

## APPENDIX B

### SUPPLEMENTAL INSPECTION PROGRAM

#### A. OBJECTIVES AND PHILOSOPHY OF THE SUPPLEMENTAL INSPECTION PROGRAM

The supplemental inspection program is designed to support the NRC's goals of maintaining safety, enhancing openness, improving the effectiveness, efficiency and realism of the regulatory process, and reducing unnecessary regulatory burden. While the baseline inspection program and performance indicators should provide sufficient information to allow the NRC to meet the goal of assuring licensees are maintaining safety at facilities with an absence of risk significant performance issues, additional supplemental inspections are generally required<sup>1</sup> to provide enhanced information regarding safety at facilities where risk significant performance issues have been identified. These performance issues may be identified either by inspection findings evaluated using the significance determination process (SDP) or when performance indicator thresholds are exceeded.

The breadth and depth of the supplemental inspections increase in proportion to the relative risk significance of the identified performance issues and will be based upon the guidance provided in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program" for the NRC's assessment "Action Matrix."

#### B. APPLICABILITY

The supplemental inspections contained in this Appendix apply to all strategic performance areas and associated cornerstones of safety. The inspection report written for the supplemental inspections should contain the NRC's assessment for each inspection requirement. These inspection requirements are independent of whether the performance issues were the result of performance indicators or inspection findings. The resource estimates provided in each supplemental inspection procedure (IP) are estimates only, and may vary considerably due to the complexity of the issue(s) and the thoroughness of the licensee's own evaluations and proposed corrective actions.

#### C. DESCRIPTION OF SUPPLEMENTAL INSPECTION PROGRAM

The supplemental inspection program contains three procedures which become deeper and broader as the safety significance of the performance issues increases. IMC 0305 contains guidance on when to perform each type of supplemental inspection.

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<sup>1</sup> Note that IMC 0305 allows for possible exceptions.

SUPPLEMENTAL INSPECTION OVERVIEW

Supplemental Inspection Procedure (IP)	Scope	Assessment of Supplemental Inspection Findings
IP 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area"	Review licensee's evaluation of root and contributing causes, extent of condition and cause, and corrective actions. Inspection limited to specific issue(s) or performance area of concern.	Significant weaknesses in the licensee's evaluation may result in expansion of the inspection to independently acquire the information necessary to satisfy the inspection objectives. The original issue may be "Held Open" in the Action Matrix until the weaknesses in the evaluation are addressed and corrected (refer to IMC 0305 for additional guidance).
IP 95002, "Supplemental Inspection for One Degraded Cornerstone or any Three White Inputs in a Strategic Performance Area"	Review licensee's evaluation of root and contributing causes, extent of condition and cause, and corrective actions for both for individual and collective issues. Determine if safety culture components caused or significantly contributed to risk significant performance issues. Independently assess the licensee's extent of condition using inspection procedures selected from Attachment 1.	
IP 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs or One Red Input"	Inspection evaluates the key attributes of affected strategic performance areas to determine if continued operation of the facility is acceptable and whether additional regulatory actions are necessary. Independently assess the extent of risk significant issues, the adequacy of the programs and processes used to identify, evaluate, and correct performance issues. Independently evaluate the adequacy of programs and processes in the affected strategic performance areas. Gain insights into the overall root and contributing causes of identified performance deficiencies. Determine if the NRC oversight process provided sufficient warning to significant reductions in safety. Evaluate the licensee's third-party safety culture assessment and conduct a graded assessment of the licensee's safety culture based on evaluation results.	Results of this supplemental inspection will be assessed to determine if additional agency actions are warranted and whether the facility should be ordered to shut down and be placed under IMC 0350.

The portions of the licensee's evaluation concerning extent of condition will be assessed independently by the NRC during both the IP 95002 and IP 95003 inspections. This independent assessment **should** be conducted using inspection procedures selected from tables that list the procedures by cornerstone and key attribute provided in Attachment 1 to this Appendix. The objective of this inspection will be to ensure that the licensee has properly identified the scope (extent) of the issues and that the proposed corrective actions are sufficiently comprehensive. The inspection procedures listed in the Attachment 1 tables include: baseline inspection procedures (portions of which can be repeated with additional samples); procedures that were part of the core, regional initiative, and temporary instruction portions of the old inspection program; and new inspection procedures written solely for the purpose of performing supplemental inspection. A combination of procedures or portions of procedures can also be used as appropriate. Inspection hours utilized in fulfilling this inspection requirement should be charged to IP 95002 or IP 95003 as appropriate, regardless of the specific procedure(s) chosen for implementation.

#### D. ASSESSING INSPECTION FINDINGS

If, significant weaknesses are identified in the licensee's actions to address a performance issue, including a substantial inadequacy in the licensee's evaluation of the root causes of the original performance issue, determination of the extent of the performance issue, or the actions taken or planned to correct the issue; during IP 95001 or 95002, the supplemental inspection would generally be expanded as necessary to satisfy the inspection objectives. The original performance issue would generally be "Held Open" in the Action Matrix until the significant weaknesses in the licensee's evaluation are addressed and corrected (refer to IMC 0305 for additional guidance). When the licensee's performance indicates the need to open a parallel PI finding or holding open a finding past four quarters in the Action Matrix, an inspection report should be issued which describes specific licensee deficiencies and clearly states the necessary licensee actions required to meet all supplemental inspection objectives.

General weaknesses associated with the licensee's evaluation of the performance issue shall be briefly described in the transmittal letter and documented as observations in the summary of findings and details sections in the inspection report. Additional focus may be given to those areas during the next biennial problem identification and resolution baseline inspection conducted in accordance with IP 71152, "Problem Identification and Resolution".

New or additional performance issues identified during supplemental inspections should be inspected and screened in accordance with IMC 0612, Appendix B, "Issue Screening."

Significant weaknesses identified during performance of IP 95003 will be assessed to determine if additional agency actions are warranted and whether the facility should be ordered to be shut down. In such cases, the facility will be placed under IMC 0350.

END

## ATTACHMENT 1

### INSPECTION PROCEDURES TO BE USED FOR ASSESSING EXTENT OF CONDITION

#### INITIATING EVENTS

Protection Against External Events	Human Performance	Procedure Quality	Equipment Performance	Design	Configuration Control
71111.01 71111.05 71111.06	41500 71715 71841	42700 72701	50002 55050 55100 56700 61726 62700 62706 62709 71111.07 71111.08 71111.12 71111.13 93805	50002 52003 93803 93807 93811	62709 71111.04 71111.13 71111.20
General Inspection Procedures					
90700 90712 92700 93801 93802 93806					

See <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html> for the complete list of all current non-security inspection procedures.

## MITIGATING SYSTEMS

Design	Protection Against External Events	Configuration Control	Equipment Performance	Procedure Quality	Human Performance
52003 56700 62710 71111.17 71111.18 71111.21 93803 93807 93810 93811	71111.01 71111.05 71111.06	62709 71111.04 71111.13 71111.20	38703 49001 55050 55100 56700 57050 57060 57070 57080 57090 61726 62002 62700 62706 62708 62709 62710 70370 71111.07 71111.12 71111.13 71111.15 71111.17 71111.18 71111.19 71111.21 71111.22 73756 93805 93810 93811	42001 42700 72701 73052	36301 41500 71111.11 71715 71841
General Inspection Procedures					
90700 90712 92700 93801 93802 93803 93804 93806					

See <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html> for the complete list of all non-security related inspection procedures.

**BARRIER INTEGRITY**

Fuel Cladding Performance	RCS Equip. & Barrier Performance	Containment SSC & Barrier Performance	Human Performance	Procedure Quality	Design Control	Configuration Control
61705	55050	38703	41500	42700	50002	62709
61706	55100	49001	71111.11	70307	71111.17	71111.04
61707	56700	50002	71715	72701	71111.18	71111.13
61708	57050	55050	71841	73052	93803	71111.20
61709	57060	55100			93811	
61710	57070	56700				
	57080	57050				
	57090	57060				
	61728	57070				
	62700	57080				
	62706	57090				
	62709	61715				
	71111.08	61720				
	71111.12	62002				
	71111.13	62003				
	71111.17	62700				
	71111.18	62706				
	71111.22	62709				
	73051	70313				
	73753	70323				
	73755	70370				
	73756	71111.12				
	93805	71111.13				
		71111.17				
		71111.18				
		71111.22				
		93805				
General Inspection Procedures						
90700						
90712						
92700						
93801						

See <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html> for the complete list of all non-security related inspection procedures.

EMERGENCY PREPAREDNESS

ERO Readiness	Facilities and Equipment	Procedure Quality	ERO Performance	Offsite EP
71114 82001 82201 82202	71114 82001 82201 82202	71114 82001 82201 82202	82001	No NRC inspection of this key attribute. - Evaluation performed by FEMA

See <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html> for the complete list of all non-security related inspection procedures.

PUBLIC RADIATION SAFETY

Facilities/Equipment	Program/Process	Human Performance
83502 83502.01 83502.02 83521 83527 84522 84523 84524 84750 86750	42400 80521 83502 83502.01 83502.02 83502.03 84522 84524 84750 86740 86750	41500 71841 83502 83502.01 83502.02 83502.03 83523 83723 84524 84750 86740 86750

See <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html> for the complete list of all non-security related inspection procedures.

OCCUPATIONAL RADIATION SAFETY

Facilities and Equipment	Program/Process	Human Performance
83527 83528 83724 83725	42400 79702 83501 83528 83724 83725 83728 83750	41500 71841 83501 83528 83723 83724 83750

See <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html> for the complete list of all non-security related inspection procedures.

SECURITY

Physical Protection System	Access Authorization System	Access Control System	Response to Contingency Events
71130.01	71130.01	71130.02	71130.01
71130.02	71130.02	71130.04	71130.02
71130.03	71130.04	71130.05	71130.03
71130.04	71130.05	71130.07	71130.04
71130.05	71130.07	65001.17	71130.05
71130.06	71130.08		71130.06
71130.07	65001.17		71130.07
71130.08			71130.08
71130.14			71130.14
65001.17			65001.17

Refer to the internal Web page for the complete list of all security-related inspection procedures.  
<http://nrr10.nrc.gov/rop-digital-city/insp-documents/inspection-manual-reports.html>

END



Attachment 2 – Revision History for IMC 2515 Appendix B

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
	04/03/00 <a href="#">CN 00-003</a>	Updated for ROP to include list of procedures that can be used to follow up on risk significant inspection activities.			
	09/12/00 <a href="#">CN 00-018</a>	Revised to include newly issued IP 62708, "Motor-Operated Valve Capability) and to delete IP 50001, "Steam Generator Replacement Inspection." IP 50001 has been moved to IMC 2515, Appendix C.			
N/A	03/06/01 <a href="#">CN 01-006</a>	Revised to include new IP 62710, "Power-Operated Gate Valve Pressure Locking and Thermal Binding."	N/A	N/A	
N/A	1/17/2002 <a href="#">CN 02-001</a>	Revised to include new IP 62710, "Power-Operated Gate Valve Pressure Locking and Thermal Binding."	N/A	N/A	N/A
N/A	3/23/2005 <a href="#">ML050770156</a> <a href="#">CN 05-008</a>	Revised to add IP 56700, 82201, 82202, and 90700 to Attachment 1.	N/A	N/A	N/A
N/A	01/26/07 <a href="#">ML061580281</a> <a href="#">CN 07-004</a>	Added IP 61726, "Surveillance Observations" to list of IPs to be used for assessing extent of condition (FF IMC2515B-919). Completed 4 year historical change notice search.	N/A	N/A	<a href="#">ML063460228</a>
N/A	10/29/09 <a href="#">ML092300213</a> <a href="#">CN 09-025</a>	Revised to add IP 52003 and remove references to previously deleted procedures.	N/A	N/A	N/A

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	02/09/11 ML102090718 CN 11-001	Revised to remove redundant and contradicting assessment guidance since this guidance resided in IMC 0305. Updated Attachment 1 to reflect currently available procedures. Deleted the old Attachment 2 and since it is redundant to the information maintain on the web. Renamed Attachment 3 to Attachment 2.	N/A	N/A	<a href="#">ML110130130</a>
N/A	08/18/11 ML111870266 CN 11-013	Updated Attachment 1 to reflect the current security and radiation safety procedures.	N/A	N/A	N/A