NRC INSPECTION MANUAL

IRIB

INSPECTION MANUAL CHAPTER 0801

INSPECTION PROGRAM FEEDBACK PROCESS

Effective Date: 01/01/17

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0801-01 PURPOSE

This chapter describes the feedback process used by the Office of Nuclear Materials Safety and Safeguards (NMSS), Office of New Reactors (NRO), Office of Nuclear Reactor Regulation (NRR), and the Office of Nuclear Security and Incident Response (NSIR) to identify and resolve problems, concerns, or difficulties encountered in implementing the inspection programs of the Nuclear Regulatory Commission (NRC).

0801-02 OBJECTIVES

The NRC encourages the staff to identify issues that need program-level attention and to suggest changes to improve the effectiveness or implementation of the Agency inspection programs. Feedback Forms are the vehicle used to suggest such changes. Although feedback is expected to come mostly from staff who implement the agency's oversight programs, any NRC employee may use the processes described below to make suggestions or recommendations regarding the inspection programs.

0801-03 APPLICABILITY

All NRC employees who have concerns or wish to provide feedback regarding any aspect of inspection or oversight, for NMSS, NRO, NRR, and NSIR program areas, including interfaces with enforcement, and/or training programs shall follow the procedures outlined in section 0801-07 of this inspection manual chapter (IMC).

The Feedback Form is the formal mechanism for initiating a change to an inspection program document. Revisions to inspection documents should be made using this process, even when changes to inspection documents are the result of a working group, white paper, or industry comments. The process described herein is used to collect and manage feedback on all NRC inspection or oversight programs, including the Reactor Oversight Process (ROP) Performance Indicator Program. However, the process for resolving interpretations of performance indicators is described in IMC 0608, "Performance Indicator Program."

0801-04 DEFINITIONS

04.01 Feedback Form (FBF). A formal mechanism to provide input, suggestions, or recommendations to Document Leads regarding inspection program implementation. Feedback Forms may be designated as either short-term or long-term based on the complexity of the issue or topic identified.

04.02 Short-Term Feedback (STF). An issue identified in a FBF which allows the resolution to be addressed and answered within a six-to twelve month time frame. Editorial comments would fall under the definition of short-term resolution that can be addressed, the document can be revised, and issued within the six month time frame. If multiple inspection program documents are affected by a single short-term FBF, the goal is to have all affected documents revised within a six to twelve month period.

04.03 Long-Term Feedback (LTF). An issue identified in a FBF which will require a twelve month time frame or longer. These types of resolutions will impact other program guidance as well as the inspection framework. Examples of long-term feedback include substantive policy related issues that will require coordination with affected stakeholders, such as regional staff and multiple program offices, and may also include senior leadership, Commission-level interaction, or both.

0801-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Director, Division of Inspection and Regional Support, (DIRS). Establishes the policy of and monitors the timely execution and effectiveness of the inspection program feedback process.

05.02 Division Directors, NMSS, NRO, NRR, NSIR and Regions. Support the timely execution and effectiveness of the inspection program feedback process.

05.03 Chiefs, Performance Assessment Branch/Reactor Inspection Branch (IPAB/IRIB), NRR. Manage the feedback process for the ROP. Schedule and conduct periodic meetings with staff to establish priorities of new FBFs received, review the status of open FBFs, and adjust priorities accordingly in order to meet the timelines goals specified in Section 0801-06. Convene the Feedback Form Review Panel to reach alignment on the resolution of LTFs. Ensure the final resolution of feedback is approved by the cognizant technical branch chief or designated official. Approve inspector training as appropriate.

05.04 Chiefs, Inspection Program Branches in NMSS, NRO, and NSIR (Supervisors of Document Leads). Manage the feedback process in their respective inspection programs. Schedule and conduct periodic meetings with staff to establish priorities of new FBFs received, review the status of open FBFs, and adjust priorities accordingly in order to meet the timelines goals specified in Section 0801-06. Request that the Feedback Form Review Panel be convened to reach alignment on the resolution of LTFs. Approve inspector training as appropriate.

05.05 Feedback Form Review Panel. Panel convened and chaired by the Chief, IPAB or IRIB, to reach alignment on the proposed resolution of LTF. The Feedback Form Review Panel is comprised of the Document Leads, Regional Technical Support Branch Chiefs (or Team Leaders), and cognizant Technical Branch Chiefs. The Panel adheres to timeliness goals specified in Section 0801-06.

05.06 Chiefs, Technical Branches, NMSS, NRO, NRR, or NSIR. Review, approve, or reject FBFs. Participate in Feedback Form Review Panel when requested.

05.07 Originator of Feedback Forms. Fills out sections A – E of the FBF to identify problems, concerns, or difficulties encountered when implementing an inspection manual chapter(s) (IMCs), or inspection procedure(s) (IPs). Whenever possible, contacts the Document Lead prior to submitting an FBF.

05.08 Supervisors of Originators of Feedback Forms. Review, approve, or reject FBFs. If approving an FBF, add any necessary comments, and submit the FBF to the NRR Inspection Manual Coordinator. When necessary, request that a Feedback Form Review Panel be convened.

05.09 NRR Inspection Manual Coordinator. Receives and assigns FBFs to the appropriate Document Leads. In coordination with the cognizant inspection program Branch Chief, updates assignments during Document Lead turnover. Processes and uploads the FBF into ADAMS upon closure.

05.10 Document Lead. Periodically monitors the status of assigned open FBFs to ensure the timeliness goals specified in Section 0801-06 are being met. Reviews and determines the best approach to address and disposition the issue(s) identified in the FBF. Prioritizes the proposed resolution of feedback with supervisor input. Ensures that the final resolution of feedback is consistent with overall inspection program policy and framework. Proposes a resolution path for LTF submitted to the Feedback Form Review Panel. Documents the basis for resolution of the feedback in the FBF and obtains supervisor approval. Submits completed FBF to Inspection Manual Coordinator for processing. When resolution of a FBF entails a revision of an IMC, or IP, identifies and coordinates any changes or revisions to affected inspection manual document(s) with stakeholders and includes the FBF(s) being closed in the document issuing package that is submitted to the Inspection Manual Coordinator, in accordance with IMC 0040, “Preparing, Revising, and Issuing Documents for the NRC Inspection Manual.”

0801-06 INSPECTION PROGRAM FEEDBACK PROCESS TIMELINESS GOALS

If after a conversation or e-mail exchange with the document lead the issue remains unclear, or existing guidance is inadequate, an FBF should be submitted to your supervisor (branch chief or above) to clearly identify problems, concerns, or difficulties encountered in implementing the affected IMCs or IPs.

The NRR Inspection Manual Coordinator will send an initial receipt of an FBF e-mail to the originator, the Document Lead and their respective supervisors.

The timeliness goal for closure of STFs is six to twelve months from the time the FBF is received by the Inspection Manual Coordinator. The timeliness goal for closure of LTFs is twelve months from the time the FBF is received by the Inspection Manual Coordinator, but it can be greater than twelve months, based on the issue raised in the FBF.

If a Feedback Form Review Panel is convened to address an LTF, the panel will reach a decision on the matter within one month from the date the panel is convened. It is acknowledged that in some circumstances this timeline may not be plausible or feasible. In these cases, the panel will decide whether a new approach for a resolution needs to be developed (i.e. consider creating a focus group), and may establish a new deadline, taking into consideration the impact of the delay on overall inspection program implementation.

Inspection program document revisions initiated as a result of the FBF process will be completed within twelve months from the closure of the FBF, to the greatest extent possible, and will become effective on the first day of the next inspection cycle, unless earlier implementation is necessary and practical.

0801-07 INSPECTION PROGRAM FEEDBACK PROCESS

FBFs for all inspection programs (NMSS, NRO, NRR, NSIR) will be sent to the NRR Inspection Manual Coordinator, through the ROP_Feedback.Resource@nrc.gov e-mail address, who will coordinate with the other program offices. Whenever possible, staff is encouraged to contact the Document Lead prior to submitting an FBF. (Document leads can be found on the ROP Digital City web page, under "Communications and Training," by clicking on "Document Lead.") If after a conversation or e-mail exchange with the document lead the issue remains unclear, or existing guidance is inadequate, an FBF should be submitted. The feedback process is depicted in Exhibit 2, "Inspection Program Feedback Process Flow Chart,"

07.01 Feedback Form Originator (Sections A through E):

a. Find the FBF template in ADAMS (ML16347A075).

b. Fill out the FBF by documenting the issue and any proposed recommendations on the FBF. Forward the FBF to supervisor for review and approval. Resolve any comments made by the supervisor and return the FBF for his/her approval.

07.02 Feedback Originator Supervisor (Section F):

Review and approve or rejects the FBF. If the FBF needs clarification, the supervisor e-mails the form back to the originator for edits. Once the supervisor approves the FBF, he or she forwards the FBF to ROP_Feedback.Resource@nrc.gov. (If the supervisor rejects the FBF, he or she explains to the originator the basis for the rejection.)

07.03 NRR Inspection Manual Coordinator (Section G):

a. Receive a FBF from the originator's supervisor and enters it into the Inspection Program feedback database to assign a unique tracking number.

b. Transmit the FBF to the Document Lead, originator, and originator's supervisor within ten (10) business days of receipt.

c. Post open FBF on the Inspection Program Feedback Forms SharePoint site.

d. Maintain the inspection program feedback database.

e. Provide status reports to management and staff when requested.

f. Post status reports to the Inspection Program Feedback Form SharePoint Page.

07.04 Document Lead (Section H):

a. Review the FBF, contacts the originator, early in the process, with a potential draft response, and works with the originator to fully understand the feedback. The draft response should describe how the Document Lead intends to address the issue if accepted, or provide an explanation why the recommendation may not be accepted, and the FBF rejected. The draft response is added to the Inspection Program Feedback Forms Share Point page by the Document Lead. (For Performance Indicator-related feedback, follows the process in IMC 0608, "Performance Indicator Program," for resolving performance indicator interpretation issues.)

b. Categorize the FBF as STF, or LTF. The draft response may include a possible date that the changes will be incorporated in any program documents affected. (For PI feedback, follows the process in IMC 0608, "Performance Indicator Program," for resolving performance indicator interpretation issues.)

c. Discuss FBF issues with supervisor, to confirm categorization and priorities. Updates the FBF on the Inspection Program Feedback Forms SharePoint page, and contacts the originator to discuss and/or propose an alternative solution, as necessary.

d. If the proposed resolution is categorized as LTF, recommend that a Feedback Form Review Panel be convened.

e. Forward the Feedback Form to the appropriate branch chief for review.

f. If an approved Feedback Form generates the need for changes to inspection program documents, follows the process outlined in IMC 0040, Section 0040-06, "Document Preparation and Processing."

07.05 Document Lead's Supervisor (Section H):

a. Provide input regarding prioritization of FBFs.

b. Regularly review open FBFs on the Inspection Program Feedback Forms Share Point page and contact the Document Lead regarding any processing delays, and decides if work should be reprioritized as appropriate. Ensure that Document Leads address FBFs so as to meet the timeliness goals specified in section 0801-06.

c. Perform final review on closure for all feedback, including its incorporation into program documents. Recommend inspector training, as appropriate.

d. For LTF, requests that a Feedback Form Review Panel be convened.

07.06 Feedback Form Review Panel (Section I):

a. Meet to reach alignment of the resolution of FBFs designated as LTF.

b. Discuss the issue(s), to reach alignment towards resolution.

c. Make a decision within one month of the Panel's initial meeting, or establishes a new deadline to reach resolution.

d. Panel Chair, or designee, document the decision on the FBF.

0801-08 REFERENCES

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

IMC 0307, "Reactor Oversight Process Self-Assessment Program"

IMC 0307 Appendix A, "Reactor Oversight Process Self-Assessment Metrics"

IMC 0307 Appendix B, "Reactor Oversight Realignment"

END

Exhibit 1: INSPECTION PROGRAM FEEDBACK FORM

Feedback Form No.{C1}	(provided by IRIB)

INSTRUCTIONS:
Each feedback form should address only one (1) issue. Originator: Complete Sections A through E and email form to your supervisor. Supervisor: Complete Section F; then email to the **ROP_Feedback.Resource@nrc.gov** e-mail address and originator.

{A1} **SECTION A: NUMBER AND TITLE**	
(Enter the Number, Title, and Issue Date of the Inspection Manual Chapter (IMC), Inspection Procedure (IP), or Performance Indicator (PI).	
IMC/IP Number & Title	
Issue Date	
Performance Indicator Flag (i.e. MS01):	

{A2} **SECTION B: TOPIC** (Select all topic areas which apply.):							
Inspection	☐	SDP	☐	PIs	☐	Training	☐
Assessment	☐	Enforcement	☐	Other	☐	X-Cut Issue	☐

{A3} **SECTION C: SUMMARY OF ISSUE/PROJECT RELATED ISSUE**
(Identify the specific IP or IMC section to which the feedback issue applies. Summarize the concern or issue in one or two sentences.)
Summary of Issue:
Or Related Project Issue: (for example, "2014 Fort Calhoun Lessons Learned." Add ML number if applicable.)

[Feedback Form Template: ML16347A075]

{A4} **SECTION D: COMMENT(S)/RECOMMENDATION(S)**
(Describe the issue and the impact to the IP or IMC and other related program documents (if known). If the description includes an excerpt from another document, check in the box below and attach to the end of the feedback form, only the portion of the document that pertains to the issue. Provide recommendation(s) and suggested resolution(s) for the issue. Include in the recommendation if resources to implement the change will be impacted and how. Indicate whether training would be part of the solution. If describing a PI interpretation issue: 1) state the licensee's interpretation, 2) state the region's position, and 3) provide any recommendation(s), if appropriate).
Comment(s):
Recommendation(s):
Do you think training is part of the solution? Yes ☐ No ☐ ☐ Check here if additional documentation is added to communicate this request. Insert pages at the end of this feedback form. (Include only the relevant portions of a document.)

{A5} **SECTION E: ORIGINATOR SUBMITTAL INFORMATION**	
Name:	
Email:	
Phone No:	
Plant Name or Region:	
Date submitted to Supervisor:	
Supervisor's Name:	
Supervisor's Email:	

{B1} **SECTION F: SUPERVISOR' REVIEW**
Supervisor's Remarks (mandatory): Supervisor: Date:
{B2} (Review sections A-E; add your remarks; and email to **ROP_Feedback.Resource@nrc.gov**. If request is urgent, state justification.)
{B3} If this request is **URGENT** to require a change to the regularly scheduled revision of the inspection manual document, **check here** ☐ If **yes**, state reason for urgency: _____

{C2} **SECTION G: DOCUMENT LEAD ASSIGNED**
(The Lead Reviewer reviews the feedback and recommends to accept or reject the feedback recommendation.)

Assigned to: _____ (Lead Reviewer) Branch: _____ Office _____ Phone No: _____ (Other than NRR)

Date Lead Reviewer Received Feedback Form:	
Date Inspection Manual Coordinator Acknowledged Receipt to Originator:	
Date Lead Reviewer Completed the Feedback Form	

{D1} **SECTION H: DOCUMENT LEAD RESPONSE:**
(Potential Initial Responses to Originator) Contacted Originator (and their Branch Chief, if necessary) with response. Date: _____ Agree with Change Recommended: ☐ Yes ☐ No ☐ Partially accepted/denied recommendations (see response below) ☐ Duplicate issue addressed in previous feedback form. (Form #: _____) Will not proceed with FBF. ☐ Not in accordance with current ROP. Will not proceed with FBF. ☐ Short-term resolution. Issue can be resolved in next IMC/IP revision. Tentative issue date: _____ ☐ Long-term resolution. Major re-write/research needed. Submit to Feedback Form Review Panel for resolution.
(Detailed Response to Originator) Training Recommended: Yes ☐ No ☐
{D2} **Document Lead Supervisor Response:**

Document Lead Supervisor: _____	Date:
{C3} Date Inspection Manual Coordinator Updated Originator of Feedback Status	
{C4} Feedback Form Closed in Database due to: ☐ form withdrawn ☐ form denied ☐ issue resolved with CN	(insert date here) (insert CN # here)
{C5} Date Revised Document Issued (if applicable)	

{E1} **SECTION I: HEADQUARTERS COMPLETION TRACKING**	
(The ROP feedback form is closed if a) the form is rejected, b) the resolution does not affect the program document, or c) after the comments or suggestions are incorporated into a program document. If the feedback form is not rejected it will remain open, and tracked until the revised document is issued. The approved feedback form comments will be incorporated in the revised inspection manual chapters and procedures.)	
Feedback Form Review Panel Decision:	
Feedback Form Review Panel Chair: _____	Date:
{C3} Date Inspection Manual Coordinator Updated Originator of Feedback Status	
{C4} Feedback Form Closed in Database due to: ☐ form withdrawn ☐ form denied ☐ issue resolved with CN	(insert date here-if rejected) (insert CN # here)
{C5} Date Revised Document Issued (if applicable)	

Feedback Form Completion Instructions

Feedback Form Originator:
A1: Section A: Number and Title: Complete the IMC/IP Number and Title, the Issue date of the last revision, and the Performance Indicator Flag (if necessary)

A2: Section B: Topic: Select all topics that apply (can choose multiple topics if necessary)

A3: Section C: Summary of Issue: Summarize the issue in a few sentences. If there is a related project, or initiative, include that in the appropriate box (such as "2014 Ft. Calhoun Lessons Learned" and the appropriate report accession number).

A4: Section D: Comment(s)/Recommendation(s): Add more details about the issue, (from the summary on the first page) and then include your recommendations to resolve the issue. Check the "Yes" box if you believe that training is necessary, and check the box at the bottom of the page if you have included additional documentation.

A5: Section E: Originator Submittal Information: Include your name, e-mail address, phone number, plant name or Region, and the date submitted to your supervisor. List your supervisor's name and e-mail address.

Originator's Supervisor:
B1: Section F: Supervisor's Review: The originator's supervisor provides comments regarding agreement or disagreement to the suggested changes, then types his/her name on the "Supervisor" line and adds the date.

B2: After reviewing Sections A-E, adding comments and signing, send the feedback form as an attachment to: ROP_Feedback.Resource@nrc.gov.

B3: If the request is urgent, check the "Yes" box and state the reason for the urgency.

Inspection Manual Coordinator:
C1: Feedback Form Number: is assigned by the Inspection Manual Coordinator once the feedback form is received.

C2: Section G: Lead Reviewer Assigned: Insert the name of the Document Lead (Lead Reviewer), his/her branch (and office if necessary), and their phone number. Include the date that the Lead Reviewer receives the Feedback Form, and the date the Inspection Manual Coordinator acknowledged receipt of the Feedback Form to the originator. (Until the feedback form is closed, leave the "Date Lead Reviewer Completed the Feedback Form" blank.)

C3: Section I: Enter the date the originator is informed of the feedback form status.

C4: Section H or Section I: Check the appropriate box, and enter the date the form was "withdrawn", "denied" or "issue resolved with CN". Include the Change Notice number in the appropriate field to the right.

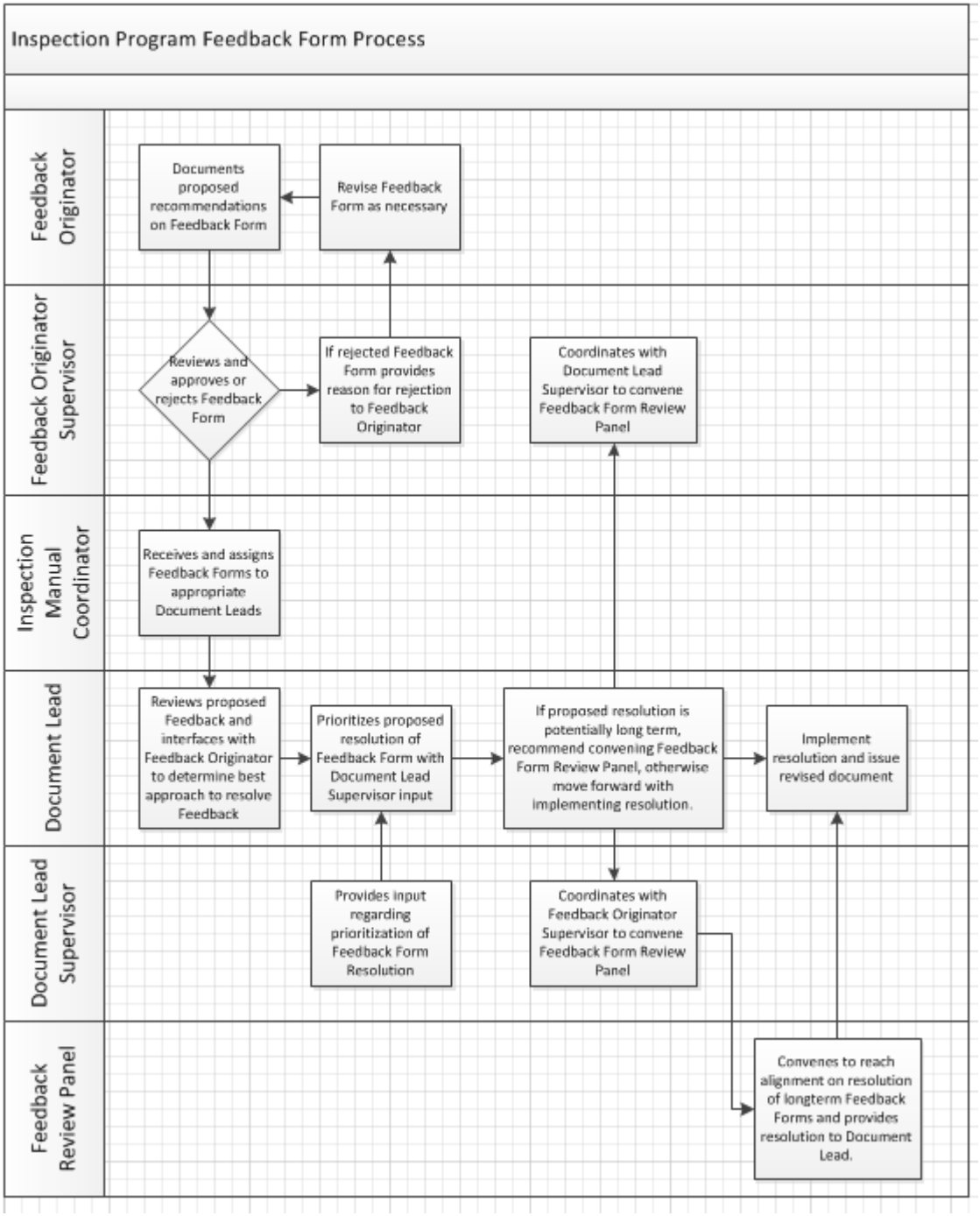
C5: Enter the issue date of the revised document.

Document Lead Response:
D1: Enter the date the originator was contacted with an initial response, and whether or not you agree with the recommended change(s). Check one of the applicable boxes – either the document lead will accept and proceed with the feedback form or they will choose to reject it. If the document lead chooses to address and process the feedback form, indicate whether it will it be short-term or long-term. Provide a detailed response in the "Detailed Response to Originator" section.

Document Lead Supervisor Response:
D2: Section H:
The document lead's supervisor provides comments regarding agreement or disagreement to the resolution, then types his/her name on the "Supervisor" line and adds the date.

Feedback Form Review Panel Chair:
E1: Section I: Sign the feedback form and enter the date. Add any necessary remarks.

Exhibit 2: Inspection Program Feedback Process Flow Chart



ATTACHMENT 1 - Revision History - IMC0801

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public)
N/A	01/01/83	Initial issuance. Commitments reviewed for the last four years and found none.	None	N/A
N/A	ML020710803 03/05/02 CN 02-007	Revised to reflect significant changes in the agency's oversight process and associated programs that have occurred since its last issuance on 01/01/83. This revision captures the feedback process associated with implementing the Reactor Oversight Process. It also describes in detail the feedback process and the role of those individuals with responsibility for reviewing and closing out feedback issues. This IMC includes an attachment that will be used to document feedback concerns.	None	N/A
N/A	ML050340589 01/27/05 CN 05-004	Revised so IIPB receives copies of all Feedback Forms concurrently with regional management via PIPBCAL. The feedback form (Exhibit 1) was revised to reflect this change and enhance the documentation and submission of issues and concerns. Enhancements were also made to improve the tracking of the resolved feedback forms until the revised document is issued.	None	N/A
N/A	ML053350126 03/13/06 CN 06-006	Revision updates position titles as per the NRR reorganization and incorporates assigning a high, medium, or low priority to the Feedback issue. Completion of priority are to be as follows: A high priority will be completed immediately, a medium priority will be completed within 90 days, and low priority within 180 days.	None	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public)
N/A	ML062840390 10/19/06 CN 06-028	Revision introduces use of the NRR Work Planning Center to assign TAC number and assign task to reviewer using the Work Planning and Characterization Form.	None	N/A
N/A	ML081360132 07/01/08 CN 08-019	Revised to more efficiently use TAC numbers for management of the feedback process and to comply with the formatting requirements of IMC 0040.	None	N/A
N/A	ML100840015 07/06/10 CN 10-015	Publish timelines on SharePoint to communicate tentative schedule for annual revision of documents associated with ROP feedback forms. The feedback form is revised to facilitate editing and adding attachments. Policy is changed to require supervisor approval before feedback form is transmitted to IRIB.	None	ML101810505
N/A	ML13219A209 08/08/13 CN 13-016	This revision incorporates use of the ROP Feedback Forms SharePoint site, as well as changes in signature requirements, and additional information from the program office about contacting the originator in a timely manner.	n/a	
	ML15147A104 12/19/16 CN 16-034	This revision expands the roles and responsibilities section, includes timeliness goals for closure of feedback forms, and expands the feedback from process to all Agency inspection programs.	n/a	ML15147A116