SIGNIFICANCE DETERMINATION PROCESS

0609-01 PURPOSE

The Significance Determination Process (SDP) uses risk insights, where appropriate, to help NRC inspectors and staff determine the safety or security significance of inspection findings identified within the seven cornerstones of safety at operating reactors. The SDP is a risk-informed process and the resulting safety significance of findings, combined with the results of the risk-informed performance indicator (PI) program, are used to define a licensee's level of safety performance, and to define the level of NRC engagement with the licensee. Each SDP supports a cornerstone associated with the strategic performance areas as defined in Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program- Operations Phase" and IMC 2201, "Security and Safeguard Inspection Program for Commercial Power Reactors." The SDP determinations for inspection findings and the PI information are combined for use in assessing licensee performance in accordance with guidance provided in IMC 0305, "Operating Reactor Assessment Program" and IMC 0320, "Operating Reactor Security Assessment Program."

The staff should recognize the importance of completing SDP evaluations in a timely manner in order to promptly direct NRC resources to those licensees with relatively weaker performance. However, for some findings where circumstance may require delay in the issuance of final significance determination, the guidance of this inspection manual chapter should be implemented.

0609-02 OBJECTIVES

02.01 To characterize the safety or security significance of inspection findings for the NRC Reactor Oversight Process (ROP), using best available risk insights as appropriate.

02.02 To provide all stakeholders an objective and common framework for communicating the potential safety or security significance of inspection findings.

02.03 To provide a basis for timely assessment and/or enforcement actions associated with an inspection finding.

02.04 To provide inspectors with plant-specific risk information for use in risk-informing the inspection program.

0609-03 APPLICABILITY

03.01 The SDPs described in the Appendices of this Manual Chapter are applicable to inspection findings identified through the implementation of the NRC inspection program

described in IMC 2515 and IMC 2201. Before determining significance, each inspection finding must be screened to determine if it is a performance deficiency that is "more than minor" using the guidance provided in IMC 0612, Appendix B, "Issue Screening" and/or Appendix E, "Examples of Minor Issues." Violations with no associated performance deficiency are not findings and will not be subject to these SDPs. Conditions that do not represent deficient licensee performance are not subject to this guidance but may need to be addressed by other NRC processes (e.g., Back-fit Rule, Generic Safety Issues, rule-making).

03.02 Nothing in this guidance relieves any licensee from fully complying with Technical Specifications (TS), licensing basis commitments, or other applicable regulatory requirements. Continued compliance with regulatory requirements maintains the requisite defense-in-depth and safety margins necessary to achieve adequate protection of public health and safety.

03.03 The risk significance of actual reactor events caused or complicated by equipment malfunction or operator error must be assessed by NRC risk analysts in accordance with IMC 0309, "Reactive Inspection Decision Basis for Reactors." This manual chapter provides guidance to the staff for determining the appropriate event response that was originally prescribed in MD 8.3, "NRC Incident Investigation Program." Although the product of this risk evaluation may provide useful risk insights to inspectors for event response or follow-up, it was not designed to determine the safety significance of a licensee's performance deficiency.

Because the SDP is used to estimate the risk significance of licensee performance deficiencies, including those that manifest themselves during events, the performance deficiencies associated with an actual reactor event should be dispositioned using the SDP in the same fashion as all other performance deficiencies.

0609-04 DEFINITIONS

04.01 Applicable definitions are located in IMC 0612-03, "Power Reactor Inspection Reports."

04.02 Inspection findings are assigned a color representing the significance of the finding. The following definitions (04.02.a thru 04.02.d) include the quantitative and qualitative aspects for each color and need to be applied appropriately to each SDP appendix listed at the end of this document. A graphical representation of the quantitative significance of findings is displayed in Exhibit 1.

a. Red (high safety or security significance) is quantitatively greater than 10^{-4} ΔCDF or 10^{-5} ΔLERF. Qualitatively, a Red significance indicates a decline in licensee performance that is associated with an unacceptable loss of safety margin. Sufficient safety margin still exists to prevent undue risk to public health and safety.

b. Yellow (substantial safety or security significance) is quantitatively greater than 10^{-5} and less than or equal to 10^{-4} ΔCDF or greater than 10^{-6} and less than or equal to

10^{-5} ΔLERF. Qualitatively, a Yellow significance indicates a decline in licensee performance that is still acceptable with cornerstone objectives met, but with significant reduction in safety margin.

c. White (low to moderate safety or security significance) is quantitatively greater than 10^{-6} and less than or equal to 10^{-5}ΔCDF or greater than 10^{-7} and less than or equal to 10^{-6} ΔLERF. Qualitatively, a White significance indicates an acceptable level of performance by the licensee, but outside the nominal risk range. Cornerstone objectives are met with minimal reduction in safety margin.

d. Green (very low safety or security significance) is quantitatively less than or equal to 10^{-6} ΔCDF or 10^{-7} ΔLERF. Qualitatively, a Green significance indicates that licensee performance is acceptable and cornerstone objectives are fully met with nominal risk and deviation.

04.03 Risk-Based Approach - A "risk-based" approach to regulatory decision-making is one in which such decision-making is solely based on the numerical results of a risk assessment. This approach places heavier reliance on risk assessment results than is currently practicable for reactors due to uncertainties in the PRA (i.e., model limitations and completeness and accuracy of data).

04.04 Risk-Informed Approach - A "risk-informed" approach to regulatory decision-making represents a philosophy whereby risk insights are considered together with other factors to establish requirements that better focus licensee and regulatory attention on design and operational issues commensurate with its importance to public health and safety.

0609-05 RESPONSIBILITIES AND AUTHORITIES

All NRC inspectors are required to assess the significance of inspection findings in accordance with the guidance provided in this Manual Chapter. General and specific responsibilities are listed below.

05.01 Director, Office of Nuclear Reactor Regulation (NRR).

a. Provide overall program direction for the ROP.

b. Develop and direct the implementation of policies, programs, and procedures for regional application of the SDP in the evaluation of findings and issues associated with the ROP.

c. Assess the effectiveness, uniformity, and completeness of regional implementation of the SDP.

05.02 Director, Office of Nuclear Security and Incident Response (NSIR).

a. Provide overall program direction for the security ROP.

b. Develop and direct the implementation of policies, programs, and procedures for regional application of the security SDP in the evaluation of findings and issues associated with the security ROP.

05.03 Director, Division of Inspection and Regional Support.

a. Approve all SDPs and direct the development of future SDPs and improvements through periodic revisions based on new risk insights and feedback from users.

b. Provide oversight and representatives as necessary to support the Significance and Enforcement Review Panel (SERP) in order to ensure consistent and timely application of the process.

05.04 Director, Division of Risk Assessment.

a. Recommends improvements to all SDPs using a probabilistic risk framework and authorizes changes to plant-specific risk insight information used by the SDP, based on new risk insights and feedback from users.

b. Provide oversight and representatives as necessary to support the SERP in order to ensure consistent and timely application of the process.

05.05 Director, Office of Enforcement.

a. Ensure consistent application of the enforcement process to violations of NRC regulations with the appropriate focus on the significance of the finding.

b. Provide representatives as necessary to support the SERP in order to ensure consistent application of the enforcement process.

c. Coordinate with NRR (and NSIR when necessary) when revising agency documents used for communicating to the licensee about apparent violations and final determinations associated with the ROP.

05.06 Director, Office of Research.

a. Provide support in the development and refinement of the SDPs, which use risk insights from research activities, based on user need requests.

b. Provide representatives, when requested, to support the SERP.

05.07 Regional Administrators.

a. Provide program direction for management and implementation of the SDP to activities performed by the Regional Office.

b. Maintain overall responsibility for, and apply regional resources as necessary, to determine the significance of specific inspection findings in a timely manner, using

best available information consistent with the SDP timeliness goal and associated SDP timeliness metrics.

05.08 Senior Reactor Analysts.

a. Support NRC objectives related to the utilization of risk insights in the reactor inspection program in the form of a risk-informed ROP, and in the use of the SDP.

b. Support the ROP and its specific objectives as presented in Attachment 3 to this Manual Chapter.

0609-06 BACKGROUND

SECY-99-007, dated January 8, 1999, described the need for a method of assigning a risk characterization to inspection findings. This risk characterization is necessary so that inspection findings can be aligned with risk-informed plant PIs during the plant performance assessment process.

SECY-99-007A, dated March 22, 1999, provided a set of draft cornerstone SDPs for the purpose of initiating a pilot program at nine reactor sites to evaluate the efficacy of the proposed revisions for risk-informing the reactor inspection program. Cornerstone SDPs that could not be related to core damage or containment failure risk used other rationale for assigning significance, as discussed in the respective appendices to this Manual Chapter.

SECY-00-49, dated February 24, 2000, provided the results of the pilot program for risk-informing the reactor inspection program and recommended proceeding with initial implementation of the new process at all licensed power reactor sites. The guidance in this Manual Chapter and related reactor inspection program guidance in IMC 2515 and IMC 2201 were subsequently issued in support of initial implementation. SRM-SECY 04-0020, "Treatment of Physical Protection Under the Reactor Oversight Program,", dated March 29, 2004, directs the staff to establish a separate but parallel oversight program for the security cornerstone. Enforcement associated with violations of regulatory requirements will continue to be processed in accordance with the current revision of the NRC Enforcement Policy, Enforcement Manual, and any applicable Enforcement Guidance Memoranda (EGMs). Minor violations, as defined by the enforcement policy, do not need to be reviewed using the SDP process.

0609-07 SDP DEVELOPMENT AND FEEDBACK PROCESS

07.01 SDP Development. The development of a new SDP or significant modification of an existing SDP should follow the general process used for original SDP development. This process should include the following general steps:

a. The draft of the SDP or the modification is subjected to internal NRC stakeholder review, including NRC regional input. Early external stakeholder input may also be solicited through public meetings, if appropriate.

b. A feasibility review is performed by the NRC staff to assess the adequacy of the proposed SDP or changes. This review should specifically involve regional representation and should test the SDP with real (preferred) or hypothetical inspection finding examples. This review should determine if the proposed SDP or change is ready to be issued for public comment and/or for initial evaluation through field use by regional inspectors.

c. Upon reconciliation of public comments and initial user feedback, the SDP or change is issued as a revision to this Manual Chapter.

d. Appropriate training will be provided to the NRC inspection staff.

07.02 SDP Feedback and Improvement. IMC 0801, "Reactor Oversight Process Feedback Program," describes in detail the feedback process and feedback form used by the Office of NRR/Division of Inspection and Regional Support, to document problems, concerns, or difficulties encountered during implementation of the NRC's ROP.

0609-08 SDP AND ENFORCEMENT REVIEW PANEL PROCEDURES

The following basic process is described in detail in Attachment 1 to this Manual Chapter.

08.01 Development of and Initial Characterization of Inspection Findings. All operating reactor inspection findings are generally discussed with licensee representatives during the inspection process and are formally presented at an exit meeting with licensee management at the conclusion of the inspection period. Initial significance determination is normally performed by the inspector using the Phase 1, "Initial Screening and Characterization" worksheet described in Attachment 4 to this Manual Chapter.

a. If the determination result is Green, then this would represent a final determination and will be characterized as Green at the exit meeting and in the inspection report.

b. If the inspector's determination result is potentially White, Yellow, Red, or greater than Green, then it will receive additional review(s) by the regional staff (described in Attachment 1) taking into account SDP timeliness goals as described in Section 08.05 of this Manual Chapter. The staff will use the best available information to determine the preliminary significance for each finding in parallel with the inspector developing the facts surrounding the finding.

Documentation of the finding, including details required to support the results of the SDP, will be performed in accordance with guidance provided in IMC 0612 – Inspection Reports. If the staff's significance determination of a finding is not complete at the time of issuance of the inspection report, and has not been reviewed by the Significance and Enforcement Review Panel (SERP), then the finding will be characterized in the inspection report as "to be determined (TBD)" as per the guidance in Attachment 1. No inspection finding should be characterized as a color other than Green in official NRC correspondence unless the SERP has reviewed it.

08.02 Preliminary Significance Review. Any finding with a potential significance of White, Yellow, Red, or greater than Green, will be reviewed by the SERP as described in Attachment 1 to this Manual Chapter. The result of the SERP review represents the staff's preliminary safety or security significance assessment. However, when a potential White, Yellow, or Red finding is determined to be Green by the SERP, this will represent a final determination and will be characterized as such in the inspection report.

08.03 Obtaining Licensee Perspectives on Preliminary Significance of a Finding. If the preliminary significance assessment of a finding is White, Yellow, Red, or greater than Green, then the licensee will be given the opportunity to formally present additional information or perspective at a public Regulatory Conference or in a written response on the docket. The opportunity for the licensee to request a public Regulatory Conference or provide a written response on the docket will be offered in the cover letter of the inspection report or in the Preliminary Significance Determination letter (refer to Attachment 1). The letter must clearly state, with sufficient detail, the staff's basis for its decision to enable the licensee to understand and provide further information to assist the staff in making the best informed final significance determination. The focus of the Regulatory Conference is to discuss the significance of the finding(s) and not necessarily the root causes or corrective actions associated with the finding(s). The licensee may present differing views on the staff's preliminary significance, present new facts, clarify existing information, and provide their evaluation of significance. Security-related matters will normally not be public, either at a conference or in correspondence.

The licensee is expected, but not required, to provide on the docket, at least seven days prior to the Regulatory Conference, any information considered applicable to the finding(s). The NRC staff must receive all additional information, which is to be considered for the finding, within a reasonable period of time (agreed upon between the licensee and the staff, and documented), in order to allow the staff adequate time to review the information. All written or electronic correspondence received from the licensee communicating their official response will be docketed. Any non-sensitive information provided by the licensee during the Regulatory Conference will be made public.

08.04 Finalization of the Staff's Significance Determination. If the licensee accepts the staff's preliminary significance determination in a written response, and does not intend to present additional information, then the staff will issue the final significance determination letter. If the licensee provides further information on the docket by mail or during a Regulatory Conference, then the staff that participated in the regulatory conference will decide in a post-conference review the merits of the information presented by the licensee and its impact on the final determination of the finding. If the staff, after consideration of the licensee's additional information, determines that the initial characterization of significance should not change, the staff will issue the final determination of significance; a final SERP is not required. If, after considering the licensee's additional information, the staff determines that a change in the initial characterization of significance is warranted or should be considered, then an additional SERP will scheduled to review the new information in accordance with the guidelines in Attachment 1 of this Manual Chapter. If the SERP, after considering the licensee's additional information, determines that a

preliminary White, Yellow, Red, or greater than Green finding is of Green significance, this is the final determination and may be communicated as such in a letter or in the cover letter of the next quarterly inspection report.

In the case where the staff has issued a preliminary significance determination of greater than Green and the licensee has not or cannot provide sufficient information to better inform the staff's significance determination in a reasonable period of time, then the staff should determine final significance using its best objective rationale, and document this rationale fully in a letter to the licensee. This is expected to be rare and should conform to all SDP procedural requirements.

When the SERP agrees on the final determination of significance, the licensee will be informed of the final color of the finding in a final significance determination letter. Enforcement actions stemming from the finding, if applicable, will generally be forwarded at that time, and the licensee will be informed of the SDP appeal process described in Attachment 2 of this Manual Chapter.

08.05 SDP Timeliness. The Agency's goal for SDP timeliness is that all final significance determinations be completed within 90 days from the issue date of the first official correspondence that described the finding or documented the need for further review to determine significance (TBD). All attempts should be made to meet this goal, however, it is recognized that certain issues, due to their complexity, may result in occasions where the goal is exceeded. The NRR Operating Plan and Regional Operating Plans are Agency management tools for monitoring staff performance in achieving the goal.

The timeliness criteria below represent the maximum time approximated for each process milestone in order for the Agency to meet the 90 day goal.

T_0 - The issue date of the first official correspondence describing the finding, either in an inspection report and/or preliminary significance determination letter

T_{30} - Latest date to issue the preliminary significance determination letter

T_{70} - Latest date for completing the Regulatory Conference with licensee (materials to be presented by licensee should be received by the staff seven days prior to the meeting)

T_{85} - Latest date to complete final SERP

T_{87} - Latest date to issue Enforcement Notification (EN) to the Commission

T_{90} - Final Determination letter issued

The Agency successfully completing the SDP process within 90 days is dependent upon timely completion of a public Regulatory Conference or review of a written response. The timeliness criterion below represents the maximum time approximated for each process milestone for the licensee to establish the Regulatory Conference within the 90-day goal. This timeliness goal is developed in detail in Attachment 1 to this Manual Chapter.

T_{L0} - Issue date of the preliminary significance determination letter issued in an inspection report cover letter or separate correspondence

T_{L10} - Licensee informs the NRC within 10 days from the issue date of the notification of the preliminary significance determination, by phone or other means, of its intent to request a regulatory conference, to respond with a written submittal, or to decline the opportunity to provide its perspective. If the licensee declines this opportunity, it must also submit written correspondence stating its intent.

T_{L33} - Licensee submits materials to be presented at the Regulatory Conference

T_{L40} - Regulatory Conference completed or licensee's written response received by NRC no later than 40 days from the issue date of the preliminary significance determination letter. NOTE: The NRC must receive all additional information that was under development at the time of the Regulatory Conference, if it is to be considered for the finding, within a reasonable period of time (agreed upon between the licensee and the staff, and documented), in order to allow the staff adequate time to review the information.

Exceptions to the Timeliness Goal.

a. Findings of a final Green significance will not negatively impact the timeliness of the NRC's regulatory response. As such, these findings are not subject to the timeliness goal and associated SDP timeliness metrics, and may be communicated outside the 90-day timeliness period in a letter or in the cover letter of the next quarterly inspection report. The sponsor of the finding should verbally communicate the final results to the licensee if there is a significant delay in issuing the next report.

b. Experience has shown that inspection findings that may take longer than the 90 day goal to assess for significance meet one or more of the following criteria:

1. Findings are of such technical complexity that existing SDP evaluation tools are not readily adaptable to the issue.

2. The region does not have the expertise or resources to risk inform the finding.

3. Findings have potentially high safety significance (i.e., Yellow or Red) that should be carefully examined for potential impact on plant safety and subsequent NRC action.

In these cases, additional time may be necessary to complete a preliminary and/or a final determination of safety significance. However, findings for which the 90-day goal is not met, including findings where the limit was extended, will continue to negatively impact the timeliness goal and associated SDP timeliness metrics.

c. Some findings may involve a formal Office of Investigation (OI) or Department of Justice (DOJ) investigation. When an inspection finding involves a formal OI/DOJ investigation and it is known that the results of the investigation will not impact further evaluation of the finding's significance and/or follow-up inspection, then the finding should be resolved per the normal SDP process. If the OI/DOJ investigation does impact the timely resolution of the finding, then the guidance for a planning SERP should be implemented.

08.06 Planning SERP. For findings considered by the Region to meet the criteria of Section 08.05a, a Planning SERP, convened early in the process, will reach consensus on the scope of evaluation to be performed, the schedule on which the evaluation will be completed, and who will perform the evaluation. Also, if the region determines that an existing SDP is not suitable to assess the significance of a finding and is considering use of Appendix M, the decision to apply Appendix M should be evaluated at a Planning SERP. This evaluation does not apply to findings where the Phase 1 SDP guidance has directed the use of Appendix M. The Planning SERP is convened at the discretion of the applicable regional sponsor of the finding with cooperation of the HQ staff. The members of the Planning SERP are the same as those of a routine SERP, as described in IMC 0609 Attachment 1, Significance and Enforcement Determination Review Panel Process. Guidelines for conducting a Planning SERP are detailed in Exhibit 3 of IMC 0609 Attachment 1.

Before presenting to the Planning SERP, the regional sponsor should coordinate with HQ staff on determining the scope for the evaluation (e.g., Phase 2 SDP, Appendix M, simplified Phase 3, or detailed Phase 3 SDP), the need for additional information and expertise (subject matter experts from other Divisions in NRR or other regions), and the estimated time necessary to obtain an acceptable risk- ML101400479informed preliminary finding.

It is expected that no assessments will be delayed beyond 90 days. However, if the SERP agrees that specific circumstances will delay the final characterization beyond 90 days, the Regional Administrator and the NRR Office Director must be notified. If the Planning SERP reaches consensus that additional time is warranted beyond 90 days, a schedule must be developed for the key milestones above. Findings requiring greater than the 90 day goal will continue to have a negative impact on the SDP timeliness metrics.

0609-09 PROCESS FOR LICENSEE APPEAL OF A STAFF SDP DETERMINATION

If a licensee disagrees with the staff's final determination of significance, the licensee may appeal the determination to the appropriate NRC Regional Administrator as described in Attachment 2 of this Manual Chapter. Any such review must meet the requirements stated in the Prerequisites and Limitations sections of Attachment 2 to merit further staff consideration. Specifically, the licensee must have opted for an opportunity to present additional information to the staff either by meeting with regional management at a Regulatory Conference or by submitting a written response on the docket.

0609-10 USING THE SDP TO DETERMINE THE SIGNIFICANCE OF INSPECTION FINDINGS THAT ARE NOT VIOLATIONS OF THE LICENSING OR DESIGN BASIS

The staff's use of the SDP to determine the significance of the result or consequence of a licensee performance deficiency will be made regardless of whether the result or consequence constitutes a violation of a licensee's licensing or design basis or any other regulatory requirement or commitment. Agency follow-up of such findings, if determined to be significant, will be handled in accordance with the backfit rules of 10 CFR 50.109 as appropriate.

END

Exhibits:

Exhibit 1 - Graphical Representation of the Quantitative Significance of Findings

Attachments:

Attachment 1 - Significance and Enforcement Review Panel Process

Attachment 2 - Process for Appealing NRC Characterization of Inspection Findings (SDP Appeal Process)

Attachment 3 - Senior Reactor Analyst Support Objectives

Attachment 4 - SDP Phase 1 - Initial Screening and Characterization of Findings

Appendices:

Appendix A Significance Determination of Reactor Inspection Findings for At-Power Situations

- Attachment 1 User Guidance
- Attachment 2 Site Specific Risk-Informed Inspection Notebooks Usage Rules
- Attachment 3 User Guidance for Screening of External Events Risk Contributions

Appendix B Emergency Preparedness SDP

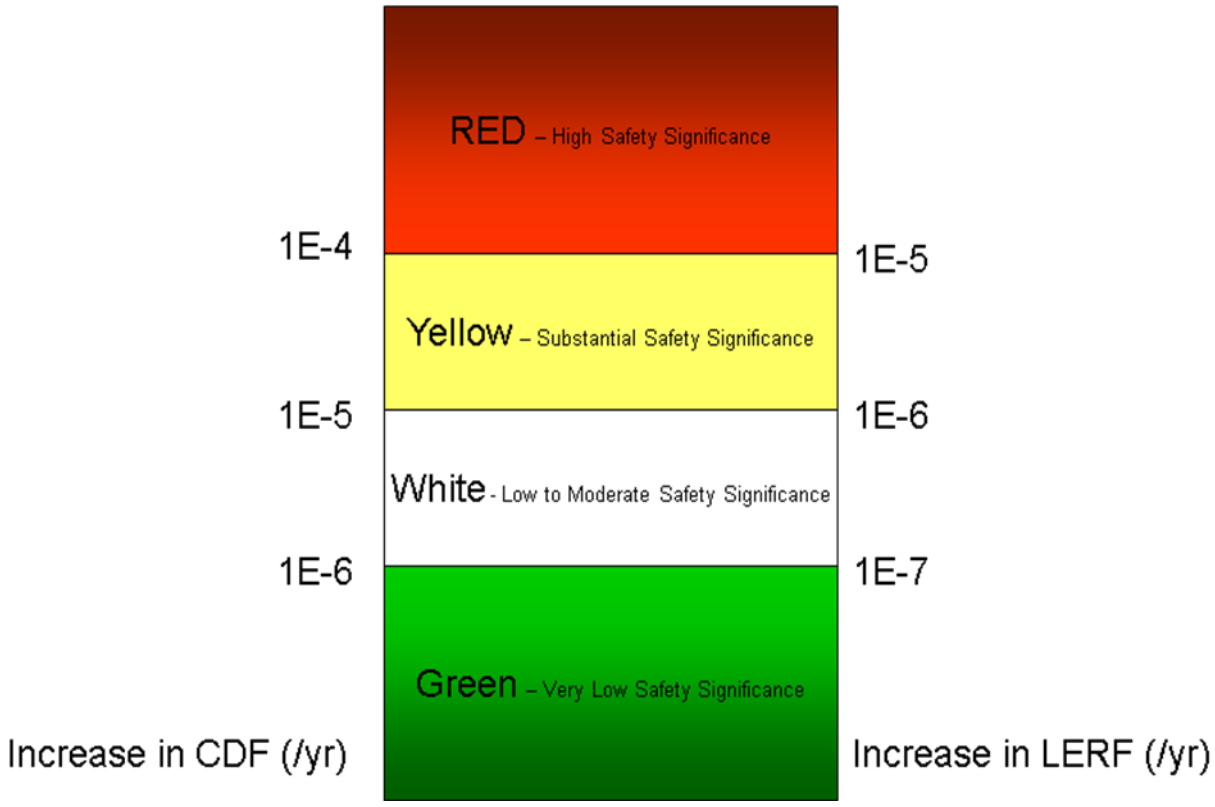
Appendix C Occupational Radiation Safety SDP

Appendix D	Public Radiation Safety SDP
Appendix E	Part I, Baseline Security SDP for Power Reactors and Part II, Force-on-Force Security SDP for Power Reactors
Appendix F	Fire Protection and Post-Fire Safe Shutdown SDP
Appendix G	Shutdown Safety SDP
Appendix H	Containment Integrity SDP
Appendix I	Operator Requalification, Human Performance
Appendix J	Steam Generator Tube Integrity SDP
Appendix K	Maintenance Risk Assessment and Risk Management SDP
Appendix L	Significance Determination Process for B.5.b
Appendix M	Significance Determination Process Using Qualitative Attributes

Exhibit 1

Graphical Representation of the Quantitative Significance of Findings

NOTE: Not applicable to all safety cornerstones and IMC 0609 appendices



Attachment 1

Revision History - IMC 0609

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	10/13/2006	Revision history reviewed for the last four years	NO	N/A	N/A
N/A	04/21/2000 CN 00-007	This manual chapter supports the New Reactor Oversight Program for significant determination of findings. The significance determination process detailed in the manual chapter is designed to characterize the significance of inspection findings for the NRC licensee performance assessment process using risk insights, as appropriate.	NO	N/A	N/A
N/A	02/27/2001 CN 01-005	0609 has been revised to correct minor errors and inconsistencies, and to clarify the overall SDP description.	NO	N/A	N/A
N/A	08/16/2001 CN 01-015	0609 has been revised to correct the title of Attachment 2 (0609.02) as listed in the attachments to this manual chapter.	NO	N/A	N/A
N/A	04/30/2002 CN 02-022	0609 has been revised to reflect revisions to Attachments 1 and 2, and changes to the recently issued Appendix A to IMC 0609.	NO	N/A	N/A

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	05/19/2005 CN 05-014	0609 is revised to add Appendix K, "Maintenance Rule Risk Assessment and Risk Management" as an attachment.	NO	N/A	N/A
NA	11/22/05 CN 02-030	0609 has been revised to reflect a concerted effort to provide guidance which will help meet the Commission's guidance on the timeliness for finalizing the significant determination of inspection findings. The revision includes the regional comments on the proposed guidance on how to meet the timeliness goal. The document continues to emphasize the importance of timely issuance of the final SDP result. However, complexity of issues, lack of evaluation tools, lack of expertise, and findings of high safety significance can contribute to delays in finalizing findings. To that affect, new guidance is provided in Section 08.05 of the document on how to approach such findings using the Planning SERP process.	NO	N/A	ML061590493

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	01/10/08 CN 08-002	This revision provides the staff clarification to use IMC 0309, “Reactive Inspection Decision Basis for Reactors” in place of MD-8.3, to use Attachment 4 to perform SDP Phase 1 screenings, to incorporate feedback responses to add NSIR requirements, clarify guidance for SDP timeliness in regard to OI/DOJ investigations, and to add references to SDP Appendix M and the Attachment 4 for Phase 1 Initial Screening and Characterization attachment.	NO	N/A	ML073460588
N/A	08/05/08 CN 08-023	This revision changes the term “choice” letter to “preliminary significance determination” letter and adds a third responsibility to OE in Section 05.05. The section on SDP Timeliness was clarified to eliminate literal interpretation of timeliness goals by the licensee. Replaced term AV(TBD) with (TBD) due to changes in IMC0612. Repetitive guidance that appears in both this IMC and Attachment 1 was removed and is in Attachment 1 only.	NO	N/A	ML081720377

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	ML101400479 06/02/11 CN 11-009	This revision adds the new SDP Appendix L to list of SDP attachments, provides definitions for risk-based, risk-informed, and of the four color significance levels. A new Exhibit 1 was added that graphically describes the SDP. The IMC is better aligned with Attachment 1 – SERP, to remove redundancy. General clarifications of the guidance including receipt of additional information from the licensee within a reasonable period of time agreed upon between the staff and licensee. Clarifications were made that findings that originally SERP had reviewed as potential White, Yellow, Red, or > Green issues, then resulted in a final Green significance will not be counted in the timeliness goal. The IMC will reflect that the region be allowed to communicate the final result of these findings in the cover letter of the following quarterly inspection report or by separate letter. (ROPFF 0609-1480).	NO	N/A	ML103490485