

NRC INSPECTION MANUAL

IRIB

MANUAL CHAPTER 0612

POWER REACTOR INSPECTION REPORTS

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0612-01 PURPOSE

- 01.01 To define the content and format of power reactor inspection reports.
- 01.02 To provide guidance for inspection issue screening and direction for documenting power reactor inspections and findings.
- 01.03 To ensure that all violations of Nuclear Regulatory Commission (NRC) requirements by power reactor licensees are appropriately dispositioned in accordance with the NRC Enforcement Policy. This includes traditional enforcement violations which cannot be addressed only through the Reactor Oversight Process (ROP).

0612-02 OBJECTIVES

- 02.01 To screen inspection results to determine if issues warrant documentation in inspection reports.
- 02.02 To ensure inspection reports clearly communicate significant inspection results in a consistent manner to licensees, Nuclear Regulatory Commission (NRC) staff, and, where applicable, the public.
- 02.03 To document the basis for significance determination and enforcement action.
- 02.04 To provide inspection results as input into the Operating Reactor Assessment Program (Inspection Manual Chapter (IMC) 0305) of the ROP.

0612-03 DEFINITIONS

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

- 03.01 Apparent Violation. A non-compliance with a regulatory requirement for which an enforcement decision has not been reached. This definition is used to characterize (a) non-compliances associated with ROP findings having pending or preliminary significance, (b) Severity Level III or higher violations being considered for escalated enforcement action, or (c) violations being considered for enforcement discretion.
- 03.02 Cross-Cutting Aspect. Refer to IMC 0310 for the definition.
- 03.03 Finding. A performance deficiency of More-than-Minor significance. A finding may or may not result in a violation.
- 03.04 Issue of Concern. A well-defined observation or collection of observations that may have a bearing on safety or security which may warrant further inspection, screening, evaluation, or regulatory action.

03.05 Licensee-Identified. For the purpose of this IMC, 'licensee-identified' findings or violations are those that are neither NRC-identified nor self-revealing. Most, but not all, licensee-identified findings or violations are discovered through a licensee program or process. Examples of licensee programs that may result in such findings or violations are post maintenance testing, surveillance testing, drills, critiques, or audits conducted by or for the licensee. Other examples of licensee-identified findings or violations are those that are identified by the licensee as a result of their deliberate and focused observation during the course of performing their normal duties.

03.06 Minor Violation. A violation associated with a minor performance deficiency or that is less than Severity Level IV. Minor violations do not warrant enforcement action and are not normally documented in inspection reports.

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

03.08 Notice of Deviation. A written notice describing a licensee's failure to satisfy a commitment, such as a commitment to conform to the provisions of applicable codes, standards, guides, or accepted industry practices when the commitment, code, standard, guide, or practice involved has not been made a requirement by the Commission.

03.09 Notice of Violation (NOV). A written notice setting forth one or more violations of a legally binding requirement.

03.10 NRC-Identified. Findings or violations found by NRC inspectors, of which the licensee was not previously aware or had not been previously documented in the licensee's corrective action program. NRC-identified findings or violations also include issues initially identified by the licensee to which the inspector has identified a previously unknown weakness in the licensee's classification, evaluation, or corrective actions associated with the licensee's correction of a finding or violation (i.e., NRC added value).

03.11 Observation. A factual detail noted during an inspection.

03.12 Pending Significance. A significance characterization assigned to a finding which requires further safety or security significance evaluation to determine a preliminary significance.

03.13 Performance Deficiency. An issue that is the result of a licensee not meeting a requirement or **self-imposed** standard where the cause was reasonably within the licensee's ability to foresee and correct, and therefore should have been prevented.

03.14 Preliminary Significance. A significance characterization assigned to a finding that has received a preliminary significance determination from the Significance Enforcement Review Panel (SERP) and was determined to be preliminarily White, Yellow, Red, or Greater than Green.

03.15 Present Performance. The performance characteristic associated with the potential cross-cutting aspect is reflective of present performance if the performance deficiency (not the event or condition resulting from the performance deficiency) is recent (i.e., nominally within the last three years.) In some rare or unusual cases, other considerations can be applied to determine if the cross-cutting aspect is reflective of present performance.

- If the performance deficiency occurred more than three years ago, but the performance characteristic has not been corrected or eliminated, the inspector can conclude that the cross-cutting aspect is reflective of present performance.
- If the performance deficiency occurred within the last three years, but the performance characteristic has **since** been corrected or eliminated, the inspector can conclude that the cross-cutting aspect is not reflective of present performance.

Note: Corrected or eliminated means that the performance deficiency would not likely occur today under similar circumstances. In performing this evaluation, inspectors should consider both changes made to establish licensee programs and processes since the performance deficiency occurred and any recent examples of improved performance.

03.16 Requirement. A legally binding obligation such as a statute, regulation, license condition, technical specification, or order that is enforceable by the NRC.

03.17 Standard or Self-Imposed Standard. A standard is a licensee-established expectation that does not constitute a requirement, as defined above.

03.18 Self-Revealing. Self-revealing findings or violations are those developed from issues that become self-evident and require no active and deliberate observation by the licensee or NRC inspectors to determine whether a change in process or equipment capability or function has occurred. Self-revealing issues become readily apparent to either NRC or licensee personnel through a readily detectable degradation in the material condition, capability, or functionality of equipment or plant operations and require minimal analysis to detect.

Examples of self-revealing findings and violations include those revealed through: reactor trips and secondary plant transients; failure of emergency equipment to operate; obvious failures of fluid piping or plant equipment; identification of large quantities of water in areas where one would not normally expect such a condition; and non-compliance with high radiation area requirements that, in some cases, was identified through an electronic dosimeter alarm.

03.19 Sensitive Unclassified Non-Safeguards Information (SUNSI). Any information of which the loss, misuse, modification, or unauthorized access can reasonably be foreseen to harm the public interest, the commercial or financial interests of the entity or individual to whom the information pertains, the conduct of NRC and Federal programs, or the personal privacy of individuals.

03.20 Severity Level. The significance of a violation evaluated under traditional enforcement.

03.21 Significance Determination Process (SDP). The process described in IMC 0609 and associated appendices that is applied to an inspection finding to determine its safety or security significance as either Green (very low), White (low-to-moderate), Yellow (substantial), or Red (high).

03.22 To Be Determined (TBD). A significance characterization assigned to a finding with pending or preliminary significance. The TBD characterization will apply until the final significance is documented in an inspection report or final determination letter.

03.23 Traditional Enforcement. An Enforcement Policy process used to disposition violations of NRC requirements that are not dispositioned through the ROP SDP. Violations receiving traditional enforcement are assigned a Severity Level and may include the imposition of a civil penalty as appropriate. Traditional enforcement is applied to violations associated with (a) actual consequences, (b) willfulness, and (c) impeding the regulatory process. Additionally traditional enforcement is used to disposition violations receiving enforcement discretion or violations without a performance deficiency. Independent spent fuel storage installations (ISFSI), and nuclear materials facilities are not subject to the SDP and, thus, traditional enforcement will be used for these facilities.

03.24 Unresolved Item (URI). An issue of concern about which more information is required to determine (a) if a performance deficiency exists, (b) if the performance deficiency is More-than-Minor, or (c) if the issue of concern constitutes a violation. Such a matter may require additional information from the licensee or cannot be resolved without additional guidance, or clarification/interpretation of the existing guidance.

03.25 Violation. The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, technical specification.

0612-04 RESPONSIBILITIES AND AUTHORITIES

04.01 General Responsibilities. Each inspection of a reactor facility must be documented in a report consisting of a cover letter, a cover page, a summary, inspection details, and supplemental information.

04.02 Inspectors

- a. Must prepare power reactor inspection reports in accordance with the guidance provided in this IMC.
- b. Must ensure that inspection results are properly characterized, accurately reported, and that referenced material is correctly documented.
- c. Must ensure that the content of the inspection report does not conflict with the **most recent** information presented at the exit **or re-exit** meetings.

04.03 Branch Chiefs and Division Directors

- a. A supervisor or manager familiar with NRC requirements in the inspected area must review each inspection report to ensure it is in accordance with the guidance provided in this IMC.

- b. A supervisor or manager must ensure that inspection findings are consistent with NRC policies and technical requirements, and ensure that violations are addressed in accordance with the Enforcement Policy and the Enforcement Manual.
- c. A supervisor or manager must ensure that screening and significance determinations made in the inspection report are in accordance with Appendix B, "Issue Screening," of this IMC, IMC 0609, "Significance Determination Process," and the Enforcement Policy, as applicable.
- d. A supervisor or manager must ensure the content, tone, overall regulatory focus, and timeliness of inspection reports are appropriate and meet expectations.

04.04 Division of Inspection and Regional Support. The Reactor Inspection Branch is responsible for providing interpretations of the information contained in this IMC, for answering questions related to the guidance, and for providing guidance for situations not covered in this IMC.

0612-05 SCREENING INSPECTION RESULTS

The screening of inspection results is addressed in Appendix B of this IMC.

0612-06 DOCUMENTING FINDINGS USING THE FOUR-PART FORMAT

This section provides instructions for documenting findings associated with violations that do not receive traditional enforcement, and with unresolved items for which the existence of a violation has not yet been determined. It also provides instructions for documenting findings with no associated violation.

These findings are documented using the four-part format. The four-part format is organized as follows:

- Introduction
- Description
- Analysis
- Enforcement

06.01 Introduction. The introduction should be one or two sentences that provide a brief discussion of the finding. This section does not need to stand alone because the description that follows will provide the supporting details. The introduction must include:

- a. The performance deficiency
- b. The significance color
- c. The identification credit (self-revealing, NRC-identified, or licensee-identified)

- d. For violations, the requirement violated and whether it is being cited (NOV) or non-cited (NCV)

06.02 Description. The description must describe the circumstances associated with the finding and/or violation and include the supporting factual information that will be used to support the justifications used in the analysis and enforcement section determinations. Additionally, if the finding or violation was determined to be NRC-identified because the inspector identified a previously unknown weakness in the licensee's classification, evaluation, or corrective actions, the description should provide evidence that the licensee had identified the issue and had failed to properly classify, evaluate, and/or correct the problem. The description must include sufficient detail to enable a knowledgeable reader to understand the actual or potential safety, security, or regulatory consequence/importance. Most findings based on relatively simple circumstances can be described in less than one page and should rarely exceed two pages. Findings based on more-complex circumstances may merit more discussion.

06.03 Analysis. The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusion.

- a. The first part must include the following:
 - 1. A concise restatement of the performance deficiency. Identify the requirement or standard that was not met and how the licensee failed to meet it.
 - 2. The applicable More-than-Minor screening question found in IMC 0612 Appendix B and the reason why that question was answered "yes" for this finding.
- b. The second part must describe the logic used to determine the significance of the finding. Include appropriate references to IMC 0609 including the title of appendices and attachments, and the issue date.

If the significance has been determined, then characterize the finding as described below. However, for those findings with pending significance (i.e., neither the SERP nor Senior Reactor Analysts have determined the significance characterization), state that the finding could not be screened to Green and is pending a significance determination, and then characterize the finding as described in items 1(a), 2(a), 4(a), 4(b), and 4(d) below. After completion of the significance characterization, complete the characterization of the finding by documenting the remaining items below in a subsequent inspection report or cover letter.

- 1. For all SDP results describe:
 - (a) The affected cornerstone as determined by IMC 0609, Attachment 4
 - (b) The SDP Appendix used in the determination, as applicable
 - (c) The assumptions used in the determination, as applicable (these assumptions may be referenced and described in the report attachment)
 - (d) The resulting color

2. Additionally, for risk-informed SDP (e.g., IMC 0609 Appendix A, F, G, H, K) results describe:
 - (a) The screening question criteria that was satisfied that caused the finding to be assessed as Green (e.g., The screening question criteria from IMC 0609, App A) or the screening question criteria that was satisfied that caused the finding to be assessed further in a more detailed risk evaluation or analysis (e.g., phase 2 and/or phase 3).
 - (b) For a detailed risk evaluation or analysis (e.g., phase 2 or 3 evaluation) that results in a Green characterization, include the most dominant core damage sequences, including any remaining mitigation capability and/or recovery credit that limited the significance, and the exposure time.
 - (c) For a detailed risk evaluation or analysis (e.g., phase 3 evaluation) that results in a greater than Green characterization, include the most dominant core damage sequences, including any mitigation capability and/or recovery credit that affected the significance, and the exposure time.
 3. Additionally, for deterministic SDP (e.g., IMC 0609 Appendix B, C, D, E, I, J, L, M) results describe:
 - (a) The table or flowchart used
 - (b) The path on the flowchart used to arrive at the conclusion, as applicable
 4. Additionally, for all pending or preliminarily significance characterizations discuss the following:
 - (a) Why the finding does not present an immediate safety or security concern
 - (b) The compensatory measures in place while licensee long-term corrective measures are being implemented, if applicable
 - (c) For findings with preliminarily significance, include the risk characterization or other basis as determined by the SERP.
 - (d) State that the significance is “To Be Determined” (TBD). Emphasize that the safety characterization is not yet finalized. Do not make direct statements regarding safety significance in the inspection report when the agency has not yet reached a conclusion.
- c. The third part of the analysis section for a finding should include the basis for assigning or not assigning the cross-cutting aspect, per IMC 0612 Appendix B. Specifically:
1. For each finding to which a cross-cutting aspect is assigned:

- (a) For those licensee-Identified findings with pending or preliminary significance, state that the assigned cross-cutting aspect is conditional on the final significance determination being White, Yellow, or Red.
- (b) Identify which cross-cutting aspect described in IMC 0310 that best corresponds to the apparent cause or most significant causal factor of the performance deficiency.
- (c) Explain why the cross-cutting aspect was assigned.
- (d) If assigning a cross-cutting aspect to a finding that occurred outside of the nominal three-year period for “present performance,” explain why the identified apparent cause or most significant causal factor represents present licensee performance.
- (e) Provide the alpha-numeric identifier associated with the selected cross-cutting aspect listed in IMC 0310.

2. If the finding does not have a cross-cutting aspect, then the analysis section must include a statement briefly describing the reason for not assigning a cross-cutting aspect.

06.04 Enforcement. Findings that involve violations of regulatory requirements are documented in accordance with the Enforcement Policy and the guidance provided below.

In addition, 10 CFR 50, Appendix B, Criterion XVI violations for failure to ‘preclude repetition’ can only be written for significant conditions adverse to quality. For such violations, the inspection report details must clearly address:

- The basis for determining the previous condition was a significant condition adverse to quality as defined in the licensee's corrective action program,
- The relationship between the previous significant condition adverse to quality and the current one, and
- The corrective actions from the previous significant condition adverse to quality that failed to prevent recurrence.

Document the enforcement attributes of the finding and/or violation as described below:

- a. For a finding without an associated violation, the enforcement section must include a statement similar to: “This finding does not involve enforcement action because no violation of a regulatory requirement was identified”, and one of the following statements:
 1. If the finding is Green, “Because this finding does not involve a violation and is of very low safety or security significance, it is identified as a FIN [Tracking Number], Title”

2. If the finding has pending or preliminary significance, “Because this finding does not involve a violation and because the significance determination of a finding is not complete (to be determined), it is identified as FIN (TBD) [Tracking Number], Title”
- b. The enforcement section must include the following for violations which do not receive enforcement discretion (except as noted below):
1. What requirement was violated and how it was violated (this requires a “contrary to” statement consistent with guidance in the Enforcement Manual, using language that is parallel to that of the requirement).
 2. When the violation occurred and how long it existed (Use bracketing dates or date and duration. Reflect when estimated or ongoing at time of exit).
 3. Any actual or potential safety consequence.
 4. Immediate corrective actions taken to restore compliance. If the planned corrective action is still being evaluated, a sentence stating why continued non-compliance does not present an immediate safety or security concern. If an NOV is being used to disposition a violation normally dispositioned as a NCV (e.g., Green finding), additionally describe the circumstances in accordance with Section 2.3.2 of the Enforcement Policy.
 5. A reference to any established licensee’s corrective action document number.
 6. Specific enforcement actions.
 7. Tracking number and title resulting from the violation (e.g., NCV or NOV [Tracking Number], Title).
 8. A statement similar to:
 - (a) For NCVs: “This violation is being treated as an NCV, consistent with Section 2.3.2 of the Enforcement Policy. **The violation** was entered into the licensee’s corrective action program as [###]. (NCV 05000XXX/201X0XX-XX; 05000XXX/201X0XX-XX, [title])”
 - (b) For NOVs: “This is a violation of [requirement]. A Notice of Violation is attached.” Also, for NOVs, see the Enforcement Manual for guidance on developing the notice and cover letter.

0612-07 DOCUMENTING TRADITIONAL ENFORCEMENT VIOLATIONS USING THE FOUR-PART FORMAT

This section provides instructions for documenting traditional enforcement violations without an associated finding.

Violations for which enforcement discretion has been granted will normally be documented using the four-part format under the applicable inspectable area. However, when discretion is granted in accordance with an Enforcement Guidance Memorandum, the Enforcement Guidance Memorandum should be consulted for additional guidance which could direct deviation from the four-part format.

07.01 Introduction. The introduction should be one or two sentences that provide a brief discussion of the violation. This section does not need to stand alone because the description that follows will provide the supporting details. The introduction must include:

- a. The Severity Level
- b. The identification credit (self-revealing, NRC-identified, or licensee-identified)
- c. The requirement violated and whether it is being cited (NOV) or non-cited (NCV)

07.02 Description. Refer to Section 06.02 for specific guidance.

07.03 Analysis. The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusion.

- a. The first part of the analysis section must include the following:
 1. The requirement violated
 2. The applicable traditional enforcement attribute (i.e. willfulness, impacting regulatory process, or actual consequence)
- b. The second part of the analysis section must describe the logic used to determine the Severity Level of the violation and, if applicable, the civil penalty. Include reference to Enforcement Policy examples, as applicable.
- c. The third part of the analysis section must indicate that cross-cutting aspects are not assigned to traditional enforcement violations.

07.04 Enforcement. Refer to Section 06.04b for specific guidance. Also note that conclusions about the willfulness of a violation are agency decisions and are normally not made until after the Office of Investigations has completed an investigation. A premature or inaccurate discussion of the willfulness of a violation in an inspection report could result in later conflict based on additional input and review. Do not speculate or draw conclusions about the intent behind a violation. Inspection reports that include potentially willful violations or that contain material that may be related to an ongoing investigation must be reviewed by the Office of Investigations and the Office of Enforcement prior to issuance.

For a violation in which enforcement discretion is applied, work with the Office of Enforcement through the Regional Enforcement Coordinator to develop appropriate wording for the Enforcement Section. See the Enforcement Manual for standard paragraphs to be included.

0612-08 DOCUMENTING TRADITIONAL ENFORCEMENT VIOLATIONS AND ASSOCIATED FINDINGS USING A COMBINED FOUR-PART FORMAT

This section provides instructions for documenting traditional enforcement violations with an associated finding in a combined four-part write-up. The combined write-up should be used to document findings and traditional enforcement violations associated with a common performance deficiency when both are to be dispositioned in the same report.

08.01 Introduction. The introduction should be one or two sentences that provide a brief discussion of the associated finding and traditional enforcement violation. This section does not need to stand alone because the description that follows will provide the supporting details. The introduction must include:

- a. The performance deficiency
- b. The significance color of the finding
- c. The Severity Level of the violation
- d. The identification credit (self-revealing, NRC-identified, or licensee-identified)
- e. The requirement violated and whether or not it is being cited (NOV) or non-cited (NCV)

08.02 Description. Refer to Section 06.02 for specific guidance.

08.03 Analysis. The analysis section will discuss screening of both the finding and traditional enforcement violation. The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at the final conclusions.

- a. The first part of the analysis will include:
 1. The basis for the finding. Refer to Section 06.03a for specific guidance.
 2. The basis for the traditional enforcement violation. Refer to Section 07.03a for specific guidance. A restatement of the requirement violated is not required if included in the basis for the finding.
 3. Discussion of why the issue was screened through both the traditional enforcement and ROP processes. A statement similar to the following can be used “This violation is associated with a finding that has been evaluated by the SDP and communicated with an SDP color reflective of the [safety or security] impact of the deficient licensee performance. The SDP, however, does not specifically consider [willfulness, the regulatory process impact, or actual consequences]. Thus, although related to a common regulatory concern, it is necessary to address the violation and finding using different processes to correctly reflect both the regulatory importance of the violation and the [safety or security] significance of the associated finding”.
- b. The second part of the analysis will include:

1. The logic used to determine the significance of the finding. Refer to Section 06.03b for specific guidance.
 2. The logic used to determine the Severity Level of the violation. Refer to Section 07.03b for specific guidance.
- c. The third part of the analysis will include the basis for assigning or not assigning a cross-cutting aspect to a finding. Refer to Section 06.03c for specific guidance.

08.04 Enforcement. Describe any applicable enforcement action. Refer to Section 06.04b for specific guidance.

0612-09 VIOLATIONS WITHOUT PERFORMANCE DEFICIENCIES

Violations without a performance deficiency are dispositioned using traditional enforcement and may warrant enforcement discretion.

Work with the Office of Enforcement through the Regional Enforcement Coordinator to determine the appropriate action. Also, see Chapter 5 of the Enforcement Manual for additional guidance. Consider the following two-part format for such violations:

The first part should describe:

- The issue of concern
- Why there was no performance deficiency
- **The apparent safety or security significance. A detailed SDP analysis is not required.**

Assuming the agency exercises enforcement discretion, the second part **should** describe the requirement violated, the licensee's corrective action document number(s), **and the decision logic, considerations, and conclusions supporting the determination as described in the Enforcement Manual.**

Violations without performance deficiencies which receive enforcement discretion are not assigned an ROP tracking number and are not documented in the Summary. The cover letter must contain the required language used for exercising enforcement discretion. Refer to Section 16.01, "Cover Letter," of this IMC and Section 5.2 of the NRC Enforcement Manual for additional guidance.

0612-10 UNRESOLVED ITEMS

10.01 Opening. An inspector should open an unresolved item when an issue of concern is identified but more information is required to determine one or more of the following:

- If there is a performance deficiency
- If the performance deficiency is More-than-Minor
- If the issue of concern constitutes a violation

An unresolved item cannot be used to determine the significance of a finding, to track completion of licensee's actions associated with a finding or an inspection question, or to determine if enforcement discretion should be granted for a violation. The action of documenting an unresolved item is a commitment of future resources.

The unresolved item should be documented using the introduction and description sections discussed in Section 0612-06, "Documenting Findings Using the Four-Part Format." Because unresolved items are not findings, the analysis and enforcement sections are not required. The introduction section should clearly state that an unresolved item was identified. The description section should describe the issue with sufficient detail to allow another inspector to complete the inspection effort, if necessary. The report must clearly identify the specific licensee or NRC actions needed to resolve the issue. Include a tracking number for the unresolved item in accordance with Section 0612-16 "Compiling an Inspection Report."

Do not document unresolved items in the summary section or in the inspection report cover letter.

10.02 Follow-up and Closure. The level of detail devoted to closing unresolved items depends on the nature and significance of the additional information identified. Documentation of the closure of an unresolved item must include a summary of the topic and the inspector's follow-up actions, evaluation of the adequacy of any licensee actions, and determination of whether a violation or finding has occurred. Sufficient detail must be provided to justify closing the item. If resolution to an unresolved item was based on discussions between inspector(s) and Nuclear Reactor Regulation (NRR) technical staff, concisely document the details of these discussions as the basis for the regulatory decision. Additionally, branch chiefs of inspector(s) and technical staff(s) who were involved in these discussions should concur on the inspection report.

If a finding is identified, follow the guidance of Section 0612-06, "Documenting Findings Using the Four-Part Format." The finding and/or associated violation should be documented in **the** inspectable area section **of the report** in which the original URI was documented. If no findings or violations were identified, document the resolution in Section 4OA5 of the report.

0612-11 CLOSURE OF LICENSEE EVENT REPORTS (LERs)

Document reviews and closures of LERs, including revisions to LERs, in the inspection report under Section 4OA3, "**Follow-up of Events and Notices of Enforcement Discretion**." If inspection documentation in another section of the report provides a description of the event in the LER (e.g., event response), then reference that section under Section 4OA3 with a very brief description.

In general, LER reviews should have a brief description of the event and reference the docketed LER. If an LER review is already documented in a separate NRC correspondence, then close the LER with a brief statement in an inspection report referencing the separate correspondence. In addition, document closure of the LER as follows:

- a. No Violations, No NRC-Identified or Self-Revealed Findings, and No Licensee-Identified findings with pending or preliminary significance. Include a statement similar to "The

Licensee Event Report was reviewed. No findings or violations of NRC requirements were identified”.

- b. Minor Violations. Use guidance in Section 0612-14, “Minor Issues and Minor Violations.”
- c. Licensee-Identified NCVs. The safety significance and enforcement should be discussed per Section 0612-13, “Licensee-Identified Violations,” and not in the LER closeout section. A statement, such as “The enforcement aspects of this finding are discussed in Section 40A7,” should be included in the LER closeout section.
- d. NRC-Identified or Self-Revealed Findings, Licensee-Identified findings with pending or preliminary significance, or Traditional Enforcement Violations which are not Licensee-Identified NCVs. Use Section 0612-06, “Documenting Findings Using the Four-Part Format,” 0612-07, “Documenting Traditional Enforcement Violations Using The Four-Part Format”, or 0612-08, “Documenting Traditional Enforcement Violations and Findings Using a Combined Four-Part Format” if not previously documented.

0612-12 CLOSURE OF CITED VIOLATIONS

After receipt of the licensee’s response to a Notice of Violation and completion of any necessary inspections, document the closure of cited violations in Section 40A5, as applicable. The level of detail required to document closure of cited violations depends on the extent of corrective actions conducted by the licensee. In general, the write-up must summarize the inspector’s follow-up actions to evaluate the adequacy of any licensee actions and provide enough detail to justify closing the violation.

0612-13 LICENSEE-IDENTIFIED VIOLATIONS

NRC policy requires that all identified non-compliances be dispositioned in accordance with the Enforcement Policy, regardless of who identified them. Non-compliances are identified through inspection when they are selected as an issue of concern and screened through IMC 0612 Appendix B to determine the presence of a violation within the scope of an inspection sample. Particular attention should be given to screening all documented non-compliances captured in docketed communications such as those associated with required reporting (e.g., 10 CFR 50.72 and 10 CFR 50.73) and voluntary reports submitted at the licensee’s discretion.

Licensee-identified violations including those receiving traditional enforcement which meet the requirements for a NCV in accordance with Section 2.3.2 of the Enforcement Policy should receive minimal documentation in Section 40A7 of the inspection report. These non-cited licensee-identified violations associated Green findings of very low safety/security significance or which are Severity Level IV, are not considered during assessment of licensee performance in order to prevent discouraging an aggressive problem identification process.

All other non-minor violations not receiving enforcement discretion must be documented in accordance with Section 0612-06, “Documenting Findings Using the Four-Part Format,” 0612-07, “Documenting Traditional Enforcement Violations Using The Four-Part Format”, or 0612-08,

“Documenting Traditional Enforcement Violations and Findings Using a Combined Four-Part Format”

Section 40A7 must include an introductory statement similar to:

“The following violations of very low safety significance (Green) or Severity Level IV were identified by the licensee and are violations of NRC requirements which meet the criteria of the NRC Enforcement Policy, for being dispositioned as a Non-Cited Violation.”

For each licensee identified violation documented in Section 40A7:

- a. Describe what requirement was violated and how it was violated (this requires a “contrary to” statement consistent with guidance in the Enforcement Manual)
- b. Provide a reference to the licensee’s corrective action document number
- c. For violations of very low safety or security significance (Green), briefly describe why the finding is Green (e.g., the phase 1 question that was satisfied that caused the finding to be assessed as Green)
- d. For a traditional enforcement violation, identify why traditional enforcement is applicable and briefly describe the Severity Level categorization in accordance with the Enforcement Policy supplements

0612-14 MINOR ISSUES AND MINOR VIOLATIONS

Minor performance deficiencies, observations, and minor violations are not routinely documented in inspection reports. However, they may be documented when specifically allowed by an inspection procedure or temporary instruction, or when it becomes necessary to capture a required inspection activity or conclusion for the record such as closing out an LER, unresolved item, or follow-up to an allegation. When a minor performance deficiency or violation is documented, sufficient detail must be provided to allow an informed, independent reader to understand the basis for the minor determination.

For each minor performance deficiency or minor violation documented:

- a. Briefly describe the minor performance deficiency or minor traditional enforcement violation
- b. State the reason why the performance deficiency or traditional enforcement violation is minor in accordance with IMC 0612 Appendix B More-than-Minor screening questions or the Enforcement Policy as applicable
- c. For violations, state that the licensee has taken actions to restore compliance and include a statement similar to the following: “This failure to comply with [requirement] constitutes a minor violation that is not subject to enforcement action in accordance with the NRC’s Enforcement Policy.”

0612-15 OTHER GUIDANCE

15.01 Treatment of Third Party Reviews. Detailed NRC reviews of Institute of Nuclear Power Operations (INPO) evaluations, accreditation reports, findings, recommendations, and corrective actions, or other third party reviews with similar information are not referenced in NRC inspection reports, tracking tools, or other agency documents unless the issue is of such safety significance that no other reasonable alternative is acceptable. INPO findings, recommendations and associated licensee corrective actions are not normally tracked by the NRC. If a finding warrants tracking, it should be independently evaluated, documented, and tracked as an NRC finding.

INPO findings, recommendations, corrective actions, and operating experience which are placed in the licensee's corrective action program, can be considered appropriate for inspection. Additionally, when documenting review of these issues, inspection reports should not refer to any proprietary INPO reports or documents, INPO reference numbers, or identify specific sites when referencing operating experience. If it is necessary to document review of an INPO document (i.e., an evaluation referring to the INPO document was an inspection sample or justification for a cross-cutting aspect), then state the reference number of the reviewed item and provide general words for the title, if applicable (e.g., "Condition Report 235235 concerning industry information on pumps.")

If documenting review of an INPO evaluation or accreditation report, in accordance with Executive Director of Operations Policy 220, include, in Section 4OA5, a short statement that the review was completed. Do not include a recounting or listing of INPO findings or reference a final INPO rating when documenting an INPO evaluation or accreditation report review. Discuss the specifics of any significant differences between NRC and INPO perceptions with regional management.

15.02 Non-Routine Inspections. Inspection results from IMC 2515 Appendix C inspections, temporary instructions, and other non-routine inspection activities not addressed in this IMC are documented in Section 4OA5. In some cases, factual observations may be documented. If it is necessary to document a minor issue or minor violation, follow the guidance in Section 0612-14, "Minor Issues and Minor Violations."

15.03 Treatment of Sensitive Unclassified Non-Safeguards Information (SUNSI) in Non-Security Related Reports. SUNSI must not be made publicly available and must be segregated from other portions of the report which are to be made publicly available. This can typically be accomplished by creating and referencing a separate report enclosure which can be profiled in Agencywide Documents Access and Management System (ADAMS) as "Non-Publicly Available." The documents containing SUNSI must be marked in accordance with Management Directive 12.6, "NRC Sensitive Unclassified Information Security Program." Security inspection reports must not be used to document inspection activities or findings that fall outside of the security cornerstone unless otherwise directed. The NRC policy for handling, marking, and protecting SUNSI is publicly available on the NRC Public Web site at <http://www.nrc.gov/reading-rm/doc-collections/commission/comm-secy/2005/2005-0054comscy-attachment2.pdf>. Additional staff guidance for handling of SUNSI is published on the NRC internal WEB site at <http://www.internal.nrc.gov/sunsi/>.

15.04 Amending Inspection Reports. When it becomes necessary to correct an issued report, the previously issued report should generally be revised and reissued in its entirety under the same inspection report number. The revised report would receive a new and unique ADAMS accession number and should include an appropriate cover letter explaining why the report is being reissued. Changes which affect the Action Matrix or Substantive Cross-cutting Issues should be coordinated with the Performance Assessment Branch (IPAB). After the report is revised, the responsible branch should update the Reactor Program Systems database as appropriate and contact the Performance Assessment Branch (IPAB) lead for IMC 0305, "Operating Reactor Assessment Program" to initiate any required public web page updates. Note that a revised inspection report must not be used to document new inspection findings or inspection activities which occurred after the initial report was issued. Also, note that depending on the nature of the correction, it may be more appropriate to discuss the change in a future report, rather than to go back and reissue a complete report. An example of this is discussed in Section 16.06a for a change to a cross-cutting aspect.

15.05 Plain Language. Inspectors will use plain language in reports. For additional guidance, inspectors should refer to NUREG-1379, "NRC Editorial Style Guide."

0612-16 COMPILING AN INSPECTION REPORT

Each inspection report will have a cover letter, cover page, summary, report details, and attachments **with supplemental information** as described in this section. A table of contents and summary of plant status may be provided as discussed below. A standard inspection report outline is shown in Exhibit 1, "Standard Reactor Inspection Report Outline," of this IMC. The following additional guidance applies:

- Supplemental inspection results must also reflect the additional guidance provided in Appendix C, "Guidance for Supplemental Inspection Reports," of this IMC.
- IP 71152, "Problem Identification and Resolution," results have varying thresholds for documentation and must reflect the guidance provided in Appendix D, "Guidance for Documenting Inspection Procedure 71152 Problem Identification and Resolution," of this IMC.
- Escalated enforcement actions and cited violations must reflect the guidance found in the Enforcement Manual, Appendix B, "Standard Formats for Enforcement Packages."
- Issues which are subject to enforcement discretion must reflect the guidance found in the Enforcement Manual and IMC 0305, "Operating Reactor Assessment Program."

16.01 Cover Letter. Write a cover letter to transmit the overall inspection results and convey the inspection findings to the licensee. Inspection reports are sent from the applicable NRC official (branch chief, division director, or regional administrator) to the designated licensee executive. See Exhibit 2, "Inspection Report Documentation Matrix," of this IMC for what should and should not be documented in the inspection report cover letter. See Exhibit 4, "ROP Inspection Report Cover Letter Templates," of this IMC for additional guidance.

Guidance and cover letter formats for transmitting enforcement actions vary. Guidance and sample cover letters for enforcement-related correspondence are found in the Enforcement Manual, Appendix B.

Cover letter content varies somewhat depending on whether or not the inspection identified findings. In general, however, every cover letter has the same basic structure as follows:

- a. Date. The NRC seal and address are at the top of the first page and are followed by the date on which the report cover letter is signed and the report issued.
- b. Enforcement Action. If the report contains findings assigned an enforcement action (EA) number, then the EA number should be placed in the upper left-hand corner above the principal addressee's name.
- c. Addressee. The name and title of the principal addressee are placed at least four lines below the letterhead, followed by the licensee's name and address.
- d. Subject Line. The subject line of the letter must state the plant name and inspection subject (e.g., "XXXXX Generating Station – NRC Integrated Inspection Report") followed by the report number. The information presented in the subject line must be in the following sequence: plant name, type of inspection, report number. Use the official plant name and docket number.

The words "NOTICE OF VIOLATION" ("EXERCISE OF ENFORCEMENT DISCRETION" or "NOTICE OF DEVIATION," etc.) must be included if an enforcement action accompanies the inspection report.

- e. Salutation. Ensure the salutation follows the subject line.
- f. Introductory Paragraphs. The first two paragraphs of the cover letter should give a brief introduction, including the type of report (e.g., license renewal report, integrated inspection report) and pertinent dates (i.e., date of final exit meeting with licensee, date NRC was informed of licensee readiness for supplemental inspections, date decision was made that a reactive inspection would be conducted in response to events).
- g. Body. The body of the letter must discuss the most important topics first. The following identifies how different types of findings should be reflected in the cover letter for an inspection report.

| All Cover Letters | |
|--|---|
| If Report Contains: | Then: |
| No findings | Insert a separate paragraph with a statement similar to: "No findings were identified during this inspection." |
| Green non licensee identified findings | State the number of findings. Include a statement similar to: "[Number] NRC identified and [number] self-revealing |

| All Cover Letters | |
|---|---|
| If Report Contains: | Then: |
| | findings of very low safety significance (Green) were identified during this inspection.” |
| Violations not associated with a finding (e.g., enforcement discretion) | Discuss in accordance with the guidance described in the Enforcement Policy and Enforcement Manual. |
| Findings with assigned cross-cutting aspects | Include a statement similar to: “If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement to ...” |

| Non Security Cover Letters | |
|--|---|
| If Report Contains: | Then: |
| Severity Level IV violations or violations associated with Green findings are being dispositioned as NCVs or in NOVs | Document in accordance with the guidance in Appendix B, Form 2 of the Enforcement Manual as appropriate. |
| Findings with pending or preliminary significance | Briefly discuss the finding(s), in the order of significance if more than one finding. The cover letter should clearly state why the finding does not present an immediate safety concern, and (if appropriate) that licensee compensatory measures are in place while long-term corrective measures are being implemented. |
| Apparent violations being considered for a NOV that are either pending or preliminarily findings, or Severity Level III or above | Briefly discuss the violation(s)/finding(s), in the order of significance/Severity Level. Discuss in accordance with the guidance in the Enforcement Manual. The appropriate wording for findings that are also violations of requirements can be found in the Enforcement Manual. |

| Security Cover Letters | |
|--|---|
| If Report Contains: | Then: |
| Findings with assigned cross-cutting aspects | Include a brief description of all assigned cross-cutting aspects without describing inspection finding details. |
| Severity Level IV violations or violations associated with Green findings are being dispositioned as NCVs or in NOVs | Document in accordance with the guidance in Appendix B, Form 2 and 2(S) of the Enforcement Manual as appropriate. |

| Security Cover Letters | |
|--|---|
| If Report Contains: | Then: |
| Findings with pending or preliminary significance | State one or more pending or preliminary findings of significance have been identified or that one or more violations are being considered for escalated enforcement. |
| Apparent violations being considered for a NOV that are either pending or preliminarily findings, or Severity Level III or above | For pending or preliminary findings or apparent violations do not: <ul style="list-style-type: none"> • Describe or provide specific details • State the number of findings or violations • Identify the actual significance (i.e., color) or Severity Level |

- h. Closing. The final paragraph consists of standard legal language that varies depending on whether enforcement action is involved. See the cover letter template in of Exhibit 4 of this IMC.

The signature of the appropriate NRC official is followed by the docket number(s), license number(s), enclosures, and distribution list.

- i. Security Inspection Reports. The cover letters for security inspection reports are similar in format to other inspection report cover letters, but do not include details or descriptions of any inspection findings. The cover letters must state the number of Green findings identified and a brief description of cross-cutting aspects, if applicable. However, the letters will not state the number of greater than Green findings (if any were identified), only that findings with greater-than-Green significance have been identified and a brief description of cross-cutting aspects, if applicable. See Exhibit 4 of this IMC for standard paragraphs to include in security report cover letters.
- j. NOV. If a NOV is being issued with the report, develop a NOV attachment using the guidance in the Enforcement Manual.

16.02 Cover Page. The report cover page gives a succinct summary of information about the inspection. It contains: the docket number(s), license number(s), report number, licensee name, facility name, facility location (city and state), dates of the inspection, names and titles of participating inspectors (and may include names of those inspectors who have achieved basic inspector certification but are not yet fully qualified), and name and title of the approving NRC manager. The inspection report number is to be identified in the following form as required by IMC 0306, "Information Technology Support for the Reactor Oversight Process":

Docket No. / Year [sequential number of the report in that year] (e.g.,
05000410/2003001)

16.03 Table of Contents. If a report is considered complicated or of significant length, then develop a table of contents. A table of contents is optional.

16.04 Summary. The summary should be an informative but concise overview of the significant inspection findings contained in the details of the report. It will also be used for entries to the Agency-wide Document Access and Management System (ADAMS) and the Reactor Program Systems (RPS) Plant Issues Matrix (PIM).

- a. The first paragraph of the summary section is used to describe the inspection report in ADAMS (title field in the ADAMS profile, currently limited to 254 characters).

The paragraph must include, in the following order:

1. The inspection report number (See IMC 0306 for format)
2. The dates of the inspection
3. The name of the site
4. The titles of only the inspection procedures or attachments in which findings were identified (e.g., equipment alignment, fire protection, operability determinations and functionality assessments)

If no findings were identified, the general inspection area or title of inspection report should be listed (e.g., integrated report, or emergency preparedness report, or biennial problem identification and resolution report, or special inspection report).

For non-routine inspections, the same format should be followed to identify the report number, unit names, and dates of inspection. These are followed by the title of the inspection and a list of findings.

- b. Summary Paragraph. The summary paragraph identifies who conducted the inspection (i.e., resident and/or specialist inspectors), the inspection period, and the number and types of findings and/or violations.

End the summary paragraph with a statement similar to “The significance of inspection findings are indicated by their color (i.e., greater than Green, or Green, White, Yellow, Red) and determined using IMC 0609, “Significance Determination Process” dated [issue date]. Cross-cutting aspects are determined using IMC 0310, “Components Within the Cross Cutting Areas” dated [issue date]. All violations of NRC requirements are dispositioned in accordance with the NRC’s Enforcement Policy dated [issue date]. The NRC’s program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, “Reactor Oversight Process” revision [number].”
Inspectors may omit portions of this statement as deemed appropriate to the circumstances discussed in the report.

- c. List of Findings and Violations. Write a two paragraph summary for each issue that is designated a finding, violation, or an apparent violation.

Do not document the following in the summary: licensee-identified NCVs, minor violations, and unresolved items.

1. First Paragraph

- (a) Begin the summary for each finding or violation with the significance color and/or Severity Level. Use TBD for those findings or violations where the final significance or Severity Level has not yet been determined.
- (b) Describe the performance deficiency and identify the specific requirement that was violated including any enforcement action, as applicable. Identify if the finding or violation is self-revealing, NRC identified, or licensee identified.
- (c) For violations, briefly describe the immediate corrective actions completed to restore compliance and/or alleviate any immediate safety or security concerns, those corrective actions planned or under evaluation by the licensee, and a statement that the condition has been placed into the licensee corrective action program, as applicable.

Second Paragraph

- (a) Briefly summarize the finding's significance from the analysis section. Briefly describe why the finding is More-than-Minor, provide the effect on the cornerstone, and state why the finding is not greater than Green (if applicable).
 - (b) If a cross-cutting aspect was assigned to the finding, restate the cross-cutting aspect, why it was assigned, discussion of present licensee performance (as applicable), and the alpha-numeric identifier. If the finding does not have a cross-cutting aspect, include a statement briefly describing the reason for not assigning a cross-cutting aspect.
 - (c) Each summary must end with a reference to the section of the report in which the finding is discussed.
2. Group the finding summaries by cornerstones in the order specified in Exhibit 1 of this IMC. Findings or violations not associated with a cornerstone should be listed at the end under "Other Findings".
 3. If licensee identified violations are documented in Section 4OA7 of the report, include a statement similar to the following as the last paragraph of the summary:

"Violations of very low safety or security significance or Severity Level IV that were identified by the licensee have been reviewed by the NRC. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. These violations and corrective action tracking numbers are listed in Section 4OA7 of this report."
 4. If no findings or violations were identified for assessment, include a statement similar to "No findings were identified" after the summary paragraph.

16.05 Plant Status. If appropriate, write a Summary of Plant Status section. If used, briefly describe pertinent operational events, such as any plant shutdowns or significant changes in power. This summary is not needed for specialist inspections since plant operating status may not be relevant to a safeguards or emergency preparedness inspection.

16.06 Report Details.

- a. Report Outline. Arrange the report details in accordance with the standard report outline shown in Exhibit 1 of this IMC. Each outline topic (inspectable area) does not have to be covered in each report. When an inspection is performed in a particular area, the resulting details are placed in the corresponding section of the report.

In those cases where a standard format is not readily applied, the most important subject should be identified first, followed by a discussion of major topics identified in descending order of significance.

Exceptions to the standard format include:

- Supplemental inspection reports
- Augmented Inspection Team (AIT) reports
- Special Inspection Team (SIT) reports
- Other cases where the specifically directed focus of the inspection does not easily fit into the standardized report outline (i.e., license renewal inspections)

Findings, violations, and unresolved items are documented under the inspectable area in which the issue was discovered. Additionally Section 4OA5 of the inspection report should be used to document the following:

- A finding or traditional enforcement violation which is unrelated to a specific inspectable area,
 - A violation without an associated performance deficiency which does not involve willfulness, actual safety consequences, or impeding the regulatory process
 - A change to a previously assigned cross-cutting aspect discussed in a previous issued inspection report. The change and its basis should be incorporated into the quarterly integrated inspection report and the original PIM entry revised to reflect the appropriate change.
- b. Format of Each Inspectable Area. Some inspection procedures may include additional requirements pertaining to documentation (e.g., IP 71151, "Performance Indicator Verification", and Temporary Inspections). Each inspectable area must include an Inspection Scope and Findings section as described below:
1. Inspection Scope Section. For each inspectable area, describe the inspection scope. Do not repeat any portion of the Scope in the Findings section. The scope should:

- (a) Identify how the inspection was conducted (i.e., the methods of inspection.) Methods can include a walk-down, an in-office review, observation of test from the control room, discussion with specific personnel, or participation in an exercise.
- (b) Identify what was inspected. Include sufficient detail on which and how many samples were completed. If more than six documents were reviewed, then list the items in an attachment and reference the attachment in the Scope section.
- (c) Identify the inspection objectives and the criteria that were used to determine whether the licensee is in compliance.
- (d) Include inspection dates to clarify inspection scope context if it helps with understanding the scope. For example, inspection dates may be helpful when discussing event follow-up.

If a substantive portion of the inspection activity was conducted at a location other than the plant, (e.g., an in-office review), then identify where the inspection took place.

- 2. Findings Section. Document each finding and/or violation as appropriate in accordance with Section 0612-06, "Documenting Findings Using the Four-Part Format," 0612-07, "Documenting Traditional Enforcement Violations Using The Four-Part Format", or 0612-08, "Documenting Traditional Enforcement Violations and Findings Using a Combined Four-Part Format" Document each URI in accordance with Section 0612-10 "Unresolved Items." Present the findings and/or violations within each report section in order of importance. If no findings or violations require documentation within an inspectable area (e.g., minor violations or performance deficiencies), then include a statement similar to "No findings were identified" in the findings section of the report.

Observations not directly related to a finding or URI may be documented if allowed by an appendix to this chapter or by the specific inspection procedure or temporary instruction.

All NRC-identified and self-revealing findings (FINs), violations (VIOs), and non-cited violations (NCVs), as well as apparent violations (AV) and unresolved items (URIs) must be assigned a sequential tracking number in accordance with IMC 0306. A brief title for the finding will be listed after the assigned tracking number. This title will be entered into the PIM and should describe the performance deficiency that is the basis for the finding.

- c. Graphics/Visual Aids. Use of graphics (drawings, diagrams, photographs, or photocopies) is permissible if their inclusion will simplify describing a complex condition that would otherwise require substantially more text. However, including graphics may complicate report processing and result in excessive file sizes.

Photographs of plant areas or equipment or photocopies of technical or vendor manual pages must be handled in accordance with IMC 0620. All graphics must adhere to the following guidelines:

1. All graphics must be in a jpeg format and sized (height, width, and resolution) so as not to significantly increase overall file size
2. Keep each graphic to a reasonable size (e.g.: <math>< \frac{1}{2}</math> page), or put in attachment
3. Centered on page and left/right indented from the text
4. Each graphic must have a unique identifier (Figure/Diagram/Photograph X) with a descriptive title (e.g., Breaker Trip Latch Alignment)

16.07 Exit Meeting Summary. Write a brief summary of the exit meeting in Section 4OA6. This information will also be described in the first paragraph of the cover letter. The summary must identify the most senior licensee manager who attended the meeting and must include the following information:

- a. Proprietary Information. In accordance with IMC 2515, Section 12.01, if proprietary information is reviewed during an inspection, the inspector should confirm with the licensee at the exit meeting that the NRC has (or has not) returned the proprietary materials used during the inspection. If the inspectors did not retain proprietary information, or use proprietary information in the report, use a statement similar to:

“The inspectors verified that no proprietary information was retained by the inspectors or documented in this report.”

If there is a compelling need for the report to include proprietary material, refer to IMC 0620 for further actions.

NOTE: When an inspection is likely to involve proprietary information (i.e., given the technical area or other considerations of inspection scope), handling of proprietary information should be discussed at the entrance meeting.

- b. Subsequent Contacts or Changes in NRC Position. If the NRC's position on an inspection finding changes after the exit meeting, conduct an additional exit meeting to discuss that change with the licensee. Also, document the additional exit meeting in the inspection report.
- c. Do not characterize a licensee's exit meeting response. If the licensee disagrees with an inspection finding, this position may be characterized by the licensee in its formal response to the inspection report, if applicable. Additionally, do not attempt to characterize or interpret any oral statements the licensee makes, at the exit meeting or at any other time during the inspection, as a commitment.

16.08 Report Attachments. The attachments discussed below are included at the end of the inspection report if applicable to the inspection. The attachments may be combined into a single attachment entitled "Supplementary Information."

- a. List of Items Opened, Closed, Discussed, and Updated. The report must include a quick reference list of items opened, closed, and updated, including the item type, the tracking number for the item, and the item title (used in PIM headers describing the item). Open items that were discussed (but not closed) should also be included in this list, along with a reference to the sections in the report in which the items are discussed. NCVs will normally be opened and closed in the initiating inspection report.
- b. Key Points of Contact. List, by name (first initial and last name) and title, those individuals who furnished relevant information or were key points of contact during the inspection (except in cases where there is a need to protect the identity of an individual). The list should not be exhaustive but should identify those individuals who provided information related to developing and understanding findings. The list includes the most senior licensee manager present at the exit meeting and NRC technical personnel who were involved in the inspection if they are not listed as inspectors on the cover page.
- c. List of Documents Reviewed. A list of the documents and records reviewed during an inspection must be publicly available for publically available inspection reports. The list need not include those reviewed documents and records already identified in the body of the report nor those which, upon review, were determined not to support the inspection scope and determinations.

The level of detail for listed documents must be sufficient to allow the NRC to retrieve the document from the licensee in the foreseeable future. Therefore, a unique identifier, which may include the tracking number, title, revision and/or date, must be provided for each document referenced.

If it is necessary to document review of an INPO document (i.e., an evaluation referring to the INPO document was an inspection sample or justification for a cross-cutting aspect), then state the reference number of the item reviewed and provide general words for the title (e.g., "November 2011 INPO plant assessment of Your Plant" dated January 17, 2012)

- d. List of Acronyms. Acronyms should be spelled out when first used in inspection report text (e.g., Reactor Oversight Process (ROP)). Optionally, a list of acronyms can be included in the inspection report or referenced. When referenced the list of acronyms should be made publically available for publically available reports.

0612-17 ISSUING INSPECTION REPORTS

17.01 Report Timeliness.

- a. Most inspection reports, including special inspections, should be issued no later than 45 calendar days after inspection completion.
- b. Timeliness goals should be accelerated as necessary for inspection reports covering potential escalated enforcement actions and as specified in Management Directive 8.3, "NRC Incident Investigation Program," for reactive inspections (e.g., 30 calendar days for Augment Inspection Teams)

NOTE: For integrated inspection reports (e.g., resident inspector quarterly report), the inspection completion is normally defined as the last day of the inspection quarter. For all other inspection reports (e.g., team inspections), the inspection completion is normally defined as the day of the exit meeting.

17.02 Release and Disclosure of Inspection Reports.

- a. General Public Disclosure and Exemptions. Except for report enclosures containing exempt information (see IMC 0620), all non-security cornerstone inspection reports will be disclosed routinely to the public.
- b. Security Cornerstone Inspection Reports. Inspection reports for the security cornerstone will not be made publicly available. Security-related inspection reports will be sent to the respective State Liaison Officers and State Homeland Security Advisors, when they have been appointed, authorized, communicated a desire to receive the report, and have the resources to control the safeguards information (SGI). These reports will be controlled and marked as SGI or Official Use Only – Security Related Information (SUNSI) based on the level of information contained in them. The cover letters to the reports will be made publicly available.

The cover letters will be marked for the highest level of controlled information contained in the inspection report: official use only (SUNSI) or SGI. The marking requirements for safeguards information are in Management Directive 12.6, “NRC Sensitive Unclassified Information Security Program,” and the requirements for marking security-related official use only documents are on the Web at: <http://www.internal.nrc.gov/sunsi/>, “Sensitive Unclassified Non-Safeguards Information (SUNSI).”

- c. Release of Investigation-Related Information. When an inspector accompanies an investigator on an investigation, the inspector must not release either the investigation report or his or her individual input to the investigation report. This information is exempt from disclosure by 10 CFR 9.17, “Agency Records Exempt from Public Disclosure,” and must not be circulated outside the NRC without specific approval of the Chairman (refer to OI Policy Statement 23).

The latest revisions of the following exhibits and appendices may be accessed from the NRC Public Inspection Manual Chapters Web Page, located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/manual-chapter/index.html>.

The latest revisions of NRC Public Inspection Procedures are also available at the NRC Public Inspection Procedures Web Page, located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/>.

EXHIBITS

- | | |
|------------|---|
| Exhibit 1: | Standard Reactor Inspection Report Outline |
| Exhibit 2: | Inspection Report Documentation Matrix |
| Exhibit 3: | [Reserved for Sample Reactor Inspection Report] |
| Exhibit 4: | ROP Inspection Report Cover Letter Templates |

APPENDICES

Appendix A: Acronyms Used in Inspection Manual Chapter 0612

Appendix B: Issue Screening

Appendix C: Guidance for Supplemental Inspection Reports

Appendix D: Guidance for Documenting Inspection Procedure 71152 Problem Identification and Resolution

Appendix E: Examples of Minor Issues

Appendix F: Examples of Cross-Cutting Aspects

END

Attachment 1 – Revision History for IMC 0612

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
|----------------------------|--|---|---------------------------------------|--|
| N/A | 02/10/2006 | Revision history reviewed for the last four years. | N/A | N/A |
| N/A | ML021280215 04/29/2002 CN 02-021 | Initial issue of IMC 0612. Revised from IMC 0610* to address revised documentation requirements of the revised Reactor Oversight Process (ROP). This revision changed the manner in which findings are documented, deleted "no color" findings and the requirements to add licensee identified violations to the Plant Issue Matrix. Other Major changes involved re formatting several sections for clarity; provided a sample inspection report (to be issued separately); re structured and revised the thresholds for documentation (Appendix B); provided numerous new examples of minor violations in Appendix E; and provided a revised format for documenting findings. | None | N/A |
| N/A | ML031610632 06/20/03 CN 03-021 | IMC 0612 Power Reactor Inspection Reports main body, app appendices and exhibits were revised to achieve the following: 1. Consistency with IMC 0306 (Information Technology Support for the Reactor Oversight Process) 2. Presented information in the order in which the activities will normally be performed in the process of developing and transmitting a reactor inspection report. 3. Removed specific enforcement guidance to ensure consistency between the guidance in IMC 0612 and the Enforcement Policy and Enforcement Manual. 4. Corrected incorrect or conflicting information. | None | N/A |
| N/A | ML040150518 01/14/04 CN 04-001 | Changed the inspection report timeliness to 45 calendar days for most inspection reports, including Special Inspections. | None | N/A |

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
|----------------------------|--|---|---------------------------------------|---|
| N/A | ML052700137 09/30/05 CN 05-028 | Revised to clarify definitions for NRC identified, self revealing and licensee identified; to provide additional guidance on how to document cross cutting issues; to improve guidance on LER closure; to update the new report timeliness requirement; and to reflect changes made to the document based on inspector feedback. | Yes but not prior to issuance | N/A |
| N/A | ML061300434 06/22/06 CN 06-015 | Revised to provide additional guidance and requirements for documenting cross-cutting aspects of inspection findings and to provide guidance on inspection report approval requirements when resolution to unresolved items are based on discussions between inspector(s) and NRR technical staff(s). Enhancing the ROP to more fully address safety culture (SRM 04-0111). Commitment tracking added to IMC 0612 in connection with relocating guidance specific to documenting cross-cutting attributes (CCAs) in inspection reports from IMC 0305 to IMC 0612. | Yes 07/01/06 | ML061510135 |
| N/A | ML063000257 11/02/06 CN 06-033 | Revised definition of performance deficiency to bring the definition in alignment with the basis for performance deficiency as described in ROP basis document, IMC 0308 Attachment 3, "Significance Determination Process Basis Document." | Yes 09/06/06 | ML063000483 |
| N/A | ML070720191 09/20/07 CN 07-029 | IMC 0612 has been revised to add guidance on NRC use of INPO documents and on cover letters for security inspections. Also enhanced guidance on NCVs and SCAQs. | None | ML071560246 |
| N/A | ML082270500 12/04/08 CN 08-034 | IMC 0612 has undergone a major re-write to incorporate numerous feedback forms and to add additional guidance for documenting inspection findings. | Yes but not prior to issuance | ML083220722 |

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|----------------------------|--|--|---------------------------------------|--|
| | ML091590492 04/30/10 CN 10-013 | <p>Support changes to IMC 0612 App B to Enhance Integration of ROP with traditional enforcement and consolidation of screening guidance to App B.</p> <p>Recognize creation of IMC 0310 and relocate guidance specific to screening and documenting cross-cutting attributes (CCAs) from IMC 0305 to IMC 0612 App B and IMC 0612, respectively.</p> <p>Address (in part) Feedback Forms 0612-1304, -1352, -1355, -1359, -1365, -1393, -1403, -1410, -1411, -1418, -1419, -1420, -1437, and -1451 associated with documentation of apparent violations, screening analysis, self-imposed standards, SUNSI, cross-cutting finding attributes, findings involving enforcement discretion, screening of minor PDs, definition/glossary topics, establishing an appropriate level-of-guidance, inclusion of appropriate external references.</p> <p>Consolidate all screening guidance from Section 0612-05 'Screening Inspection Results,' into Appendix B screening guidance.</p> <p>Enhance document usefulness through enhanced use of hyperlinked content.</p> | Yes but not prior to issuance | ML091480470 |

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|----------------------------|--|--|---------------------------------------|---|
| | ML12058A229 07/10/12 CN 12-014 | <p>This revision is a complete reissue which improves the integration of traditional enforcement into the Reactor Oversight Process (ROP). Significant changes include: Clarified purpose of IMC, revised definitions (present performance, issue of concern, pending significance, preliminarily significance), clarified guidance for documenting traditional enforcement licensee identified violations, added additional guidance to direct the documentation of traditional enforcement violations and associated findings in a combined write-up, corrected numerous terminology issues, enhanced and clarified the documentation requirements for CCAs, redefined present performance as it applies to CCA screening, removed guidance related to photography and SUNSI that is redundant to IMC 0620, and added additional guidance on documenting licensee-Identified violations.</p> | None | ML12128A372 Closed FF: 0612-1352, 1434, 1437, 1469, 1490, 1491, 1492, 1493, 1494, 1495, 1497, 1498, 1499, 1502, 1508, 1509, 1528, 1533, 1552, 1559, 1565, 1566, 1567, 1569, 1572, 1588, 1592, 1595, 1596, 1621, 1628, 1669, 1672, 1681, 1697, 1717, 1766 |
| | ML12244A483 01/24/13 CN 13-003 | <p>Added requirement to add statement indicating cross-cutting aspects assigned to licensee-Identified pending or preliminary findings are conditional on non-Green SDP results. Added additional guidance related to documenting findings with pending significance. Added guidance related to reissuing inspection reports. Clarified definition of performance deficiency (application or meaning of definition was not changed see IMC 0308 Att 3 for basis). Added note to present performance definition. Revised wording for NCV treatment under section 6.03b8(a) to conform with Section 2.3.2 of the Enforcement Policy. Added requirement to use plain writing in inspection reports. Added definition for Observation which was inadvertently removed during the last revision.</p> | None | ML12293A326 Closed FF: 0612-1802 & 1807 |