

# **NRC INSPECTION MANUAL**

IRIB

---

INSPECTION MANUAL CHAPTER 0612

---

POWER REACTOR INSPECTION REPORTS

## Table of Contents

0612-01	PURPOSE .....	1
0612-02	OBJECTIVES .....	1
0612-03	DEFINITIONS .....	1
03.01	Apparent Violation (AV) .....	1
03.02	Cross-Cutting Aspect (CCA) .....	1
03.03	Finding.....	1
03.04	Issue of Concern .....	2
03.05	Licensee-Identified.....	2
03.06	Minor Violation .....	2
03.07	Non-Cited Violation (NCV) .....	2
03.08	Notice of Violation (NOV).....	2
03.09	NRC-Identified .....	2
03.10	Observation .....	2
03.11	Pending Significance .....	2
03.12	Performance Deficiency.....	2
03.13	Preliminary Significance.....	2
03.14	Present Performance.....	2
03.15	Regulatory Requirement.....	3
03.16	Standard or Self-Imposed Standard.....	3
03.17	Self-Revealed .....	3
03.18	Sensitive Unclassified Non-Safeguards Information (SUNSI) .....	3
03.19	Severity Level (SL) .....	3
03.20	Significance Determination Process (SDP).....	3
03.21	To Be Determined (TBD) .....	3
03.22	Traditional Enforcement (TE).....	4
03.23	Unresolved Item (URI) .....	4
03.24	Violation.....	4
0612-04	RESPONSIBILITIES AND AUTHORITIES .....	4
0612-05	ISSUE SCREENING.....	5
0612-06	DOCUMENTING FINDINGS USING THE FOUR-PART FORMAT .....	5
06.01	Introduction.....	5
06.02	Description .....	5
06.03	Analysis.....	6
06.04	Enforcement .....	8
0612-07	DOCUMENTING TRADITIONAL ENFORCEMENT VIOLATIONS WITHOUT AN ASSOCIATED FINDING OR ENFORCEMENT DISCRETION USING THE FOUR- PART FORMAT .....	9
07.01	Introduction.....	9
07.02	Description .....	10
07.03	Analysis.....	10
07.04	Enforcement .....	10
0612-08	DOCUMENTING TRADITIONAL ENFORCEMENT VIOLATIONS AND ASSOCIATED FINDINGS USING A COMBINED FOUR-PART FORMAT.....	11
08.01	Introduction.....	11
08.02	Description .....	11
08.03	Analysis.....	11

08.04	Enforcement .....	11
0612-09	VIOLATIONS WARRANTING ENFORCEMENT DISCRETION .....	12
0612-10	UNRESOLVED ITEMS .....	12
0612-11	CLOSURE OF LICENSEE EVENT REPORTS (LERs) .....	13
0612-12	CLOSURE OF CITED VIOLATIONS .....	14
0612-13	LICENSEE-IDENTIFIED VIOLATIONS .....	14
0612-14	MINOR ISSUES AND MINOR VIOLATIONS .....	15
0612-15	OTHER REQUIREMENTS .....	15
15.01	Treatment of Third Party Reviews.....	15
15.02	Non-Routine Inspections.....	16
15.03	Treatment of Sensitive Unclassified Non-Safeguards Information (SUNSI) in Non-Security Related Reports .....	16
15.04	Amending Inspection Reports.....	16
15.05	Plain Language.....	16
15.06	Documenting Multiple Examples of a Finding. ....	16
0612-16	COMPILING AN INSPECTION REPORT .....	17
16.01	Cover Letter.....	17
16.02	Cover Page.....	17
16.03	Table of Contents .....	17
16.04	Summary .....	18
16.05	Plant Status .....	19
16.06	Report Details.....	20
16.07	Exit Meeting Summary.....	21
16.08	Report Attachments .....	22
0612-17	ISSUING INSPECTION REPORTS .....	23
17.01	Report Timeliness.....	23
17.02	Release and Disclosure of Inspection Reports.....	23
EXHIBITS	.....	24
APPENDICES	.....	24

## 0612-01 PURPOSE

01.01 **Convey** the **basic requirements and content for preparing** power reactor inspection reports.

01.02 **Provide requirements** for inspection issue screening and for documenting power reactor inspections and findings, **violations, and observations**.

01.03 **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 **Screen** inspection results to determine if issues warrant documentation in inspection reports.

02.02 **Clearly** communicate significant inspection results in a consistent manner to licensees, NRC staff, and **the public**.

02.03 **Document** the basis for significance determination and enforcement action.

02.04 **Provide** inspection results as input into the Operating Reactor Assessment Program (Inspection Manual Chapter (IMC) 0305) of the ROP.

02.05 **Ensure that violations are dispositioned in accordance with the Enforcement Policy and to ensure that performance deficiencies are screened, assessed, and documented in accordance with this IMC.**

## 0612-03 DEFINITIONS

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

03.01 **Apparent Violation (AV)**. A non-compliance with a regulatory requirement for which an enforcement decision has not been reached.

**Examples include:** (a) **violations** associated with ROP findings having pending or preliminary significance, (b) **traditional enforcement violations** being considered for escalated enforcement action, (c) violations being considered for enforcement discretion.

03.02 **Cross-Cutting Aspect (CCA)**. Refer to IMC 0310, "**Aspects Within Cross Cutting Areas**" for the definition.

03.03 **Finding**. A performance deficiency **determined to be** More-than-Minor in **accordance with IMC 0612, Appendix B**.

03.04 Issue of Concern. A well-defined observation or collection of observations **potentially impacting** safety or security which may warrant further inspection, screening, evaluation, or regulatory action.

03.05 Licensee-Identified. Licensee-identified findings and violations are (1) identified as a result of deliberate observation by licensee personnel; and (2) entered into the licensee corrective action program.

Examples of deliberate observations that result in licensee-identified findings or violations include (1) those identified during activities such as post maintenance testing, operator rounds, engineering walkdowns, drills, critiques, or audits; and (2) degraded conditions identified during testing which do not result in test failure.

03.06 Minor Violation. A violation associated with a minor performance deficiency or a **traditional enforcement violation** that is less than **Severity Level (SL) IV**. **All violations, including minor violations, must be corrected**. **Minor violations** are not **routinely** documented in inspection reports.

03.07 Non-Cited Violation (NCV). A method for dispositioning a **SL IV** violation or a violation associated with a **Green ROP** finding that **meets the criteria in Section 2.3.2** of the Enforcement Policy.

03.08 Notice of Violation (NOV). A written notice setting forth one or more violations of a legally binding requirement (**see 10 CFR 2.201, "Notice of Violation"**).

03.09 NRC-Identified. NRC-identified findings or violations are 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 inadequacies in the licensee's characterization or evaluation of the issue of concern.

03.10 Observation. A factual detail noted during an inspection.

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

03.12 Performance Deficiency. **The licensee's failure to satisfy one or more regulatory requirements or self-imposed standards where such failure was reasonably foreseeable and preventable**. Additional information is provided in Block 2 of Appendix B of this IMC.

03.13 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.

03.14 Present Performance. The potential **CCA** is reflective of present performance if the performance deficiency (not the event or condition resulting from the performance deficiency) **occurred recently**, nominally within the last three years. **When appropriate, apply additional considerations** to determine **whether** the **CCA** 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 **CCA** 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 **CCA** is not reflective of present performance.

Note: Corrected or eliminated **CCAs** means the licensee had taken actions prior to the discovery of the performance deficiency and because of these actions, a similar issue would not likely occur now. For example, the licensee initiates actions to improve the quality of calculations; however, two months later, the inspector identifies problems with a calculation which had been issued a year before this effort. If the inspector believes the licensee's actions to improve calculations would have prevented this recently identified issue, the inspectors can conclude the performance deficiency is not reflective of current performance.

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

03.16 **Standard or Self-Imposed Standard.** A licensee-established expectation that does not constitute a **regulatory** requirement.

03.17 **Self-Revealed.** Self-revealed findings or violations are those identified as a result of a condition that (1) become apparent through a readily detectable degradation in material condition, capability, or functionality of equipment or plant operations; and (2) does not meet the definition of licensee-identified or NRC-identified.

Examples of self-revealed findings or violations include those revealed through: unplanned reactor trips and secondary plant transients; obvious equipment and piping failures; failed on demand testing; valid plant or electronic dosimeter alarms; identification of large quantities of fluids in areas where one would not normally expect such a condition.

03.18 **Sensitive Unclassified Non-Safeguards Information (SUNSI).** Any information of which the loss, misuse, modification, or unauthorized access to 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.

03.19 **Severity Level (SL).** The significance of a violation evaluated under traditional enforcement.

03.20 **Significance Determination Process (SDP).** The process described by 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).

03.21 **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.

03.22 Traditional Enforcement (TE). 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.

03.23 Unresolved Item (URI). An issue of concern associated with inspection activity which requires more information to determine if: (a) a performance deficiency exists, (b) the performance deficiency is More-than-Minor, or (c) the issue of concern potentially constitutes a violation.

03.24 Violation. The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, technical specification. Violations can be non-cited, cited, escalated or dispositioned using enforcement discretion.

#### 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 summary, inspection details, and supplemental information.

04.02 Inspectors. Prepare power reactor inspection reports in accordance with the direction provided in this IMC.

- a. Ensure that inspection results are properly characterized, objectively supported, and accurately documented.
- b. Ensure that inspection reports do not communicate regulatory determinations or actions not established in accordance with approved processes.
- c. Ensure referenced material is correctly documented.
- d. Ensure that the inspection report documents the conclusions presented to the licensee at the exit or re-exit meetings.

04.03 Branch Chiefs or Division Directors. Review each inspection report to ensure it is consistent with the direction provided in this IMC.

- a. Ensure that inspection findings, determinations, and actions are consistent with NRC policies, directions, and technical requirements. For example, ensure that screening and significance determinations documented 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.

- b. **Ensure** that violations are addressed in accordance with the Enforcement Policy and the Enforcement Manual.
- c. **Ensure** the content, tone, overall regulatory focus, and timeliness of inspection reports are appropriate and **support agency goals**.

04.04 Division of Inspection and Regional Support – Reactor Inspection Branch.

- a. **Provide interpretations and support for information contained in this IMC.**
- b. **Facilitate resolution of identified gaps in IMC directions and guidance.**

0612-05 **ISSUE SCREENING**

**See** Appendix B of this IMC.

0612-06 **DOCUMENTING FINDINGS USING THE FOUR-PART FORMAT**

This section provides instructions for documenting findings **without associated TE violations**.

**Findings** are documented using the four-part format, organized as follows:

- Introduction
- Description
- Analysis
- Enforcement

06.01 Introduction. **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-revealed, NRC-identified, or licensee-identified).
- d. For violations, the requirement violated and whether it is **an NCV, AV, or NOV**.

06.02 Description. **Describe** the circumstances associated with the finding **or violation or both**, and include the factual information that **is both necessary and sufficient** to support the **determinations described** in the analysis and enforcement sections **and to enable an informed, independent reader to understand the actual or potential impact to safety or security**. Include the **approximate dates the NRC and licensee became aware of the problem**. Also include **references to any other documented inspection activities or docketed correspondence associated with the finding or violation (e.g., URIs, LERs) as appropriate**. For findings **or violations** determined to be NRC-identified because the inspector identified a previously



unknown weakness in the licensee’s classification, evaluation, or corrective actions, **include** evidence that the licensee had identified the issue **but** failed to properly classify, evaluate, or correct the problem. Most findings 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 **any documented** conclusions.

- a. The first part must include the **basis for the finding**.
  1. **State** the performance deficiency. Identify the requirement or standard that was not met and **describe** how the licensee failed to **satisfy the requirement or standard**. Refer to Section **15.06** when documenting multiple examples of a finding.
  2. **Identify an appropriate** More-than-Minor screening question found in IMC 0612 Appendix B that was answered “yes” for the stated performance deficiency. Describe the reason why the identified screening question was answered “yes” (e.g., describe how the cornerstone objective was adversely affected, describe the potential to lead to a more significant safety concern if left uncorrected).
- b. The second part must describe the logic used to determine the significance of the finding.

If the significance has been determined, then characterize the finding as described below.

**For** those findings with pending significance (i.e., the SERP **has not** determined the significance characterization), state that the finding could not be screened to Green and is pending a significance determination. **Characterize** the finding as described in items 1(a), 2(a), 4(a), 4(b), and 4(d) below. **When** the **preliminary or final** significance **determination is** complete, **document** 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) **Any** assumptions used in the determination (these assumptions may be referenced and described in the report attachment).
  - (d) The resulting color.
2. **For** risk-informed SDP (e.g., IMC 0609 **Appendix A, F, G, H, K**) results describe:
  - (a) **The screening criteria used to assess the finding as Green or the satisfied screening criterion that caused the finding to be assessed in a more detailed risk evaluation or analysis.**

- (b) For a detailed risk evaluation or analysis that results in a Green characterization, include the most dominant core damage sequences, any remaining mitigation capability or recovery credit **or both** that limited the significance and the exposure time.
  - (c) For a detailed risk evaluation or analysis that results in a greater than Green characterization, include the most dominant core damage sequences, any mitigation capability or recovery credit **or both** that affected the significance and the exposure time.
3. **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.
4. **For** all pending or preliminarily significance characterizations discuss the following:
- (a) **For findings without an associated violation,**
    - (1) Why the finding does not present an immediate safety or security concern.
    - (2) **Any** compensatory measures in place while licensee long-term corrective measures are being implemented.
  - (b) For findings with preliminarily significance, include the risk characterization or other basis as determined by the SERP.
  - (c) State that the significance **determination** is **preliminary or pending an initial significance characterization**. Emphasize that the safety **or security** characterization is not yet finalized. Do not make statements regarding safety **or security** significance in the inspection report when the agency has not yet reached a conclusion.  
  
**State that the significance determination is preliminary or pending an initial significance characterization.**
- c. The third part **must** include the basis for assigning or not assigning the **CCA**.
- 1. **When** a **CCA** is assigned:
    - (a) For licensee-Identified findings with pending or preliminary significance, state that the assigned **CCA** is dependent on the final significance determination being White, Yellow, or Red.

- (b) Identify which **CCA** described in IMC 0310 best corresponds to the apparent cause or most significant causal factor of the performance deficiency.
  - (c) **Identify the apparent cause or most-significant contributor of the performance deficiency and explain why it best aligns with the assigned CCA.**
  - (d) If assigning a **CCA** 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 **CCA** listed in IMC 0310.
2. **When a CCA is not assigned**, include a statement briefly describing the reason (e.g., not current licensee performance).

06.04 **Enforcement.** **Violations must be dispositioned in accordance with the Enforcement Policy. Document violations and findings without violations as described below:**

**For 10 CFR 50, Appendix B, Criterion XVI violations involving significant conditions adverse to quality and repetition, refer to the Enforcement Manual for additional documentation requirements.**

Document the enforcement attributes of the finding, violation, **or both** as described below:

- a. For a finding without a violation, the enforcement section must include a statement similar to: **“Inspectors did not identify a violation of regulatory requirements associated with this finding.”**
- b. **For violations which do not receive enforcement discretion**, the enforcement section must include the following (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. **Indicate** when estimated or ongoing at time of **the exit meeting**).
  - 3. Any actual or potential safety **or security** consequence.
  - 4. Immediate corrective actions taken to restore compliance **or address any immediate safety or security concerns**. If **any** corrective actions are planned or still being evaluated, **indicate** 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 an NCV (e.g., Green finding), describe the circumstances in accordance with Section 2.3.2.a of the Enforcement Policy.

5. A reference to any established licensee's corrective action program document number.
  6. Specific enforcement actions.
  7. A statement similar to:
    - (a) For NCVs: "This violation is being treated as an NCV, consistent with Section 2.3.2.a of the Enforcement Policy".
    - (b) For AVs: "This violation is being treated as an apparent violation pending a final significance (enforcement) determination".
    - (c) For NOVs: "A Notice of Violation is attached." Also, for NOVs, see the Enforcement Manual for guidance on developing the notice and cover letter.
- c. End the enforcement section with the item type, tracking number, and title (e.g., NCV, FIN (designation for a finding without a violation), AV, or VIO (designation for an NOV) followed by [Docket Number]/[Report Number]-[Unique Sequential Integer], "[Title]"). Refer to IMC 0306 for more information on item types and tracking numbers.  
Examples:

FIN 050000###/2014004-01, "Failure to Remove Plastic Shipping Plug during Rosemount Transmitter Installation"

NCV 050000###/2014007-01, "Failure to Establish Proper Electrical Connections during Main Transformer Maintenance"

Example for Section 08.04: FIN/AV 050000###/2014007-01, "Failure to Obtain Prior Approval for a Change Which Decreased the Effectiveness of the Emergency Plan"

## 0612-07 DOCUMENTING TRADITIONAL ENFORCEMENT VIOLATIONS WITHOUT AN ASSOCIATED FINDING OR ENFORCEMENT DISCRETION USING THE FOUR-PART FORMAT

This section provides instructions for documenting TE violations without an associated finding using the four-part write-up. Refer to Section 0612-09 of this IMC when the violation involves enforcement discretion.

07.01 Introduction. Provide a brief discussion of the TE 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 requirement violated and whether it is an NCV, AV, or NOV.

- b. The SL. For AVs indicate the NRC has not made an enforcement decision.
- c. For SL IV violations, the identification credit (self-revealed or NRC-identified).

07.02 **Description.** Refer to Section 06.02 of this IMC for specific direction.

07.03 **Analysis.** The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at any documented conclusions.

- a. The first part must indicate either why no associated finding exists or identify where the associated finding was previously documented.
  - 1. When no performance deficiency exists, include a statement similar to:  
“The NRC determined that this violation was not reasonably foreseeable and preventable by the licensee and therefore is not a performance deficiency.”
  - 2. When a minor performance deficiency exists, include a statement similar to:  
“The NRC determined this violation was associated with a minor performance deficiency.” Describe as necessary.
  - 3. When the TE violation is associated by common performance deficiency with a previously dispositioned finding, cross reference the tracking number and title description for the related finding that was dispositioned in a previous report.
  - 4. Indicate that CCAs are not assigned to TE violations. Include a statement similar to “Traditional enforcement violations are not assessed for cross-cutting aspects”.
- b. The second part must describe the decision logic used to determine the SL of the violation.
  - 1. Describe why TE is being used to disposition the violation (i.e. willfulness, impacting regulatory process, actual consequence, or a violation without a finding). Include a statement similar to:  
“The ROP’s significance determination process does not specifically consider [willfulness or the regulatory process impact] in its assessment of licensee performance. Therefore, it is necessary to address this violation which [involves willfulness or impedes the NRC’s ability to regulate] using traditional enforcement to adequately deter non-compliance.”
  - 2. Describe the logic used to determine the SL of the violation. Include reference to Enforcement Policy examples. For AVs indicate the NRC has not made an enforcement decision.

07.04 **Enforcement.** Document the remaining enforcement attributes for the violation in accordance with Section 06.04b of this IMC.

Inspection reports 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.

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

This section provides instructions for documenting TE violations with an associated finding in a combined four-part write-up. The combined write-up must be used to document findings and TE violations dispositioned in the same report that are either associated with a common performance deficiency or closely related by cause and effect, or both.

The combined write-up must be used to document findings and TE 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 TE 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.
- c. The identification credit (self-revealed, NRC-identified, or licensee-identified).
- d. The requirement violated and whether it is an NCV, AV, or NOV.
- e. The SL. For AVs indicate the NRC has not made an enforcement decision.

**08.02 Description.** Refer to Section 06.02 of this IMC for specific direction.

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

- a. The first three parts must include the basis for the finding, the logic used to determine the findings significance, and the basis for assigning or not assigning a CCA to a finding. Document the first three parts using Section 06.03 of this IMC.
- b. The last part must include decision logic used to determine the SL of the violation. Document the last part using Section 07.03b of this IMC.

**08.04 Enforcement.** Document the remaining enforcement attributes for the violation in accordance with Section 06.04b of this IMC.

Inspection reports 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.

## 0612-09 VIOLATIONS WARRANTING ENFORCEMENT DISCRETION

This section provides instructions for documenting violations warranting enforcement discretion. Violations that may warrant enforcement discretion (e.g., violations without performance deficiencies) shall be brought to the attention of the Regional Enforcement Coordinator. Refer to Enforcement Manual for additional direction.

Document violations receiving enforcement discretion in accordance with any overriding directions contained in an Enforcement Guidance Memorandum or as directed by the Office of Enforcement. Unless otherwise directed, document violations receiving enforcement discretion under the applicable inspectable area using the two-part write-up below.

- a. Description: The description should be similar description in Section 06.02 of this IMC.
- b. Enforcement: Describe the basis for granting enforcement discretion.
  1. Identify the requirement violated and discuss how it was violated (this requires a “contrary to” statement consistent with guidance in the Enforcement Manual).
  2. Briefly discuss the SL categorization in accordance with the Enforcement Policy. This may additionally include the safety or security significance characterization as appropriate. A detailed analysis is not required.
  3. As appropriate, state why enforcement discretion is being granted. Include a statement similar to “The NRC exercised enforcement discretion (Enforcement Action (EA)-##-###) in accordance with Section [##] of the Enforcement Policy because [reason].”
  4. Provide a reference to the licensee’s corrective action program document number.

Violations that receive enforcement discretion are not assigned an ROP tracking number and are not documented in the Summary. They must be assigned an enforcement action (EA) number which can be obtained through the Regional Enforcement Coordinator. The cover letter must contain the required language used for exercising enforcement discretion.

## 0612-10 UNRESOLVED ITEMS

10.01 Opening. Open an URI 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 URI cannot be used to determine the significance of a finding, to track completion of licensee’s actions associated with a finding, or to determine if enforcement discretion should be granted for a violation. The action of documenting an URI is a commitment of future resources.

Document URIs using the following two-part write-up:

- a. **Introduction:** Provide an introduction for the URI using Section 08.01 of this IMC as a guide.
- b. **Description:** Describe the URI using Section 06.02 of this IMC as a guide. Clearly state that an URI was identified and describe the issue with sufficient detail, so that another inspector could complete the inspection and documentation effort. Describe any corrective actions taken to eliminate any perceived immediate safety or security concerns. Clearly identify the specific licensee or NRC actions needed to resolve the issue. End this section with the item type, tracking number, and title. Example: URI 050000###/2014003-01, "Cable Insulation Resistance during Flooding"

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

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

When the URI results in a finding or violation which must be documented in accordance with Sections 0612-06, 0612-07, 0612-08, and 0612-09 of this IMC, document the closure of the URI in the inspectable area section of the report associated with the sample that led to the URI. Otherwise, document the closure of the URI in report Section 4OA5.

#### 0612-11 CLOSURE OF LICENSEE EVENT REPORTS (LERs)

Document reviews, revisions, and closures of LERs in report 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 report Section 4OA3.

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. Otherwise, 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 Section 0612-14, "Minor Issues and Minor Violations" of this IMC.



- c. Licensee-Identified NCVs. Document in accordance with Section 0612-13, “Licensee-Identified Violations,” of this IMC in report Section 4OA7. Include a statement similar to “The enforcement aspects of this violation are discussed in Section 4OA7” in the LER closeout section under report Section 4OA3.
- d. NRC-Identified or Self-Revealed Findings, Licensee-Identified findings with pending or preliminary significance, or TE Violations which are not Licensee-Identified NCVs. Document using the four part write-up, if not previously documented. Refer to Sections 0612-06, 0612-07, and 0612-08 of this IMC.

## 0612-12 CLOSURE OF CITED VIOLATIONS

After receipt of the licensee’s response to a Notice of Violation and completion of any special and infrequently performed inspections, document the closure of the cited violations in report Section 4OA5 unless otherwise directed. The level of detail required to document closure of cited violations depends on the extent of corrective actions conducted by the licensee. In general, 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 all identified non-compliances to 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 which meet the requirements for an NCV in accordance with Section 2.3.2.a of the Enforcement Policy should receive minimal documentation in report Section 4OA7. These licensee-identified NCVs are not considered during the assessment process to prevent discouraging an aggressive problem identification process.

All other non-minor violations must be documented in accordance with Section 0612-06, 0612-07, 0612-08, or 0612-09.

Include an introductory statement in report Section 4OA7 similar to:

“The following licensee-identified violations of NRC requirements were determined to be of very low safety significance or Severity Level IV and meet the NRC Enforcement Policy criteria for being dispositioned as a Non-Cited Violation.”

For each licensee identified violation documented in report Section 4OA7:

- a. Identify the requirement violated and discuss how it was violated (this requires a “contrary to” statement consistent with guidance in the Enforcement Manual).

- b. Identify when the violation occurred and how long it existed (Use bracketing dates or date and duration. Reflect when estimated or ongoing at time of the exit meeting).
- c. Provide a reference to the licensee's corrective action document number.
- d. For violations of very low safety or security significance (Green), briefly explain why the finding is Green.
- e. For SL IV violations, identify why TE is applicable and briefly describe the SL categorization in accordance with the Enforcement Policy.

#### 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, or URI. When a minor performance deficiency or violation is documented, provide sufficient detail 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 violation.
- b. State the reason why the performance deficiency or TE 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 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 REQUIREMENTS

15.01 Treatment of Third Party Reviews. When reviewing Institute of Nuclear Power Operations (INPO) or other third party evaluations, accreditation reports in accordance with Executive Director of Operations Policy 220, include in report Section 4OA5 a brief statement that the review was completed. Do not include a recounting or listing of INPO conclusions or reference a final INPO rating; discuss the specifics of any significant differences between NRC and INPO perceptions with regional management. Further, INPO related conclusions, recommendations, or corrective actions are not referenced in NRC inspection reports. If an INPO or other third party issue is of such safety significance that it warrants tracking, it should be independently evaluated, inspected, documented, and then tracked as an NRC finding or URI.

INPO conclusions, recommendations, corrective actions, and operating experience which are placed in the licensee's corrective action program, are considered appropriate for inspection.

When documenting review of these issues, inspection reports should **not reference** INPO reports or documents, INPO **designations**, or specific sites **affected by** operating experience. **Referencing the licensee's corrective action program and providing a brief description** (e.g., "Condition Report 235235 concerning industry information on pumps.") **will generally suffice.**

15.02 Non-Routine Inspections. **Results** from IMC 2515 Appendix C inspections, temporary instructions, or other non-routine inspection activities not addressed in this IMC are documented in **report** Section 4OA5. In some cases, factual observations may be documented. If it is necessary to document a minor issue or minor violation, follow the **direction** 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 **direction** for handling of SUNSI is published on the NRC internal **Web** site at <http://www.internal.nrc.gov/sunsi/>.

15.04 Amending Inspection Reports. If it becomes necessary to correct an issued report **for the record**, **revise** the previously issued report and **reissue** it in its entirety under the same inspection report number. The revised report **must** receive a new and unique ADAMS accession number **and must be added into an ADAMS package which contains the original report.** The cover letter **accompanying the reissued report must reference the inspection report it replaces with its associated ADAMS accession number, explain why the report is being reissued, briefly describe the changes, and indicate which section of the report was revised.** **The cover letter does not need to reiterate information previously communicated.** Changes which affect the Action Matrix or Cross-cutting Issues **must** be coordinated with the Performance Assessment Branch (IPAB). After the report is revised, the responsible branch should update the Reactor Program Systems (RPS) database as appropriate and contact the IPAB lead for IMC 0305, "Operating Reactor Assessment Program" to initiate any required public web page updates **in accordance with IMC 0306, "Information Technology Support for the Reactor Oversight Process."** 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.

15.05 Plain Language. **Use** plain language in reports. For additional **direction** refer to NUREG-1379, "NRC Editorial Style Guide."

15.06 Documenting Multiple Examples of a Finding. Multiple examples of the same performance deficiency that share the same cause and require the same corrective actions shall be documented as a single finding. Note that each example must be able to stand alone as a finding. Do not use the number of finding examples to aggregate the significance; base the significance off the most significant example.

Provide an accounting of the examples after stating the performance deficiency in Section 06.03a.1.

## 0612-16 COMPILING AN INSPECTION REPORT

Include in each inspection report a cover letter, cover page, summary, report details, and attachments with supplemental information as described in this section. A table of contents or summary of plant status may be provided. A standard inspection report outline is shown in Exhibit 1, "Standard Reactor Inspection Report Outline." 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 communicate the overall inspection results and 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. Refer to Exhibit 2, "Inspection Report Documentation Matrix," Exhibit 4, "ROP Inspection Report Cover Letter Templates," and Management Directive 3.57, "Correspondence Management" for additional requirements. Guidance and cover letter formats for communicating enforcement actions vary and are found in the Enforcement Manual, Appendix B.

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. A table of contents is optional. Develop a table of contents if a report is considered complicated or of significant length.

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 Reactor Program Systems (RPS) Plant Issues Matrix (PIM).

- a. The first paragraph of the summary section is used to describe the inspection report.

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 **address** 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 the reason why the identified More-than-Minor screening question was answered "yes,"** 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. **Include** a Summary of Plant Status section, **if appropriate**. **Briefly** describe pertinent operational events **and plant status**, such as **significant planned and**

unplanned transients or power changes, unplanned system actuations, or degraded conditions which significantly affect operations. This summary is not needed for some inspections since plant operating status may not be relevant.

#### 16.06 Report Details.

- a. Report Outline. Arrange the report details in accordance with the standard report outline shown in Exhibit 1. 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 (e.g., findings, violations, and URIs) are placed in the corresponding section of the report.

In cases where a standard format is not readily applied, identify the most important subject 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 directed focus of the inspection does not easily fit into the standardized report outline (e.g., license renewal inspections)

Section 4OA5 of the inspection report should be used to document the following:

- A finding or TE 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.
- 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). Include an Inspection Scope and a Findings section in each inspectable area as described below:
    1. Inspection Scope Section. The scope must:
      - (a) Identify the methods of inspection. Methods can include a walk-down, in-office review, observation of test from the control room, discussion with specific personnel, or participation in an exercise.
      - (b) Identify what was inspected and samples completed. Include how many samples were completed.
      - (c) Identify the inspection objectives and the criteria that were used to determine whether the licensee was 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 **site** (e.g., an **off-site vendor** review), then identify where the inspection took place.

2. **Findings Section.** Document **findings** and **violations** 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,” **0612-08**, “Documenting Traditional Enforcement Violations and Findings Using a Combined Four-Part Format,” or **0612-09**, “**Violations Warranting Enforcement Discretion.**” Document each URI in accordance with Section **0612-10** “Unresolved Items.” Present the findings and 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.

**Assign all** findings (FINs), violations (VIOs), non-cited violations (NCVs), apparent violations (AV), and unresolved items (URIs) 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.

Photographs of plant areas or equipment or photocopies of technical or vendor manual pages must be handled in accordance with IMC 0620, “**Inspection Documents and Records.**” **When including graphics, the following should be considered:**

1. **Format as** a jpeg and **adjust** size (height, width, and resolution) so as not to significantly increase overall file size.
2. **Locate on less than ½** page, or put in **an** attachment.
3. Center on page and left/right indented from the text.
4. **Include** 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 **for each** exit meeting **related to report inspections** in Section 40A6. **The summary must identify the most senior licensee manager who attended the exit meeting and should** include the following information:



- a. Proprietary Information. Confirm with the licensee at the exit meeting that the NRC has (or has not) returned any proprietary materials used during the inspection (Refer to IMC 2515, Section 12.01 and IMC 0620 for further direction).

If proprietary information was not retained, use a statement similar to:

"The inspectors verified no proprietary information was retained or documented in this report."

If proprietary information was retained, use a statement similar to:

"The inspectors confirmed that proprietary information was controlled to protect from public disclosure."

**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. Document the additional exit meeting in the inspection report Section 4OA6.
- c. Licensee's Exit Meeting Response. 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. If the licensee disagrees with an inspection finding, this position may be characterized by the licensee in its formal response to the inspection report.

16.08 Report Attachments. Include the attachments discussed below at the end of the inspection report when applicable to the inspection. The attachments may be combined into a single attachment entitled "Supplemental Information."

- a. Report Items for RPS. Always include a list of items opened, closed, and discussed. For each listed item, include the item type, tracking number, and title (used in PIM headers describing the item). Include open items that were discussed and not closed with a reference to the sections in the report or other reports 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, 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 does not need to be exhaustive but should identify individuals who provided information related to developing and understanding findings. Include the most senior licensee manager present at the exit meeting.
- c. Documents Reviewed. A list of the documents and records reviewed during an inspection must be publicly available for publicly available inspection reports. The list does not need to include those reviewed documents and records already identified in

the body of the report nor those determined not to support the inspection scope and determinations.

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

Note: Inspection reports should not reference INPO reports or documents. If it is absolutely necessary to document review of an INPO document (e.g., an evaluation referring to the INPO document was an inspection sample or justification for a finding) after considering Section 15.01 of this IMC, 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. Spell out acronyms when first used in inspection report text (e.g., Reactor Oversight Process (ROP)). Optionally, include a list of acronyms in the inspection report or reference. When referencing, make the list of acronyms available to the public for publicly available reports.

## 0612-17 ISSUING INSPECTION REPORTS

- 17.01 Report Timeliness. Most inspection reports, including special inspections, should be issued no later than 45 calendar days after inspection completion. AIT reports must be issued no later than 30 calendar days after inspection completion.

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

### 17.02 Release and Disclosure of Inspection Reports.

- a. General Public Disclosure and Exemptions. Except for report enclosures containing exempt information (Refer to IMC 0620), all non-security cornerstone inspection reports will be routinely disclosed to the public.
- b. Security Cornerstone Inspection Reports. Security cornerstone inspection reports will not be made available to the public. However, security cornerstone inspection reports cover letters will be made available to the public. 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 (OUO – SRI) based on the level of information contained in them.

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 SGI are in Management Directive 12.6, "NRC Sensitive Unclassified Information Security Program," and the requirements for marking OUO -SRI 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 **shall** not release either the investigation report or **their** individual input to the investigation report **to the public**. 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 Reports]  
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: **Minor / More-than-Minor Screening Examples**  
Appendix G: **Emergency Planning Cornerstone-Specific Supplemental Guidance for Appendix B Screening Figures 1 and 2**  
Appendix H: **[Reserved for Security Cornerstone Minor / More-than-Minor Screening Examples]**

END

Attachment 1 – Revision History for IMC 0612

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	01/06/00 <a href="#">CN 00-021</a>	Initial issue of IMC 0610*		
	02/27/01 <a href="#">CN 01-005</a>	IMC 0610* was revised to incorporate revisions to Physical Protection Group Two Questions, in concert with issuance of the interim Physical Protection SDP. Also minor revisions were added to: address treatment of third party reviews, clarify guidance on writing inspection summaries, provide several examples of maintenance findings, and make several administrative revisions.		
N/A	<a href="#">ML021280215</a> 04/29/02 <a href="#">CN 02-021</a>	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

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
N/A	<a href="#">ML031610632</a> 06/20/03 <a href="#">CN 03-021</a>	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	<a href="#">ML040150518</a> 01/14/04 <a href="#">CN 04-001</a>	Changed the inspection report timeliness to 45 calendar days for most inspection reports, including Special Inspections.	None	N/A
N/A	<a href="#">ML052700137</a> 09/30/05 <a href="#">CN 05-028</a>	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	02/10/06	Revision history reviewed for the last four years.	N/A	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
N/A	<a href="#">ML061300434</a> 06/22/06 <a href="#">CN 06-015</a>	<p>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).</p> <p>Enhancing the ROP to more fully address safety culture (SRM 04-0111).</p> <p>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.</p>	Yes 07/01/06	<a href="#">ML061510135</a>
N/A	<a href="#">ML063000257</a> 11/02/06 <a href="#">CN 06-033</a>	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	<a href="#">ML063000483</a>
N/A	<a href="#">ML070720191</a> 09/20/07 <a href="#">CN 07-029</a>	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	<a href="#">ML071560246</a>
N/A	<a href="#">ML082270500</a> 12/04/08 <a href="#">CN 08-034</a>	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	<a href="#">ML083220722</a>

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	<a href="#">ML091590492</a> 04/30/10 <a href="#">CN 10-013</a>	<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	<a href="#">ML091480470</a>

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	<a href="#">ML12058A229</a> 07/10/12 <a href="#">CN 12-014</a>	<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	<a href="#">ML12128A372</a> 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



Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	<a href="#">ML12244A483</a> 01/24/13 <a href="#">CN 13-003</a>	<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. 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	<a href="#">ML12293A326</a> Closed FF: 0612- 1802 & 1807
	ML13058A316 05/06/16 CN 16-012	<ul style="list-style-type: none"> <li>• Clarified licensee-identified, self-revealed, and NRC identified definitions. Added “failed on demand testing” to self-revealed examples.</li> <li>• Added direction on how to document multiple examples of the same finding.</li> <li>• Added a requirement to document when the violation occurred and how long it existed for Section 4OA7 NCVs.</li> <li>• Clarified definition of performance deficiency (application or meaning not changed see IMC 0308 Att 3 for basis).</li> <li>• Aligned finding summary and 4 part write-up requirements to eliminate inconsistencies.</li> <li>• Specified existing requirement to document performance deficiency screening when documenting a TE violation without a finding.</li> </ul>	None	<a href="#">ML15229A315</a>  Closed FF: 0612-1530, 1555, 1684, 1900, 1917, 1954, & 2152  April 2015 DDCM Action Items 25 & 26

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
		<ul style="list-style-type: none"> <li>• Removed replicative cover letter directions already included in IMC 0612 Exhibit 4.</li> <li>• Enhanced direction for amending inspection reports.</li> <li>• Added direction for retaining proprietary information.</li> <li>• Added direction not to communicate regulatory determinations or actions that have not been established in accordance with applicable processes.</li> <li>• Removed requirement to list more than six documents reviewed in a sample in the report attachment.</li> </ul>		