, the item number will be the next sequential number of highest item number at the site level. The docket number and the associated inspection report number distinguish the unit to which the item applies.

The following examples illustrate proper item numbering for single and dual-unit sites:

Item Numbering for Single-Unit Site				
Item	Docket	Report	Item #	Remarks
1 <sup>st</sup> VIO	05000346	2012002	01	

1 <sup>st</sup> URI	05000346	2012002	02	
2 <sup>nd</sup> VIO	05000346	2012002	03	
1 <sup>st</sup> FIN	05000346	2012002	04	
Item Numbering for Dual-Unit Site				
1 <sup>st</sup> URI	05000295	2012002	01	Unit 1
1 <sup>st</sup> VIO	05000304	2012002	02	Unit 2
1 <sup>st</sup> FIN	05000295	2012002	03	both units
	05000304	2012002	03	
2 <sup>nd</sup> FIN	05000295	2012002	04	Unit 1
2 <sup>nd</sup> URI	05000295	2012002	05	both units
	05000304	2012002	05	

05.04 Charging Time for ROP Activities.

- a. General Guidance. The general guidance on time and labor reporting for inspection related activities is on the RPS “How do I” Webpage at:

<http://nrr10.nrc.gov/nrr-office/rps/how-do-i/timelaborreporting.pdf>

1. Inspection hours are charged to the specific unit on which the inspection was performed. Time must be reported accurately because licensees are billed on the basis of the reported data. In addition, NRC analyzes reported data to assist program refinements and budget formulation (IMC 0307, Appendix B, “ROP Realignment Process”).
2. Time spent performing activities in support of the ROP is entered into the Human Resource Management System (HRMS) in accordance with guidance promulgated by the Office of the Chief Financial Officer (OCFO), NRR, and the regions.
3. A charge code consists of the docket number, inspection report number, task/activity code, and inspection procedure number (for direct inspection activities). The information is entered into RPS during planning, along with personnel assigned to each charge code. The HRMS will then extract the codes and populate them in the assigned personnel’s profile. In order for the appropriate charge codes to appear in the HRMS, updates must be entered into RPS no later than Thursday of the prior week.
4. For inspectors performing inspections in other divisions outside their assigned division, contact the receiving division for assistance with time charges, if not provided to you prior to your inspection.

b. Inspection Activities.

1. Inspection Program Element (IPE) codes are used with the inspection procedures to charge direct inspection activities.
2. The IPE and activity codes are available through the RPS “How do I” Webpage at:

<http://nrr10.nrc.gov/nrr-office/rps/how-do-i/activitycodes.pdf>

The IPE and activity codes contained in this table are the only codes to be used for any inspection related activities supporting the ROP. Inspectors are encouraged to review HRMS literature and training manuals for a description of HRMS terms and the proper fields for time entry of ROP activities in HRMS.

3. Activity codes are used to charge non-direct inspection activities.

c. Assessment Activities (excluding Security and Emergency Preparedness).

1. The assessment report number for each plant is based on the year of the current IPC (i.e., the EOC Annual Assessment letter for CY2013 would be 05000###/2013001).
2. Two annual assessment report numbers are created for each plant every year:

YYYY001 is used for end of cycle assessment. Any assessment activities for the year, except mid-cycle activities between March to August, will be charged to this report number.

YYYY006 is used for MOC assessment. Any mid-cycle assessment activities between March and August will be charged to this report number. The mid-cycle assessment will be closed out at the end of August with the issuance of the mid-cycle assessment report.

3. All assessment related activities are charged to the “ASM” activity code. This includes preparing and conducting all assessment activities (such as quarterly, mid-cycle, end-of-cycle reviews, and other ongoing assessment activities.

d. Security (SG) Assessment Activities.

1. The report number for each plant is based on the year of the current IPC (i.e., the Annual SG Assessment letter for CY2013 would be 05000###/2013401).



2. Two annual assessment report numbers are created for each plant each year:

YYYY401 is used for end of cycle SG assessment report. However, all non-plant non-assessment inspection activities not associated with stand alone SG reports, except mid-cycle activities between March to August, are also charged to this report number.

YYYY402 is used for mid-cycle SG assessment. However, all non-plant non-assessment inspection activities not associated with stand alone SG reports between March and August are also charged to this report number.

3. All SG assessment activities are charged to the “SSM” activity code.
4. For inspection activities, inspection results will be input into the inspection report and any inspection findings will be numbered per Section 05.03 step b. Inspectors should charge their time preparing, inspecting, and documenting SG procedures to the appropriate codes under the SG inspection report.

e. Emergency Preparedness (EP) Assessment Activities.

1. The report number for each plant is based on the year of the current IPC (i.e., the Annual inspection letter for CY2013 would be 05000###/2013501).
2. An inspection report number is created for each plant at the beginning of the IPC (YYYY501 per section 05.03). All assessment activities and non-stand-alone EP reports shall be charged to this report number.
3. All EP assessment activities are charged to the “ESM” activity code.
4. For inspection activities, inspection results will be input into the integrated report for that quarter and any inspection findings will be numbered using the integrated report number per Section 05.03 step b. Inspectors should charge their time preparing, inspecting, and documenting EP procedures to the appropriate codes under the annual EP inspection report number (501).
5. A letter will be issued to the licensee at the end of the calendar year, consistent with the ROP inspection cycle, to close out the annual inspection report number.

05.05 Entering and Updating Inspection Findings in the RPS and Plant Issues Matrix (PIM).

- a. PIM entries are done via the RPS Item Reporting (RPS/IR) module with the “PIM

List?” checked. A typical PIM entry includes the type, title, cornerstone, significance determination, Event Date, who identified the issue, item description, significance description, source document (normally the inspection report number), and a brief summary of corrective actions planned or completed.

- b. The PIM provides a consolidated listing of individual plant issues (i.e., inspection findings) that the NRC uses to assess plant performance. PIM entries are the vital link between inspection reports and information posting to the ROP Webpage. To ensure information posted to the Web is accurate, RPS/PIM entries must be timely and complete.
- c. The PIM shall be updated as soon as practical but no later than 14 days after the issuance of the report (to meet the 60-day web posting due date in Section 05.06).
- d. After all entries have been validated and reviewed for accuracy, populate the sent date with the date the inspection report was provided to the licensee.
- e. In order to close a PIM entry during the close out of an inspection report, a valid ML # must be entered into IRTS.
- f. Required entries and updates in RPS/PIM.
  - 1. All entries in the inspection reports and all issues given an item number are captured in the PIM, with the exception of URI’s. Refer to IMC 0612, Appendix B, “Issue Screening,” for issues required to be documented.
  - 2. A new RPS/PIM entry should be created if an URI issue becomes an AV, FIN, VIO, or NCV and the URI closed.
  - 3. AVs that are later determined to be FINs or VIOs should be updated in RPS based on the inspection report that documents the change in status. AVs should not be closed and reopened as a FIN or VIO, nor should the Event Date be changed.
  - 4. When a report or letter follows up on an existing item (i.e., final SDP letters and supplemental inspection reports), the PIM entry must be updated to reflect the new information. This is to ensure traceability of an issue from discovery to final resolution. Step-by-step guidance for adding and updating PIM entries is located at:

Adding:

<http://nrr10.nrc.gov/rps/how-do-i/ir-add-item-to-specific-rpt.htm>

Updating:

<http://nrr10.nrc.gov/rps/how-do-i/ir-add-open-item-to-another-rpt.htm>

A sample PIM entry for a greater-than-green finding, along with a summary of the process, is included in Section 05.05 step j.

5. When a report or letter discusses an individual item, that report or letter shall be associated with the given item in the PIM. Following the issuance of a report or letter, PIM entries should be created or updated for each item discussed in the RPS/IR module.

g. Special Cases and Examples.

1. Security-Related Inspection Items.

- (1) Follow guidance in IMC 2201, Appendix A, "Security Baseline Inspection Program" for Items identified in security inspection reports.
- (2) Security items will be entered, updated, and closed in IR, and any information such as descriptions should be detailed similar to the content as described in IMC 0612, "Power Reactor Inspection Reports."

2. Unresolved Items (URIs).

- (1) If an item remains unresolved upon issuance of an inspection report, it is designated as a "URI."
- (2) URIs are documented in the body of an inspection report and assigned a tracking number.
- (3) URI's are entered into RPS under the applicable cornerstone, with a type code of "URI," and a significance determination of "N/A" (not applicable). However, do not check the PIM box.
- (4) URIs are closed in RPS based on the inspection report that documents the resolution.

3. Significance To Be Determined.

- (1) The final risk significance of a finding is determined during the significance determination process (SDP).
- (2) Potentially or preliminary greater-than-green findings shall be entered into RPS under the applicable cornerstone, with a "Type" code of "AV" or "FIN," and with a significance determination of "TBD" (to be determined).
- (3) Once the final characterization is determined and the final

significance determination letter has been issued, the item description and significance determination is updated in the PIM per the guidance on the RPS “How do I” Webpage (<http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf>) to reflect the latest information. The “Type” code can be “FIN,” “VIO,” or “NCV.” Do not change the “Event Date.”

4. Cross Cutting Aspects. For any inspection findings assigned a cross-cutting aspect, the appropriate cross-cutting aspect box is checked in the RPS/IR “General” tab. The cross-cutting area boxes will automatically reflect the cross-cutting area of the selected cross-cutting aspect.
5. Parallel PI Inspection Findings.
  - (1) Refer to IMC 0305 regarding this type of findings.
  - (2) When entering these findings in RPS, input enough detail to note the associated PI and that these findings are parallel PI inspection findings.
  - (3) Any new issues identified during the supplemental inspection beyond the scope of the original issue(s) are entered into the PIM as separate entries and are assigned the appropriate significance via the SDP.
6. Supplemental Inspection Results for Inspection Findings.
  - (1) Summary of supplemental inspection results is added to the original inspection finding item in RPS.
  - (2) This item number is closed via “Update Item” and the summary of supplemental inspection results is entered into RPS using the procedure available on the RPS “How do I” Webpage at:  
<http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf>
  - (3) Additional inspection findings identified during the supplemental inspection beyond the scope of the original finding(s) are entered in the PIM as new entries and are assigned the appropriate significance via the SDP.
7. Independent Items.
  - (1) In the RPS/IR module, under “Topics,” the “Independent Items” are used to track information from sources other than inspection reports in accordance with definitions in IMC 0612.
  - (2) The following items should be tracked in RPS: Licensee Event

Reports (type code “LER”), Confirmatory Orders (type code “ODR”), issues identified under 10 CFR Part 21 (type code “P21”), Safeguard Event Report (type code “SGI”), and other items. Information related to safeguards events should contain no greater detail than its associated initial Event Notification Report. Do not enter SUNSI-related information.

- (3) Independent items are not included in the PIM. If the NRC will use the issue(s) not originating from an IR to assess plant performance (for examples, the investigation of a harassment and intimidation case by the NRC’s Office of Investigation), the issue(s) must be discussed and referenced in the next resident report and then entered into the PIM.
- (4) The NRC staff shall take care to ensure that previously undocketed information that was not intended for public release is not introduced into the inspection reports and the PIM. Guidance on entering items such as Confirmatory Orders can be found on the RPS “How do I” Webpage:

<http://nrr10.nrc.gov/rps/how-do-i/ir-orders.pdf>

8. Findings Held Open Greater Than 4 Quarters. Findings that are being held open greater than 4 quarters shall remain open in IR until the end of the quarter in which the inspection report closing the finding is issued.

For example, if the inspection report closing a finding that has been held open for greater than 4 quarters is issued on July 1, 20XX, then the finding shall be closed on September 30, 20XX.

9. Findings With Violations Receiving Enforcement Discretion. Certain findings that have associated violations receiving enforcement discretion have different evaluation criteria in the assessment process. Please refer to IMC 0305 for guidance on findings qualified for this condition. For those findings, entries will be made in RPS/PIM, with explanation of the discretion, so they would be assessed properly in accordance with IMC 0305.
10. Notice of Enforcement Discretion (NOED). When a Notice of Enforcement Discretion (NOED) is granted, no violations/findings will be entered in RPS. Any findings/violations associated with follow up inspections on NOED will follow guidance in IMC 0612. Refer to IMC 0612 for use of URIs with NOED.
11. Traditional Enforcement (TE) Violations.
  - (1) If a TE violation does not have an associated finding (e.g., no performance deficiency), choose “TE” as the “Type” code in RPS/IR.

The “TE?” checkbox will automatically be checked, and the “Cornerstone,” “Significant Determination” and “Cross Cutting Areas” fields will be grayed out. Choose the applicable “TE Severity Level” from the drop down menu.

- (2) If a TE violation has an associated finding, choose the proper “Type” code (NCV or VIO) and check the “TE?” checkbox. Enter the applicable “Cornerstone,” “Significant Determination,” and “Cross Cutting Areas” attribute to the finding, and choose the applicable “TE Severity Level” attributed to the violation.
- (3) If a finding and a TE violation need to be tracked separately, cross reference both records in the text section. For example, if additional time is required to investigate the TE violation (i.e., willfulness):
  - (a) Create a record for the finding with “FIN” as the type code;
  - (b) Create another record with “URI” as the “Type” code and document the potential TE violation in the text.
  - (c) When the TE violation is finalized, change the “Type” code from “URI” to “VIO” or “NCV” and check “TE?” check box.
  - (d) If there is no TE violation after investigation, close out the URI.
  - (e) In both records (a) and (b), cross reference each other in the text field.

#### h. Producing PIM Reports.

1. RPS/IR Report 4, “ROP PIM Report,” may be used to generate a PIM report by site, docket, or region for a specified time period. By default, PIM reports are sorted by cornerstone and the time period is a full year from the day the report is requested; however, users may select different sorting criteria and time frames.
2. Non-ROP related PIM reports can be obtained using RPS/IR Report 3, “Non-ROP PIM Report,” for inspection findings for any site and time period prior to initial implementation of the ROP (before April 2000). Additionally, the RPS Dynamic Webpage provides numerous categorized reports.

#### i. Plant Inspection Findings Webpage.

1. The Plant Inspection Findings Webpage displays the summary of inspection findings entered in the PIM.
2. This Webpage includes all issues designated as “VIO,” “FIN,” “AV,” and NRC identified and self-revealing “NCV.”

3. Findings and PIs in the Security cornerstone will not be made public. However, any historical data entered before the third quarter 2004 will still remain available on the [Webpage](#). NRC employees may gain access to the current Security PIs and inspection findings [through](#) ROP Digital City [at](#):

<http://nrr10.nrc.gov/rop-digital-city/index.html>

j. Sample PIM Entry/ Inspection Finding Display on Web.

Below is a sample web display for a typical greater-than-green finding that has been processed through the SDP and the supplemental inspection has been completed. Additional guidance for making and revising PIM entries is available at:

<http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf>

Initial Entry: In this example, the initial preliminary finding was entered into the PIM in RPS/IR a few days after the inspection report was issued (IR# 05000xxx/2003012 dated [September 8, 2003](#)). The text was taken from the IR's summary of findings and entered in the "item description/significance" field. The type was entered as "AV" and the significance was entered as "TBD." The ["Event Date"](#) was entered corresponding to the end of the [last day of onsite inspection activities in which the item was identified as an "AV" \(July 28, 2003\)](#).

First Update: The original PIM entry was updated in RPS/IR shortly after the final SDP letter was issued (IR# 05000xxx/2003015 dated December [7, 2003](#)). The additional text summarizing the final significance determination was added to the "item description/ significance" field. The type was changed [from "AV" to "VIO"](#) and the significance was changed [from "TBD" to "WHITE."](#) The IR# for the final SDP letter was added to the "History" tab resulting in the IR# being included at the bottom of the web entry with a hyperlink to the report itself. The ["Event Date"](#) was not changed.

Second Update: The original PIM entry was updated in RPS/IR shortly after the supplemental inspection report was issued (IR# 05000xxx/2004004 dated March 14, 2004). The additional text summarizing the supplemental inspection results was added to the "item description/ significance" field. The IR# for the supplemental inspection report was added to the "History" tab resulting in the IR# being included at the bottom of the web entry with a hyperlink to the report itself. Again, the ["Event Date"](#) was not changed.

This example demonstrates the process necessary to ensure that the PIM entries on the web provide traceability of an issue from discovery to final resolution. The updates to the ROP [Webpage](#) will occur in accordance with the schedule described in section 05.06 or as soon as possible if there is a known change in licensee performance and resultant NRC actions. In order to update



the web in a timely manner, regional staff must notify NRR's Performance Assessment Branch (IPAB) staff any time they reach a final determination or obtain clarifying information affecting a plant and its placement in the ROP [AMS](#). The finding will appear on the Plant Inspection Findings [Webpage](#) for four quarters from the original finding date unless specific actions are taken to hold the finding open in accordance with IMC 0305.

**Significance:** WHITE Date: [July 28](#), 2003

Identified By: NRC

Item Type: VIO Violation

**Failure to Prepare a Shipment of Radioactive Waste to Satisfy External Package Radiation Level Limits**

**(Initial Entry)**

An apparent violation was identified for the failure to prepare a package of radioactive material for shipment so that the radiation level does not exceed 200 millirem/hour at any point on the external surface of the package. Package surface radiation levels in excess of 200 millirem/hour were identified by a waste processing contractor upon receipt of the shipment from the licensee.

The finding was more than minor because it was associated with the "Program and Process" attribute of the Public Radiation Safety Cornerstone, and affected the cornerstone objective of ensuring adequate protection of public health and safety from exposure to radioactive materials.

(IR# 05000xxx/2003012 dated [September 8](#), 2003)

**(First Update)**

The finding was determined to be of low to moderate safety significance (White) because the transportation problem involved an external package radiation level that exceeded limits by 25 percent and because the area of elevated radiation on the package was determined to be accessible to a member of the public during conditions normally incident to transportation.

(IR# 05000xxx/2003015 dated [December 7](#), 2003)

**(Second Update)**

The NRC performed a supplemental inspection to assess the adequacy of the licensee's evaluation, extent of condition/cause review and associated corrective actions. The inspector determined that the licensee performed an adequate evaluation of the specific performance issue and that comprehensive corrective actions were completed to address each of the specific causes.

(IR# 05000xxx/2004004 dated [March 14](#), 2004)

Inspection Report# : [2003012\(pdf\)](#) [hyperlink to original IR]

Inspection Report# : [2003015\(pdf\)](#) [hyperlink to final SDP letter]

Inspection Report# : [2004004\(pdf\)](#) [hyperlink to supplemental IR]



05.06 ROP Web Posting Process, Content and Schedule.

a. Web Posting.

1. The table below provides due dates for data submissions and updates to the ROP Webpages. When a due date falls upon a weekend or federal holiday, the due date is the next federal working day.

Information	Due date (Days following the end of the calendar quarter)
Licensees submit Performance Indicators	21 days
HQ archives previous quarter data in historical performance Webpages	21 days
IPAB posts updated Performance Indicators, PIM results, and inspection reports to internal Webpage for review	24 days (or 3 business days after licensee submittal date)
Regions send AMS email message to ROPassessment.Resource@nrc.gov	30 days
IPAB posts Performance Indicators, available PIM entries, inspection reports, and Action Matrix Summary (AMS) to internal and external Webpages	35 days
Regions send assessment follow-up letters to licensees (if applicable) and email them to ROPassessment.Resource@nrc.gov	49 days
IPAB updates assessment letter Webpage and AMS, if applicable.	51 days
IPAB reposts information to the internal and external ROP Webpages to capture updated PIM and IR.	60 days
Regions send mid-cycle or annual assessment letters to licensees and email them to ROPassessment.Resource@nrc.gov	63 days

IPAB updates assessment letter and Substantive Cross-Cutting Issue (SCCI) summary webpages at the end of mid-cycle and end-of-cycle periods	65 days
Corrections or change in SDP of any findings (greater-than-green)	As needed
Regions send AMS for Action Matrix changes that occur at times other than the quarterly reviews	7 days after information is publicly available
Changes to AMS (along with findings, inspection reports, and assessment letters) posted to external Webpage (outside of quarterly input)	14 days after information is publicly available

2. On the 35<sup>th</sup> day and 60<sup>th</sup> day following the end of each quarter, the ROP Webpage will be updated with the latest available PIM entries (from the RPS/IR module), inspection reports (from ADAMS), and related inspection findings. The 60<sup>th</sup> day posting is to include any newly issued inspection reports and updated PIM that were not captured by the first posting.
3. When there is a change in Action Matrix column designation, the PIM entries and related inspection reports are posted as soon as practical after the reports become publicly available. These updates include the final significance determination that resulted in a risk significance that is greater-than-green or a final enforcement decision that resulted in a notice of violation being issued.
4. The ROP Webpages will also be updated on an as needed basis to correct any discrepancies, omissions in previously posted information, or if there is a change in licensee performance (generally for greater-than-green findings) and resultant NRC actions.

b. Performance Indicators.

1. Licensees submit quarterly PI data, in accordance with NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," to the NRC typically within 21 days following the end of the reporting period.
2. Within 3 business days after the due date of the licensees' data transmissions, the PI data, indicator values, and associated graphs are posted to the NRC's internal ROP Webpage. The regions then review the PIs and determine the Action Matrix designations, as well as identify any errors prior to public release.
3. The NRC posts the PIs, along with the latest inspection findings and Action Matrix designations, to the agency's internal and external ROP Webpages 35 days following the end of each quarter.

4. **Licensees** are expected to submit changes to PI data as soon as practical, but no later than the end of the quarter **in which** an error **is discovered**. The NRC then updates the ROP **Webpage** accordingly.

c. Inspection Reports.

1. The regions are responsible for entering:
  - (1) **Inspection** reports into ADAMS in accordance with the ADAMS template;
  - (2) **Inspection** report ADAMS accession number into IRTS; **and**
  - (3) **Latest** inspection findings into the PIM in accordance with this manual chapter.
2. In order to support posting these documents to the ROP **Webpage**, inspection reports must be:
  - (1) **Processed** and declared in ADAMS as publicly available;
  - (2) **The** release date **in ADAMS is** at least a day before the date of posting;
  - (3) **Placed** in the applicable site subfolder within the “Power Reactor Correspondence” folder of ADAMS;
  - (4) **The Inspection Report “Sent Date” must be entered; and**
  - (5) **For integrated reports:**
    - (a) **The Inspection “Completion Date” must be on the last day of the quarter the inspection is in, and**
    - (b) **The Inspection “Close Date” must be before the sweep date (Section 05.06 step a.1).**
3. **When it is** necessary to reissue inspection reports to correct inaccuracies, an ERRATA report must be issued.
  - (1) **The ERRATA report consists of:**
    - (a) **The basis for ERRATA;**
    - (b) **History of the issue, including the ADAMS ML# for the original report; and**
    - (c) **Sections that are affected by corrections. It is not necessary**

to include unaffected sections of the original report.

(2) The ERRATA and the original inspection report should be combined into an ADAMS Package, and the ML# for this package is then placed in the appropriated field in the RPS/IRTS for that report.

4. For security inspection reports, only the security report cover letter will be posted to the external Webpage. For the stand alone cover letter, the regions will issue a new cover letter with a distinct ADAMS accession number; this number is then placed in the appropriate field in RPS/IRTS

d. Assessment Letters and Inspection Plans.

1. Mid-cycle letters and annual assessment letters with inspection plans are issued for all plants within 63 days after the completion of the second and fourth calendar quarters, respectively, in accordance with IMC 0305. These letters are placed on the public Webpage within two business days after they are dated and sent to licensees.

2. Assessment follow-up letters are typically issued within 49 days after the completion of the first and third calendar quarters only for those plants that crossed performance thresholds, in accordance with IMC 0305.

Assessment follow-up letters typically do not include updated inspection plans, however, they may note any inspection plan changes associated with forthcoming supplemental inspections. These letters are placed on the public Webpage within two business days after they are dated and sent to licensees.

3. Assessment follow-up letters can also be issued on an as-needed basis between the quarterly reviews. These letters are placed on the public Webpage within 14 days after they are dated and sent to licensees to allow time for the other assessment-related Webpages to be updated.

4. The regions are responsible for entering:

(1) Assessment letters and inspection plans into ADAMS in accordance with the ADAMS template, and

(2) Assessment report ADAMS accession number into IRTS.

5. To support posting these documents to the NRC's public "ROP List of Assessment Reports/Inspection Plans" Webpage in a timely manner, assessment letters and inspection plans must be properly entered and declared in ADAMS and should be placed in the appropriate site subfolder within the "Power Reactor Correspondence" folder of ADAMS.

6. The regional offices shall email all issued assessment letters and

inspection plans to [ROPAssessment.Resource@nrc.gov](mailto:ROPAssessment.Resource@nrc.gov). IPAB staff will transfer the letters to the Q:\ drive and work with NRRWebservices Resource to place them on the public Webpage.

- e. Substantive Cross-Cutting Issues (SCCIs). SCCIs are identified during the mid-cycle and end-of-cycle performance review meetings and documented in the associated assessment letters. IPAB will update the NRC's public "ROP Substantive Cross Cutting Issues Summary" Webpage within two business days after the mid-cycle or annual assessment letters are available on the NRC's public "ROP List of Assessment Reports/Inspection Plans" Webpage.

f. Assessment-Related Webpages.

1. Action Matrix Webpage.

- (1) IPAB updates the NRC's public "ROP Action Matrix Summary and Current Regulatory Oversight" Webpage quarterly (35 days after the end of the quarter) after receipt of the regions' Action Matrix Summaries (AMSs) and as needed in accordance with assessment letters (within 14 days after they become publicly available).
- (2) To support timely changes to this Webpage, the regional offices shall place [ROPAssessment.Resource@nrc.gov](mailto:ROPAssessment.Resource@nrc.gov) on distribution for the following correspondence:
  - (a) All assessment letters (i.e., assessment follow-up letters, mid-cycle letters, and end-of-cycle letters);
  - (b) Supplemental inspection reports; and
  - (c) Final SDP letters.
- (3) Within 30 days following the end of each calendar quarter, each region must email an AMS to [ROPAssessment.Resource@nrc.gov](mailto:ROPAssessment.Resource@nrc.gov) that describes:
  - (a) Action Matrix column assignments for all plants in the region;
  - (b) Basis for the column assignments; and
  - (c) Level of regulatory oversight. For all plants, describe the level of oversight (e.g., baseline inspection, IP 9500X supplemental inspection, IMC 0350 or IMC 0351 process, or Action Matrix deviation).

The column assignments and level of oversight shall be determined using the guidance in IMC 0305.

- (4) Each region should email an ASM containing the same information as in (3) above for Action Matrix changes that occur at times other than the quarterly reviews, such as:
- (a) Reaching a final significance determination;
  - (b) Issuing an assessment follow-up letter;
  - (c) Completing a supplemental inspection;
  - (d) Issuing a supplemental inspection report;
  - (e) Notifying a licensee of an Action Matrix deviation; or
  - (f) Obtaining information affecting a plant and its placement in the Action Matrix.

The regional office shall email the AMS no later than 7 days after the information becomes publically available to support the ROP update.

Before submitting this new information, the regional staff should update the PIM entries so that information can be verified and included on the ROP Webpage.

- (5) For plants that are in Column 2, 3, 4, or 5, the basis for the Action Matrix column assignment should include the following:
- (a) Safety-significant findings or PIs that caused the movement;
  - (b) Affected cornerstone(s); and
  - (c) Quarters in which the safety-significant Action Matrix inputs exist.

See sample below.

Once the email is received, IPAB posts the AMS to the NRC's public "ROP Action Matrix Summary and Current Regulatory Oversight" Webpage to describe to the public the reason a plant is not in Colum 1, the status of current regulatory oversight, and any open Action Matrix deviations.

<u>Sample format for AMS data submittal:</u>	
Plant	List plant.
Action Matrix column	List column.
Basis for Action Matrix column	List basis if not in Column 1.
Current oversight	List status of supplemental inspections

	and other oversight actions beyond the baseline. If none, state "Baseline".
Deviations	List open Action Matrix deviations.

Sample language for column basis:

Plant X is in Column 2 because of one white inspection finding in the Emergency Preparedness Cornerstone originating in 2Q20YY. Additionally, one red inspection finding in the Mitigating Systems Cornerstone originating in 4Q20YY is being considered as an old design issue in accordance with IMC 0305 and is not considered as an Action Matrix input.

Plant Y is in Column 3 because of one yellow inspection finding in the Mitigating Systems Cornerstone originating in 3Q20YY. This finding is being held open, in accordance with IMC 0305, for greater than 4 quarters because (...give details from the correspondence to licensee describing the extension on the inspection finding).

Plant Z is in Column 4 because of one yellow inspection finding in the Public Radiation Safety Cornerstone originating in 1Q20YY and three white Action Matrix inputs in the Reactor Safety Strategic Performance Area, including one white PI in the Initiating Events Cornerstone (provide the name of the PI) from 3Q20YY through 2QYY, one white inspection finding in the Mitigating Systems Cornerstone originating in 3Q20YY, and one white inspection finding in the Barrier Integrity Cornerstone originating in 2Q20YY.

Sample language for current oversight:

An IP 95001 supplemental inspection will be conducted to address the X finding in the Y cornerstone.

An IP 95002 supplemental inspection was successfully completed (exited) on MM DD, 20YY, and barring any additional significant inputs into the Action Matrix, Plant X will return to Column 1 at the end of 4Q20YY.

An IP 95003 supplemental inspection was successfully completed (exited) on MM DD, 20YY, and by an assessment follow-up letter dated June 24, 20YY, Plant X was transitioned to Column 1.

Sample language for deviations:

In accordance with IMC 0305, the staff is deviating from the ROP Action Matrix as described in the assessment follow-up letter dated MM DD, 20YY.

2. Action Matrix Deviations Webpage.

- (1) Within 14 days after a licensee has been notified of an Action Matrix deviation, IPAB will update the NRC's public "ROP Action Matrix Deviations" Webpage to notify the public of the deviation and the basis for the deviation.
- (2) The regional office shall place [ROPAssessment.Resource@nrc.gov](mailto:ROPAssessment.Resource@nrc.gov) on distribution of the assessment follow-up letter describing the deviation.

The email should also contain a description of the deviation as it should appear on the public Webpage. IPAB may modify the text as necessary before posting it to the public Webpage. The description should include:

- (a) Affected reactor units;
- (b) Date the EDO approved the deviation;
- (c) Description of the deviation;
- (d) Description of when the deviation is expected to be closed; and
- (e) Description of changes to ROP guidance, if applicable.

0306-07 REFERENCES

IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual"

IMC 0307, Appendix B, 'ROP Realignment Process'

IMC 0320, "Operating Reactor Security Oversight Program"

IMC 0612, "Power Reactor Inspection Reports"

IMC 0612, Appendix B, "Issue Screening"

IMC 2201, Appendix A, "Security Baseline Inspection Program"

IMC 2515, "Light Water Reaction Inspection Program"

5 USC 552a, "Records maintained on individuals"

10 CFR Part 9, "Public Records"



NEI 99-02, "Regulatory Assessment Performance Indicator Guideline"

ATTACHMENT 1

Revision History for IMC 0306

Commitment Tracking Number	Issue Date	Description of the Change	Training Required	Training Completed	Comment Resolution Accession Number
N/A	04/04/07	Researched commitments back four years - none found.	N/A	N/A	N/A
N/A	04/04/07 CN 07-012	Revised to inform the Program Offices and the Regions of updated guidance and procedures for the RPS and the ROP <a href="#">Webpage</a> .	N/A	N/A	ML070790675
N/A	12/04/08 CN 08-034	Revised to include guidance on Confirmatory Orders, clarifying the use of URI's, and Security items being entered into the PIM. In addition to incorporate feedback from stakeholders.	N/A	N/A	ML083290136
N/A	11/17/11 CN 11-036 ML111430179	Rewrite for organization.. Revised to make the format consistent with IMC 0040; to improve readability; to incorporate changes resulted from FBF (1579, 1516, 1488 and 1388); to correct outdated guidance; and to be consistent with IMC 0612 and 0305.	N/A	N/A	