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Description

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NRC INSPECTION MANUAL

DIRS

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6600 Reserved

6700 Reserved

6800 Reserved

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69021	Reserved for Inspections of Quality Assurance Program Implementation During Construction of Radioisotope Production Facilities
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70302	Preoperational Test Program Implementation 10/01/83 (reactivated 08-032)
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70305	Reactor Protection System Test Preoperational Test Procedure Review Preoperational Testing Procedure Verification 01/01/79 (reactivated 08-032)
70306	Loss of Offsite Power Test - Preoperational Test Procedure Review 01/01/79 (reactivated 09-003)
70307	Containment Integrated Leak Rate Test - Procedure Review 03/07/86 (86-13)

70308	Preoperational Hot Functional Testing - PWR Procedure Review) 10/01/83 (reactivated 08-032)
70311	Preoperational Testing Procedure Verification 10/01/83 (reactivated 08-032)
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70314	HFT Witnessing 10/01/81 (reactivated 08-032)
70315	Engineered Safety Features Test Preoperational Test Witnessing) 01/01/79 (reactivated 08-032)
70316	Loss of Offsite Power Test Preoperational Test Witnessing 01/01/79 (reactivated 08-032)
70317	Reactor Protection System Test Preoperational Test Witnessing 01/01/79 (reactivated 08-032)
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70325	Preoperational Test Results Evaluation - Reactor Protection System 01/01/79 (reactivated 08-032)
70326	Preoperational Test Results Evaluation - Loss of Offsite Power 01/01/79 (reactivated 08-032)
70329	Preoperational Test Result Evaluation Verification 10/01/83 (reactivated 08-032)
70331	Vibration Test- Preoperational Test Procedure Review 01/01/79 (reactivated 09-003)
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70333	Chemical Control System Test - Preoperation Test Procedure Review 01/01/79 (reactivated 09-003)
70334	Engineered Safety Features Act. System Test - Preoperational Test Procedure Review 01/01/79 (reactivated 09-003)
70335	Safety and Relief Valve Test - Preoperational Test Procedure Review 01/01/79 (reactivated 09-003)
70336	Residual / Decay Heat Removal System Test - Preoperational Test Review 01/01/79 (reactivated 09-003)
70337	Main Stream Isolation Valve Test - Preoperational Test Procedure Review) 01/01/79 (reactivated 09-003)
70338	Auxilliary Feedwater System Test -Preoperational Test Procedure Review 01/01/79 (reactivated 09-003)
70339	Component Cooling Water System Test - Preoperational; Test Procedure Review 01/01/79 (reactivated 09-003)
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70341	Emergency/Standby Power Supply System Test - Preoperational Teat Procedure Review 01/01/79 (reactivated 09-003)
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70349	Reactor Coolant Leak Detection System Test - Preoperational Test Procedure Review 01/01/79 (reactivated 09-003)
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70432	Control Rod System Test - Preoperational Test Witnessing 01/01/79 (reactivated 09-003)
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70434	Engineered Safety Features Act. System Test - Preoperational Test Witnessing 01/01/79 (reactivated 09-003)
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7700 Reserved

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79504 Reserved for Part 52 Plant systems Affecting Plant Water Chem.

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80211 Reserved for Part 52 Environmental Protection - Initial & Periodic
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81023	Reserved for Part 52 Security Organization
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IRIB

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0040-01 PURPOSE

01.01 Inspection Manual Chapter 0040 establishes the basic requirements and format for preparing and obtaining comments on the U.S. Nuclear Regulatory Commission (NRC) Inspection Manual (Manual), including Manual chapters, inspection procedures, temporary instructions, and Operating Experience Smart Samples.

01.02 Instructions are provided on how to prepare appendixes, attachments, tables, figures, and other material for Manual documents.

01.03 Responsibilities and authorities for preparing, issuing, and revising documents for the Manual are specified.

01.04 Processes are established to prepare, revise, and issue Manual documents, including those used by the various NRC Offices that conduct inspection programs such as: Office of Nuclear Material Safety and Safeguards (NMSS), Office of New Reactors (NRO), Office of Nuclear Reactor Regulation (NRR), and Office of Nuclear Security and Incident Response (NSIR).

0040-02 OBJECTIVES

02.01 To help managers and staff plan and develop clear, accurate, and effective Manual documents.

02.02 To ensure consistency, and meet Agency standards, in the format and content of Manual documents.

0040-03 DEFINITIONS

03.01 General.

- a. Program Document. A Manual chapter, inspection procedure, temporary instruction, or Operating Experience Smart Sample, technical guidance, or Title 10 Code of Federal Regulations (CFR) guidance.
- b. Document Issuing Form (DIF). A form required to initiate creation, revision, or deletion of a program document. A signed DIF is required for every program document creation, revision, or deletion.
- c. Originating Organization. The NRC program office, division, and/or branch responsible for the creation and modification of a program document.
- d. Reactor Oversight Process (ROP). NRC's regulatory framework for operating reactors that includes licensee performance indicator (PI) data, NRC inspection activity and determination of inspection finding significance, and licensee performance assessment.

- e. Construction Reactor Oversight Process (cROP). NRC's regulatory framework for reactors under construction that includes NRC construction inspection assessment and enforcement programs.

03.02 Types of Inspection Manual Documents. A table of contents, inspection manual chapter, inspection procedure, temporary instruction, operating experience smart sample, change notice, technical guidance, or 10 CFR guidance. (See Exhibit 6 for formatting instructions and standards.)

- a. Table of Contents (TOC). An outline of the manual's structure and a numerical listing of the manual documents. Certain document numbers and titles are reserved for future development.
- b. Inspection Manual Chapter (IMC). A document containing written administrative or inspection program statements of policy. IMCs state the purpose, objectives, definitions, responsibilities, authorities, and basic requirements for inspection programs. An IMC for an inspection program defines the program through a listing of inspection procedures, which is normally appended to the IMC.
- c. Inspection Procedure (IP). A statement of the objectives, requirements, and specific guidance for inspection activities, which are focused on safety, security, or safeguards. IPs describe the activities performed by an inspector or technical staff, including administrative requirements. IPs also identify the applicable program, state the objective of the inspection, list the inspection requirements, give inspection guidance, and estimate the resources needed.
- d. Temporary Instruction (TI). A temporary inspection procedure that is focused on current safety issues or concerns not currently addressed by established IPs or IMCs. TIs are issued to supplement an inspection program and generally are placed in effect for a period of 12 to 24 months. They are used for a one-time initial inspection of a safety issue or a one-time collection of information, but not to provide policy and guidance information to the licensee. If a TI will be in effect for more than 24 months, special justification is required.
- e. Operating Experience Smart Sample (OpESS). A mechanism used to integrate operating experience (OpE) into the ROP inspection process. The OpESS makes relevant OpE more accessible to inspectors in the form of a detailed synopsis of selected issues determined to have potential generic safety implications. OpESS's inform and enhance ROP inspection samples within existing ROP inspection procedure requirements and level of effort. Additional information is provided in IMC 2523, "NRC Application of Operating Experience."
- f. Change Notice (CN). A sequentially numbered and dated transmittal document that lists new, revised, and/or deleted program documents; distributes new and revised program documents; and includes a "Remarks" section that summarizes the reasons for issuing, revising, or deleting a document. Any required special training identified in an IP or TI is also stated.

- g. Technical Guidance (TG). A program document issued to provide specific guidance to address a particular technical question that is associated with an inspection procedure. These guidance documents are found in Part 9900 of the Manual. No new technical guidance documents will be issued or revised.

It is planned that every technical guidance document will be reviewed. Based on the type of document and current use, it will be relocated from the inspection manual to another document collection; redefined as another program document, such as an IMC or IP; or deleted entirely.

- h. 10 CFR Guidance. A guidance document on acceptable approaches to particular issues involving rules and regulations in 10 CFR. These guidance documents are found in Part 9900 of the Manual. No new 10 CFR guidance documents will be issued or revised.

It is planned that every 10 CFR Guidance document will be reviewed. Based on the type of document and current use, it will be relocated from the inspection manual to another document collection; redefined as another program document, such as an IMC or IP; or deleted entirely.

03.03 Support Information for Inspection Manual Documents.

See Section 05.02 and Exhibit 6 for formatting instructions and standards.

- a. Table of Contents. The introductory outline of the entire Inspection Manual's structure and listing of the Manual's active program documents.
- b. Appendix. A supplement that contains instructional material, either mandatory or discretionary, that is relevant to a document but is too detailed or extensive to be included directly in the body of the document. An appendix can be included in the back of the manual chapter or procedure itself, or it can be its own stand alone document.
- c. Attachment. Material that is relevant to a document but is too detailed or extensive to be practically included directly in the body of the document. Attachments can be either placed in the back of the inspection manual chapter or inspection procedure, or can be considered as standalone documents. Attachments are generally in the form of a numbered table, exhibit, or figure, etc.
- d. Exhibit. An example or feature of document requirements which may include accompanying instructions.
- e. Figure. Graphical material.
- f. Table. Information presented compactly in columns and rows.

0040-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Program Office.

- a. NRR appoints Inspection Manual (IM) Coordinator.
- b. NMSS appoints NMSS Inspection Manual (IM) Coordinator.
- d. NSIR appoints NSIR Inspection Manual (IM) Coordinator.
- e. NRO appoints NRO Inspection Manual (IM) Coordinator.

04.02 Originating Organization. Following are responsibilities of the originating organization.

- a. Develops and revises program documents necessary to carry out assigned organizational programmatic responsibilities that comply with NRC policies.
- b. Performs tasks consistent with internal office guidance, such as preparing memoranda to obtain comments on proposed new and revised program documents from other organizations and stakeholders, and ensures that all program documents conform to the appropriate guidance and basis documents for each program office.

In addition:

- 1. NRR will ensure that NRR Office Instruction OVRST-102, "NRR Procedures for Processing Inspection Manual Documents" is implemented.
- 2. NMSS will ensure that the Policy and Procedure (P&P) Letter 1-76, "Office of Nuclear Material Safety and Safeguards' Procedures for Processing Inspection Manual Chapters and Inspection Procedures," is implemented. (Due to the merger that occurred in October 2014 between the Office of Federal and State Materials and Environmental Management (FSME) and NMSS, NMSS may choose to use Policy and Procedure 6-8, "Office of Federal and State Materials and Environmental Management Programs Procedures for Processing Inspection Manual Chapters and Inspection Procedures," until a revision of program documents has been completed.)
- 3. NSIR will ensure that NSIR-ADM-100, "Preparing and Maintaining Office Procedures" is implemented.
- c. Elicits appropriate stakeholder feedback from the regions and the NRC offices affected by drafts of new or substantially revised inspection program documents. The comments received are then dispositioned in a comment resolution summary page, which is included in the Document Issuing Package as non-public. (See Sections 06.04 and 06.05).

- d. Identifies training needs associated with performing new or revised procedures required in an IP or a TI, as described in subsection 06.01 of this IMC.
- e. Obtains the necessary approval for any increase in the Full Time Equivalent (FTE) inspection effort specified in a program document. (Which would also include coordination in the initial stages of a TI. See Section 07.03.)
- f. Informs NRC technical staff of a pending procedure change and ensures that required training is provided before the procedure is issued or before the procedure becomes effective.
- g. Prepares and routes final drafts of newly created or modified program documents to the originating organization's Inspection Manual (IM) Coordinator when ready for issuance, in accordance with applicable internal office guidance.
- h. Ensures that a TI is managed by: providing guidance for follow-up and closure of the TI, including specific regional responsibilities; clearly distinguishing mandatory requirements; reviewing and analyzing TI results; giving feedback to the appropriate managers, as necessary; determining whether additional inspection is needed as follow-up to the TI; and submitting the document issuing form (Exhibit 2) to the IM Coordinator of the originating office when initiating, revising, or deleting the TI.
- i. Conducts a periodic review of each of its program documents to determine whether a document should be revised or deleted. The originating office is responsible for maintaining and updating inspection documents. (NRR Office Instruction OVRST-102 defines the review period as "every four (4) years".)
- j. Informs the NRC staff in the affected division about evaluation, revision, or deletion of a program document.
- k. In cases where the program document impacts another office of the NRC, through shared use of resources or scheduling; communicates the parameters and scope of the proposed program document early in the process; includes the other office in the comment seeking and resolution process; and adds an additional signature line on the document issuing form for the other office's management (branch chief or higher).

04.03 Director, Division of Inspection and Regional Support, NRR/DIRS. Coordinates inspection policies, programs, and guidance for nuclear reactors.

04.04 ROP Inspection Programs Division or Deputy Division Director: NRO/DCIP, NRR/DIRS, NSIR/DPR, and NSIR/DSO.

- a. Reviews regional best practices and initiatives for possible incorporation into the construction reactor inspection program/reactor inspection program.

- b. Ensures that all new, as well as major revisions to, cROP program documents and ROP program documents conform to applicable program basis documentation. (A major revision is defined as an extensive change to the document that conforms to overall programmatic changes.)
- c. Reviews and approves the content of new, as well as the major revisions of, cROP/ROP documents (which could include, but is not limited to, policy changes) necessary to carry out assigned program functions. (Division Directors or Deputy Division Directors from NRO and NSIR must sign each DIF before sending the document to NRR for distribution, unless otherwise noted.)
- d. Confirms that a new cROP/ROP document, as well as a major revision, meets the requirements of this IMC prior to signing the DIF (Exhibit 2).
- e. The NRR/DIRS Division Director or Deputy Division Director reviews and approves the content of new NSIR documents, as well as those with major revisions, as they relate to the ROP.

04.05 Chief, Inspection and Regulatory Improvements Branch, NSIR/DPR/IRIB/ Chief, Nuclear Security Oversight Branch, NSIR/DSO/NSOB.

- a. Reviews and approves program documents that relate to the security cornerstone and emergency preparedness areas, respectively, of the cROP/ROP.
- b. Approves and signs requests for comments on program documents that relate to the security cornerstone and emergency preparedness areas, respectively, of the cROP/ROP in accordance with applicable office guidance.

04.06 Chief, Construction Inspection Program Branch, NRO/DCIP/CIPB.

- a. Reviews and approves program documents that relate to the cROP, unless otherwise stated. Provides final approval to issue minor (editorial) document revisions and deletions.
- b. Approves and signs requests for comments on program documents that relate to the cROP in accordance with applicable office guidance.

04.07 Chief, Reactor Inspection Branch, NRR/DIRS/IRIB/ Chief, Performance Assessment Branch, NRR/DIRS/IPAB.

- a. Reviews and approves content for all inspection manual documents that relate to the ROP unless otherwise stated in NRR Office Instruction OVRST-102. Provides final approval to issue minor (editorial) document revisions and deletions. In addition to the designated NSIR branch chief review and approval identified in section 04.05 above,

the IRIB BC reviews and approves content for inspection manual documents that relate to the security cornerstone and emergency preparedness cornerstone of the ROP. The IRIB/IPAB Branch Chief should notify DIRS management of IMC and IP revisions on a periodic basis.

- b. Approves and signs requests for comments on program documents for the ROP unless otherwise stated in NRR Office Instruction OVRST-102.

04.08 Non-ROP Inspection Programs Division or Deputy Division Directors: NMSS.

- a. Approves the content of documents necessary to carry out assigned program functions, and signs the DIF prior to sending the document to NRR for distribution.
- b. Confirms that documents meet the requirements of this IMC prior to signing the document issuing form (Exhibit 2).
- c. Approves and signs requests for comments on program documents in accordance with applicable office guidance.

04.09 Inspection Manual Coordinators: NMSS, NRO, and NSIR.

- a. Ensure that the appropriate inspection program organizations, NRC regional offices, and other affected NRC offices are given the opportunity to comment on documents affecting their programs.
- b. Verify that the requirements of this IMC are met in the preparation and approval of program documents.
- c. Ensure that the policies and procedures outlined in their office's internal guidance (e.g., P&P Letter 1-76 for NMSS, and NSIR-ADM-100 for NSIR) have been followed.
- d. Track the progress of draft program documents submitted to them for issuance and make the status of submitted documents available to those who submitted them, from the date of submission to the date of issuance.
- e. Accept final drafts of newly-created or modified documents prepared by the originating office for submission to the NRR Inspection Manual Coordinator for final processing and issuance.

04.10 Inspection Manual Coordinator: NRR.

- a. Performs the same tasks as the other IM Coordinators as described above for NRR, including ensuring that the policies and procedures of NRR Office Instruction OVRST-102 have been followed, and also:

- b. Accepts final drafts of newly-created or modified program documents from IM Coordinators of other offices for issuance in the Manual. No documents should be accepted from any individual other than an IM Coordinator identified in advance by the originating office's management.
- c. Returns final drafts of program documents to the IM Coordinators of originating offices other than NRR when further changes are required.
- d. Ensures that all format and other requirements have been met for final drafts of program documents. For program documents originating from offices other than NRR, the approvals of the office and division management will be accepted with respect to content.
- e. Assures availability of inspection program documents through the NRC's Agencywide Documents Access and Management System (ADAMS) and the NRC Web site.
- f. Updates the Inspection Procedure Authority System within NRR's Reactor Program System (RPS/IPAS).
- g. Tracks the progress of draft program documents and makes the status of submitted documents available to the IM Coordinators who submitted them, from the date of submission to the date of issuance.
- h. After the documents become official records in ADAMS, sends an e-mail to announce the change notice is issued to the Agency staff listed on the Outlook Distribution list, as well as staff members listed on the DIFs of documents included in the Change Notice.

0040-05 GENERAL INSTRUCTIONS FOR ALL DOCUMENT TYPES

All ROP program documents must conform to IMC 0308, "Reactor Oversight Process Basis Document." If changes or revisions alter the scope or basis of a program document, appropriate updates to the ROP Basis Document are required. Once the need for a basis change is recognized, the appropriate changes to IMC 0308 should be written and provided to the IMC 0308 owner for incorporation into the next issuance of IMC 0308, which will occur approximately every year.

Consider the impact that changes in a particular Manual document (e.g., IMC, IP, TI, or OpESS) will have on other Manual documents. Contact the originating office of the affected Manual document(s) and coordinate further changes that are essential to maintaining consistency within the Manual.

05.01 Plain Writing Guidance. State clearly what the NRC technical staff is to do. Use specific and objective words. State who, what, when, where, and why. State conditions, limitations, and exceptions separately. Write in a readable style in simple English. It is not just desirable for an NRC technical staff to understand your writing; it is mandatory.

- a. Use short words, short sentences, and short paragraphs. If possible, avoid words that are not in common use outside of the NRC unless they are defined or explained. (Most of the program documents are publicly available). Divide long drawn-out sentences into two or more sentences. Try to limit paragraphs to 10 lines or less. Reorganize material to break lengthy, complex paragraphs into several paragraphs or a list.
- b. Read and edit draft material from the user's perspective. Replace wordy prepositions ("in the vicinity of") with one-word prepositions ("near").
- c. For further guidance, refer to NUREG-1379, "NRC Editorial Style Guide," and the Government Printing Office Style Manual (latest edition). These references can be found under the Plain Language Action Plan on the internal website. Also refer to Webster's dictionary (latest edition).
- d. Terminology must be consistent. Do not use two or more words for the same idea, concept, or activity. Except for abbreviations in common use, show the complete word, title, or phrase the first time it is used with the abbreviation in parenthesis immediately after. An example is service water system operational performance inspection (SWSOPI).
- e. The originator must make clear what is mandatory of NRC technical staff and what is discretionary. For example, use "must," "shall," and "will" to indicate mandatory requirements and "can," "may," "might," and "should" to convey discretion.
- f. Since Web links can change, the insertion of a Web link in a document is not preferred and should normally only be used to provide supplemental, non-critical information.
- g. For all new documents and those that contain extensive revisions, the originator should follow the Agency procedures to receive technical editing assistance.

05.02 Program Document Requirements. All drafts and final documents shall be prepared in Microsoft Office Word (MS Word), consistent with the format described in this IMC, and stored in ADAMS. Exhibit 6 provides guidance in using MS Word to prepare Manual documents.

- a. Format requirements listed in Exhibit 6 for tab settings, margins, horizontal graphics line, footers, and page numbering, must be followed.
- b. On the first line, centered, capitalized, and in Arial 19-point bold font, the words NRC Inspection Manual shall be entered; and against the right margin, the organizational code in Arial 10-point font, entered.
- c. The main body and the footer must be in Arial 11-point font, left justified. Do not use bold, italic, shadow, or other appearances. Underline may be used for emphasis. The only exceptions are charts and graphs that may appear in the main body, and commitments, which are required to be in italics (see subsection 06.03 of this IMC).

- d. All footers shall be the same throughout the entire document with the following format: the issue date at the left margin and the document number at the right margin. Page numbers should be located at the bottom center of each page, and numbering should restart with each new component: the table of contents (if any) in lower-case Roman numerals; the body of the document with Arabic numbers, and exhibits, tables and attachments with a designating prefix (letter or letter/number combination), hyphen, and number (e.g., the third page of Exhibit 4 as E4-3).
- e. The last page(s) of a program document shall list the revision history (see subsection 06.06 of this IMC) to include: the ADAMS accession number of the document, a brief description of the scope of the revision, training required as a result of the change, the date the training was completed, ADAMS accession number for comment and feedback resolution summary, and commitment tracking identification numbers specific to the document (see Exhibit 3).
- f. The Manual document must be placed in ADAMS. The originator should ensure version control when revising and creating Manual documents by using the ADAMS check-out and check-in procedures and other version control techniques for exclusive use of official copies from ADAMS.
- g. All new or substantially revised Manual documents should be reviewed by an Agency technical editor.

05.03 Revisions to Documents. When Manual documents are revised, the entire document is re-issued. To make revisions, edit the MS Word version of the current document. First remove the existing vertical lines in the margins showing revised text and the red font of changed text by clicking on the Review tab and then accepting all changes in document. Save the document. Then set up the Track Changes options in MS Word to display insertions in red and Changed Lines in the Outside Border to always show balloons (see Exhibit 6). In the case of a total rewrite of a document, it is not necessary to mark the changes in red with lines in the margins. Revisions are issued by a change notice, giving careful consideration to not deleting generic inspection requirements inadvertently. Major changes to the document must be noted in the revision history page (see subsection 06.06 of this IMC).

05.04 References. References must be directly relevant to the document and essential to its completion. The reference list shall include all other inspection manual documents (IMC, IPs, and TIs) that appear in the document. References may not be used simply to convey historical information. References to another inspection program document must include the type of document, the number, and the section or appendix (e.g., IMC 2500-05.01; IMC 2500, Appendix A). Reference to another section of the same document should include a phrase such as 'subsection 04.01 of this IMC.'

Any commitment being added to a document (such as requirements of a generic letter) shall also be listed in the section where it appears and identified with a commitment tracking number as described in subsection 06.03 of this IMC. Commitments must also be included under the commitment section of the revision history page.

05.05 Incorporating Other Documents. Documents from the NRC or other agencies may be incorporated by reference into Manual documents when necessary to conduct the inspection program.

05.06 Requests for Guidance, Revisions, and New Documents.

- a. Requests for guidance, new documents, and revisions to documents applicable to the ROP should be initiated using the Feedback Process, as described in IMC 0801, "Reactor Oversight Process Feedback Program." This process will track the requests through the evaluation and editing periods.
- b. Requests for guidance, new documents, and revisions to documents other than those applicable to the ROP should be addressed to the Chief, IRIB, NRR, for reactor inspection programs or to the applicable manager in NMSS, NRO, or NSIR.

0040-06 DOCUMENT PREPARATION AND PROCESSING

06.01 Training Considerations. When planning to revise an existing document or create a new document, assess the need for NRC technical staff to be trained. This determination should consider whether written guidance already exists, the complexity of the activity, and the frequency in which the staff performs the activity. In general, training should be developed for activities that require a new skill, are complex in nature, or require a subject matter expert to answer questions. When training is required, the originating organization is responsible for developing the technical content and determining the most appropriate training method. Training methods include updating written guidance, conducting a teleconference or video conference, recording the training on video tape, developing computer or Web-based training, adding self-study or on-the-job training standards to existing qualification requirements, or conducting regional presentations. When selecting the training method, consider the time needed for all affected staff to complete the training and that training should be completed prior to issuing the Manual document.

06.02 Document Preparation. Develop a new document in the current version of MS Word, using the structure and format requirements, described in this IMC.

Use the current official Manual document as the starting point for a revised Manual document. Retrieve the current MS Word version of the document from the NRC Web site and save it as a separate working file. To retrieve the most recent MS Word version: go to the NRC internal home page and follow these steps, click on: (1) Organization, (2) click on NRR, (3) click on ROP Digital City, (4) under the section "Inspection Documents" or "Security Documents," click on type of Manual document, and (5) locate the number of the document. The MS Word file associated with the document is the file labeled "doc" or "docx" on the public Web, and linked to the MS Word icon on the internal website for security-related documents.

06.03 Incorporating Generic Requirements.

- a. There are instances when specific inspection requirements are placed in an inspection procedure to satisfy a generic requirement (e.g., identified in a generic communication, such as a bulletin). When adding the commitments of a generic requirement to a Manual document, the requirement shall be identified as follows:
 1. The text that defines the commitment shall be italicized. This is a specific exception to the requirement not to use italic text type in a program document for emphasis. Spacing before and after the text should be such that the information clearly stands out within the document.
 2. A commitment tracking number shall be assigned using the next sequential number available for that procedure. This number shall be bracketed and entered following the italicized text (e.g., [CX]); and the commitment tracking number added to the revision history page.
- b. To delete a generic requirement that is no longer valid, the approval of the respective division director is required.

For IMC 0040, the following commitment applies:

To ensure that generic inspection requirements are not inadvertently deleted through a revision to a procedure, a review of the revision history section shall be performed. If the revision history does not cover a minimum of 4 years, then a review of the change notices from the past 4 years for that document shall be performed and the results documented in the revision history page. Change Notices are located on the external NRC Web Page. [C1]

06.04 Regional and Office Comments. Drafts of new or substantially revised inspection program documents must be sent for review and comment to offices that will be affected by the changes. Documents that will have an effect on more than one office, i.e., NMSS, NRO, and NSIR, need to be routed through the appropriate IM Coordinators to ensure affected divisions and regions have had the opportunity to comment on the document. IM Coordinators in NMSS, NRO, and NSIR should follow the appropriate internal office guidance (e.g., Office Instruction OVRST-102 for NRR, P&P Letter

1-76 for NMSS, and NSIR-ADM-100 for NSIR). Each office's IM Coordinator shall ensure comments from regional offices and other internal stakeholders of the document have been obtained according to the applicable office guidance. It is the responsibility of the originating office to obtain comments, perform comment resolution, and create a comment resolution summary page for each document.

- a. The purpose of the review and comment period is to resolve issues specific to the proposed change to the document. Comments outside the scope of the proposed change are not appropriate for this process and should be submitted using the processes described in subsection 05.06 of this IMC. However, depending on the

nature of the comments received, it *may* be appropriate to include comments outside the scope of the proposed change. These non-editorial changes should be shared with the regions and the NRC offices affected - if they meet the review criteria - and may warrant an additional opportunity for comment. (The review and comment period is, on average, 30 days. If additional time is needed for the review, a request for an extension should be provided to the technical lead and Inspection Manual Coordinator via e-mail.)

- b. Comments from the regions are important because the regions implement the inspection programs. However, requests for their comments must be controlled so they do not become burdensome on their workload. Minor, non-substantive changes do not need to be sent to the regions for comment. In those cases, the comment resolution column of the revision history page is marked N/A (see subsection 06.06 of this IMC). Determine if a document must be sent to the region by answering the following questions:

1. Will the proposed document affect regional resources?
2. Will the document significantly affect regional programs?
3. Is a regional perspective really needed?
4. Are the regions interested in the subject?
5. Does the document represent a major policy change?
6. Could any of the proposed changes to an existing procedure potentially change its context and/or impact the inspection program?

If the answer to any of the questions is "yes," then a draft of the document should be sent to all regions and other affected offices for comments.

- c. The rules for sending draft documents to the regions for comments are:

1. Send only final drafts.
2. Identify a technical person in the originating office who the regions can contact to discuss the document.
3. Prepare the request far enough in advance of the document's deadline to allow for review of not less than 30 calendar days, unless otherwise specified.
4. Each program office shall identify persons in each region and other stakeholders in organizations within the NRC to review the draft documents out for comment.
5. For requests for regional comments on new or revised Manual documents that involve major policy changes, send a copy to the Office of the Deputy Executive Director for Regulatory Programs and the Office of the Inspector General.

06.05 Comment Resolution. The originating office will include a copy of all substantive written comments received with their disposition briefly noted in the document issuing package. The originator will enter the final version of the comment resolution summary into ADAMS and list the accession number on the revision history page. (See Exhibit 3 for an example of a comment resolution summary.) Prior to submitting the document issuing package to the NRR Inspection Manual Coordinator, the comment resolution summary, and applicable feedback forms, shall be declared as an official non-public record in ADAMS.

06.06 Update or Create Revision History Page. Maintaining a revision history page will ensure that requirements are not inadvertently deleted. If a revision history page does not already exist for the document, it shall be created by the originator using Exhibit 4 as an example. The first time the document is issued, the "Description of Change" column shall include a statement that a four-year historical search¹ for commitments was conducted and whether or not commitments were found. The training completion date (if training is required) in all cases shall be prior to the document issue date. When applicable, ROP feedback form numbers shall be listed in the "Comment and Feedback Resolution Accession Number" column. ADAMS Accession numbers of the document, feedback form, and comment resolution summaries shall be listed. To provide an historical record of the document, consider listing the ADAMS Accession numbers for previous revisions. The issue date will be filled in by the NRR Inspection Manual Coordinator prior to issuing the final document.

Note: The revision history page identifies certain commitments. In addition to being used as a mechanism for knowledge transfer and to generate the change notice, it also is a way to quickly identify why the document was created or modified and the last time it was reviewed. Documents not containing a revision history page will be returned to the originator for correction.

06.07 Document Issuing Package. It is the responsibility of the IM Coordinator of the originating office to ensure that all documents are correctly formatted and that the comment and feedback resolution summary is an official Agency record in ADAMS prior to routing to the NRR Inspection Manual Coordinator. Exhibits 5 and 6 shall be used to meet this requirement. Documents failing to adhere to the guidelines provided in these exhibits will be returned to the IM Coordinator of the originating office, and then to the originator for correction.

Before routing the document to its IM Coordinator, the originating organization shall enter the final document, as well as the comment and feedback resolution summary into ADAMS, and prepare a hard-copy document issuing package. The comment and feedback resolution summary shall be profiled as non-publicly available. Owner rights to the final document shall be granted to the originating office IM Coordinator and the NRR Inspection Manual Coordinator. A complete document issuing package consists of the following:

¹ A four year historical search consists of, but is not limited to, a review of SECY papers, Staff Requirements Memoranda (SRM) and other relevant program documents that have a direct impact on the inspection document.

- a. A completed and signed paper copy of the document issuing form (DIF) (Exhibit 2). If more than one office provides input to creating or revising a document, additional signature lines may be added to the DIF. If the resources of another office are anticipated to be used in the inspection activity, an additional line for the signature of a branch chief or division director or deputy division director of that office must be added. Electronic template files of the document issuing forms (Exhibit 2) are posted on the NRR ROP Digital City website (from the NRC internal home page, go to NRR, then ROP Digital City, and then select the office document issuing form from the bottom-left pull-down menu, "Forms, Templates, Sample Reports and More"). The signed DIFs are included in the final Change Notice ADAMS package as non-public.
- b. A paper copy of the final version of the document to be issued, including color copies of any graphics or exhibits that are intended to be shown in color. All documents must have an updated revision history page, and will include the Accession number of the Comment Resolution Summary document where applicable. In addition, if the document revision caused a feedback form to be closed, the feedback form number and the Accession number will be included on the Revision History page. The paper document should be identical to the electronic version of the document in ADAMS. (If the issuing document is a TI, it should be, on average, 10 to 25 pages long, and should not include policy or guidance information.)
- c. A paper copy of the comment and feedback resolution summary, as well as any open feedback forms that will be closed by issuing a new or revised document (see Exhibit 3).
- d. Completed ADAMS Document Submission Forms (Form 665P) for the final document to be issued and the comment and feedback resolution summary. For public documents, it is required that a Sensitive Unclassified Non-Safeguards Information (SUNSI) review be completed, and the words, 'SUNSI Review Complete' entered in the keyword field of the ADAMS profile before a Manual document is issued. Non-public documents must be entered into the ADAMS profile, and documented on the Form 665, with applicable entries for the keyword and document sensitivity fields.

06.08 Deleting Documents. For documents in which the inspection activity is complete or no longer applicable, the originating organization shall submit the Document Issuing Form (Exhibit 2), with the box "Deletion" checked and write the reason for deletion. The document will be removed from the active documents of the Inspection Manual that are listed in the Table of Contents and posted on the Web. The DIFs for each deleted document will be saved in ADAMS.

06.09 Manual Coordinator's Review. The originating organization of any NMSS, NRO, or NSIR document shall route all document packages to the respective office's IM Coordinator for review. Upon satisfactory review, the originating office's IM Coordinator then shall submit the document to the NRR Inspection Manual Coordinator. NRR documents are routed directly to the NRR Inspection Manual Coordinator. Documents submitted to the NRR Inspection Manual Coordinator that are not ready for issuance will be returned to the IM Coordinator of the originating office for correction, as required. The NRR Inspection Manual Coordinator reviews the document for publication.

06.10 Final Approval. Final approval of program documents for inclusion in the Manual is given by the division director or deputy division director of the originating office, other than NRR. The NRR/DIRS/IRIB (or IPAB) branch chief will approve minor revisions (i.e. editorial) to existing documents. The NRR DIRS division director or deputy division director will approve major revisions and policy changes to an existing document, as well as the issuance of a new document (for NRR see Sections 04.04 and 04.07). The NRR Inspection Manual Coordinator will publish the change notice on the NRC Web site.

06.11 Standard Distribution of Manual Documents. New and revised Manual documents are distributed by publication of a change notice. Technical leads within NRR will ensure that the document is distributed to any necessary staff in addition to the standard change notice distribution list. IM Coordinators and regional counterparts outside of NRR shall ensure that the document gets the widest dissemination necessary in accordance with internal office policy.

0040-07 DOCUMENT TYPES AND FORMATS

The Inspection Manual is divided into 100 parts numbered 0000 through 9900 (0000 is the first part, 0100 is the second part, etc.). Manual documents within the parts have 4-digit numbers (manual chapters), 5-digit numbers (inspection procedures), or 7-digit numbers (temporary instructions).

07.01 Inspection Manual Chapters. Manual chapters numbered 0000 through 1999 are used for policy statements on the inspection programs and the manual. Inspection Manual Chapters 2000 through 2999 define the various inspection programs. The first two digits of the manual chapter number identify the administrative or inspection category, and the last two digits identify the inspection program. For example, the first two digits of IMC 2515 identify the inspection program (reactor), the third digit identifies the type of reactor (light water), and the fourth digit identifies the operational phase (operations) – “Light Water Reactor Inspection Program – Operations Phase.” Inspection manual chapters include the following:

- a. Table of Contents. Due to the amount of information provided in an IMC, a table of contents shall be included to allow the user to make more efficient use of the document. Pages of the Table of Contents shall be numbered with lower-case Roman numerals.
- b. Section 01, “Purpose.” Provides a broad statement of the topic covered by the IMC.
- c. Section 02, “Objectives.” Used to state the aim of the program or functions covered by the IMC. This section is not required if this information is already covered in Section 01.
- d. Section 03, “Applicability.” Identifies the type of facilities, operations, actions, or population for which the IMC is applicable. The applicability section is optional.

- e. Section 04, "Definitions." A definition is only necessary if the term is used in a special sense or the meaning may not be clear to the user.
- f. Section 05, "Responsibilities and Authorities." Provides a brief description of ownerships arranged from higher to lower levels of authorities.
- g. Section 06, "Requirements." This section is used to provide the specific instructions of the IMC.
- h. Section 07, "References." The reference section shall list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document, plus other relevant documents as described in subsection 05.04. Additional sections can be used beyond 07, as required, to provide better structure to the document.

07.02 Inspection Procedures. IPs are subdivisions of Parts 3000 – 9800 of the manual, are five-digit numbers, and describe the activities to be performed by an inspector to implement a part of an inspection program. For example, the first two digits of IP 71111.01, "Adverse Weather Protection," identify the part of the manual (7100 Operations (License & TS Requirements)), and the 111.01 is the number of the procedure in the sequence of procedures in Part 7100. (Pilot inspections will be considered for a new or substantially revised NRC requirement(s). The purpose of the pilot inspection is to determine the adequate inspection scope and requirements which NRC should verify to ensure that the licensee is in compliance with either a new or substantially revised NRC requirement(s). Pilot inspection procedures can be in effect for several years and are cancelled once the results, as appropriate, are incorporated into the ROP baseline inspection program.)

IPs include the following sections:

- a. "Program Applicability." Identifies the IMC(s) to which the IP applies, and should be reviewed and updated, as necessary, with each inspection procedure revision.
- b. Section 01, "Inspection Objective(s)." States the objective(s) of the IP.
- c. Section 02, "Inspection Requirement(s) and Inspection Guidance." Describes the requirements for completing the procedure and achieving its objectives and corresponding inspection guidance. This section may specify systems, components, and records to be inspected and inspection methods such as sampling (including sample sizes), observation, records review, and interviews. The IP should not involve excessive reviews of documents. Some auditing of documents (e.g., reports, analyses) may be necessary, but the emphasis should be on inspecting equipment and observing licensee activities. Ensure it is clear to the inspector what portions are mandatory and what, if any, are optional.

This section may contain general guidance. After each requirement, specific inspection guidance should follow. Specific guidance explains how individual requirements can be accomplished and alerts the inspector to potential problems. Clearly identify guidance,

so it will not be mistaken for additional inspection requirements. For new procedures, the guidance section can be used to tell the inspector how the originating office intended the requirements to be accomplished. For existing procedures, the guidance should reflect experience gained or problems encountered in performing the inspection.

Note: For existing IPs, there is an option to separate the inspection requirements and inspection guidance into two sections based on specific organizational needs. For this option, the inspection guidance section may offer general as well as specific guidance; and each inspection requirement should have a specific number or letter assigned to it for identification purposes. The identifier should be used in the inspection guidance section to associate the specific guidance to the associated requirement. When there are two separate sections, if no guidance is given for a requirement, the corresponding identifier in the guidance section should use the phrase, "No inspection guidance." (This was primarily done with pre-ROP procedures, but can be done with ROP procedures as well. By using this method, the numbering scheme in the procedure will change, but it will not necessarily change in the report itself.)

- d. Section 03, "Resource Estimate." An estimate of the average time needed to complete the inspection (not including preparation and documentation time). This estimate is for broad resource planning and is not intended as a measure for judging the inspector's or the region's performance. Actual inspections may require substantially more or less time, depending on the individual circumstances.
- e. Section 04, "References." Lists documents that will be immediately helpful to the inspector in performing the inspection procedure. The reference section is not intended to be a historical listing of documents about the inspection area. It should be limited to those references directly relevant to performing the procedure. Manual documents should not reference documents, policies, or practices of the Institute of Nuclear Power Operations (INPO).

The reference section shall list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document. For NRC documents, the ADAMS accession number (e.g., ML003717333) should be listed last. Regulatory guides and industry standards and codes do not need an ADAMS accession number.

Procedures for the risk-informed baseline inspection program for reactors may include requirements and guidance in attachments to the procedures. For this program, the attachments correspond to "inspectable areas" within the "cornerstones of safety" that form the foundation of the ROP (see IMC 2515, "Light-Water Reactor Inspection Program -- Operations Phase").

- f. Section 05, "Procedure Completion." Defines the minimum sample size to be inspected and reported in RPS in order to consider the procedure complete. Describes what is meant by inspection sample(s) and how samples are counted.

07.03 Temporary Instructions (TIs). Temporary instructions are issued with a number that includes the number of the manual chapter with which the TI is associated,

followed by a sequence number. For example, TI 2515/102 would be the 102nd TI issued under the operating phase of the light water reactor inspection program (IMC 2515). A TI is primarily used as a one-time inspection of a significant generic safety issue or less frequently for a one-time information collection. (It is not used to provide or document policy and/or guidance information to the licensee.)

Requests for new ROP TIs should be directed to the Reactor Inspection Branch Chief (NRR/DIRS/IRIB) to obtain approval for budget estimates. This request would typically be made via e-mail, after completing the ROP TI Request Form (found on ROP Digital City/Communications and Training/Temporary Instruction Request Form) *as soon as the need for a TI is identified*. The request should include the necessary background to understand why a TI is required, or warranted, including why the information should not be obtained by other means (e.g., OpESS or generic communication), an estimate of required resources and site applicability, an assessment of the safety or security significance providing justification for such resource expenditures, and the estimated dates for start and completion. The IRIB Branch Chief will discuss the proposed TI with his/her Regional counterparts to obtain their views on the implications of the proposed TI. If the IRIB Branch Chief approves the TI request, it will be provided to the DIRS Division or Deputy Division Director for final approval or denial to proceed with the TI.

A TI is, on average, a 10 to 25 page document that is in effect for a 12 to 24 month period. Their purpose is to have inspectors concentrate on a specific, current issue, not an overall program. Any TI that will be more than 25 pages should consider specifically what it is asking the inspectors to do. If a TI will be in effect for less than 12 months, or more than 24 months, the originator must provide a special justification to the NRR/DIRS/IRIB Branch Chief by e-mail. The request to extend the TI should be received in a timely manner prior to its expiration. If it is not, the TI will be deleted via a Change Notice and closed in the Reactor Program System (RPS).

Each TI has an expected completion date, as well as an expiration date. If the stated purpose of the TI has not been accomplished by the expiration date, or if there is a need to add clarification to existing requirements and guidance, the originating organization may revise and reissue the TI. The revised TI must be accompanied by a document issuing form (Exhibit 2) justifying the re-issuance. TIs are the only Manual documents that use revision numbers. Revisions of other Manual documents are indicated only by the new issue date.

TIs shall contain the following information:

- a. Cornerstone (for ROP TIs only). Lists the cornerstone(s) for which the TI is applicable.
- b. Applicability (for ROP TIs only). Identifies the facility or facilities, site(s), and unit(s) for which the TI is applicable.
- c. Section 01, "Objective(s)." Lists the objective(s) of the TI. For multiple objectives, use a bulleted list. This section also states whether the nature of the TI is performance-based or information-gathering.

- d. Section 02, "Background." This section provides critical and pertinent background information required to understanding the generic issue and assist in the implementation of the TI. This section should specifically describe the reasons why this TI is being issued including an assessment of the safety or security significance and justification of resources expenditures.
- d. Section 03, "Inspection Requirements and Inspection Guidance." This section presents, in a numerically-ordered list of distinct, concise statements, the specific inspection items that need to be accomplished in order to meet the objective(s) stated in Section 01. Each numbered requirement shall be followed by specific guidance to implement the requirement. TIs emphasize observing activities. They are not to be used for solely reviewing documents. TI requirements should be performance-based, clearly stated, and focused on the implementation of programs, modifications, and procedures. However, TIs that are information-gathering by nature may involve inspection requirements for Agency inspectors that are slightly different from performance-based requirements.

Revisions of existing TIs may have separate sections for inspection requirements and inspection guidance based on, specific organizational needs.

- f. Section 04, "Reporting Requirements." States where and how the TI results will be documented. In most cases, TI results are documented in inspection reports, (e.g., in accordance with IMC 0612, Power Reactor Inspection Reports)." The TI shall specify the location and information required to be documented. In cases where the inspection results are not to be documented in a routine inspection report, sufficient additional information must be provided regarding the specific reporting requirements. Any non-standard distribution of reports documenting the TI inspections should be specified in this section (e.g., filling out a table that is attached to the TI and e-mailing it to NRR for review).
- g. Section 05, "Completion Schedule." This section includes an expected date for completion of the TI. This date should be reasonable and should precede the expiration date of the TI to allow the originating organization sufficient time to interpret, analyze, and report the TI results. For ROP TIs, completion dates should be the last day of a calendar year quarter (March 31, June 30, September 30, or December 31).
- h. Section 06, "Expiration." States the effective duration of the TI and includes an expiration date, which marks the official end of the TI. In establishing the expiration date for TIs under the ROP, consider the amount of time beyond the completion date the staff will need to complete the inspection report and associated enforcement activities. After the expiration date, no resources shall be charged to the TI, and the originating organization shall follow the procedures described in subsection 06.08 of this IMC to delete the TI from the Inspection Manual.
- i. Section 07, "Contact(s)." This section identifies the originating organization (office, division, and branch) and the name, phone number, and e-mail address of technical contact(s) who are designated to answer questions about the TI. Usually the author of

the TI is considered the lead technical contact. Other technical contacts may include, but are not limited to, other staff within the branch and the immediate supervisor of the technical lead.

- j. Section 08, "Statistical Data Reporting." This section identifies temporary instruction number(s), the associated charge codes (e.g., Inspection Procedure Authority System (IPE) and activity codes) for the TI and, if necessary, the inspection procedure and code to which an inspector should charge time for any follow-up inspections after the TI has been completed. For ROP-related TIs, all inspection effort should be charged to TI 2515/XXX (which represents the number of the TI), the IPE code of TI, and the activity code of TIP for preparation or TID for documentation.
- k. Section 09, "Resource Estimate." This section presents an estimate of the direct inspection effort (DIE) in hours per unit or site needed to complete the TI inspection requirements. The estimated average time should include a band (i.e., a low and a high estimate). If the resources during the implementation of the TI can be attributed to other IPs other than the TI, provide a list of potentially applicable IPs, and an estimate (in hours) of the potential usage.
- l. Section 10, "Training." This section states the required training needed in order to successfully accomplish the inspection requirements. If the necessary training needed is covered by program office's general training and qualification program (e.g., IMC 1245, Qualification Program for the Office of Nuclear Reactor Regulation Programs,) stating the applicable appendix of training IMC will suffice.
- m. Section 11, "References." Lists documents that will be immediately helpful to the inspector in performing the TI. The reference section shall list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document.

When the originating organization determines that the stated purpose of the TI has been accomplished, it shall prepare a final report documenting the TI results for distribution to pertinent staff no later than the expiration date. The final report may also recommend additional inspections or changes to the inspection program. In those cases, the originating organization shall add the appropriate branch chief (for the ROP, Chief, IRIB or IPAB), to the distribution.

When the stated purpose of the TI has been accomplished, the originating organization will delete the TI by submitting a document issuing form (Exhibit 2) to the IM coordinator. All TIs shall be deleted by the expiration date.

07.04 Operating Experience Smart Samples (OpESSs). OpESSs may be employed to inform and enhance ROP inspection of selected OpE issues determined to have potential generic safety implications. OpESSs are only developed when an inspection can be accomplished within existing ROP inspection requirements and level of effort. Issues that cannot be addressed within existing ROP inspection requirements and level of effort should be considered for a one-time inspection under a TI.

OpESSs contain the following information:

- a. **Cornerstone.** List the cornerstone(s) for which the OpESS is applicable. The cornerstone(s) may include one or all of the cornerstones listed for the ROP pertinent inspection procedure(s).
- b. **Applicability.** Identifies the type of plant (e.g., PWR, BWR, CE, Mark 1 containment, etc.) that is affected or could be inspected under the OpESS.
- c. **Objective(s).** Lists the objective(s) of the OpESS. The objective(s) may be more specific than those specified in the selected inspection procedure(s) but must be congruent with the stated objective(s) of the selected inspection procedure(s).
- d. **Background.** Presents OpE associated with the OpESS and relevant research and references.
- e. **Inspection Guidance.** Provides the information and links for inspectors to use during inspection of the OpESS. Include a list of applicable ROP baseline IP(s) and how the OpESS satisfies one (or more) of the sample requirements for the IP(s). The guidance may be more specific than those specified in the selected IP(s), but must be congruent with the stated objective(s) of the selected IP(s).
- f. **References.** List of documents that will be helpful to the inspector in performing the OpESS. These may include related generic communications, management briefing slides, Regulatory Guides, INPO documents, previous related inspection findings, and OpE communications. Include hyperlinks when available.
- g. **Reporting Results/Time Charges/Additional Issues.** In general, OpESS results will be documented and inspection reports will be distributed in accordance with guidance specific to existing inspection procedure(s) and IMC 0612, "Power Reactor Inspection Reports." Any guidance on non-standard documentation or distribution shall be specified in this section. In addition, provide guidance on how inspectors are to charge their time under the baseline ROP inspection program.
- h. **Contact(s).** Identifies the name, phone number, and e-mail address of technical contact(s) who are designated to answer questions about the OpESS. This is generally the OpESS author and applicable NRR contacts. This contact information may be redacted from the OpESS posted on the NRC public webpage.
- i. **Attachments.** May be used as necessary to provide additional information related to the OpESS.

07.05 Appendix. An appendix may contain additional instructional material. Appendixes must pertain to the IMC, IP, or TI to which they are appended. They should not contain policies, responsibilities, or requirements, which are to be covered in the basic document. An appendix format shall follow the chapter format as much as possible, and will be depicted by a letter (A, B, C, etc.) in the title.

- a. Purpose. Briefly explain why an appendix is being provided.
- b. Objectives. Provide necessary information to understand the guidance of the appendix, as well as its context.
- c. Applicability. Provide necessary detailed information for the appendix.

07.06 Attachment. An attachment may contain additional instructional material. Attachments must pertain to the IMC, IP, or TI to which they are appended. They should not reiterate policies, responsibilities, or requirements, which are covered in the basic document. An attachment format shall follow the chapter format as much as possible, and will be depicted by a number (1, 2, 3, etc.) in the title.

- a. Purpose. Briefly explain why an attachment is being provided.
- b. Objectives. Provide necessary information to understand the guidance of the appendix, as well as its context.
- c. Applicability. Provide necessary detailed information for the attachment.

The Revision History Table is an inclusive attachment to an inspection manual chapter, inspection procedure and/or temporary instruction that outlines the revisions made to the document on a summary page.

07.07 Table. Every table should have a number (Table 1, 2, etc.) and should be cited in the text by that number. In general, tables should have titles, and the text within the table should be font Arial 11, but can also be font Arial 9 or 10, depending on the size of the table.

07.08 Figure. Every figure should have a number (Figure 1, 2, etc.) and should be cited in the text by that number. In general, figures should have titles. The NRC Graphic Services Section, Office of Administration, is available to prepare figures.

07.09 Exhibit. Every exhibit should be numbered (Exhibit 1, 2, etc.) and should be cited in the text by that number.

07.10 Issue Date. The issue date is on each page of the document in the form XX/XX/XX and is placed at the lower left of the page (as illustrated in this IMC). The issue date is omitted from the first page of an IMC that contains a Table of Contents. The actual date will be entered by the NRR Inspection Manual Coordinator before the document is issued. The format for the issue date is: "Issue Date: XX/XX/XX" (2 spaces after the colon).

07.11 Document Number. The document number is put at the bottom right of all pages containing an issue date. Revisions of Manual documents have the same number as the original document. The NRR Inspection Manual

Coordinator is responsible for assigning numbers for new Manual documents. Office Inspection Manual Coordinators and NRR document originators should request the NRR Inspection Manual Coordinator to reserve numbers for new Manual documents before the document issuing package is prepared.

0040-08 REFERENCES

IMC 0308, "Reactor Oversight Process (ROP) Basis Document"

IMC 0801, "Reactor Oversight Process Feedback Program"

IMC 1245, "Qualification Program for Operating Reactor Programs"

| IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document"

| IMC 2515, "Light-Water Reactor Inspection Program -- Operations Phase"

| IMC 2600 Appendix A, "Guidance for Conducting Fuel Cycle Inspections"

| IMC 2800, "Materials Inspection Program"

NUREG-1379, "NRC Editorial Style Guide"

U.S. Government Printing Office Style Manual

END

Exhibits:

1. Pictorial view of IMCs, IPs and Supporting Documents
2. Links to Document Issuing Forms
3. Example of Comment Resolution Summary
4. Example of Revision History Page
5. Example of Document First Page
6. Format Requirements Checklist
7. Guidance for Using MS Word

Attachment:

Revision History for IMC 0040

Inspection Manual Chapters: (Policy)

- Written statements of policy that cover most NRC oversight and inspection program areas (e.g., reactors, materials, reactor construction, fuel facilities, etc).
- State the purpose, objectives, definitions, responsibilities, authorities, and basic requirements for inspection programs.
- Defines the program through a listing of inspection procedures, which is normally appended to the IMC

Inspection Procedures: (Implementation of Policy)

- A statement of objectives, requirements and specific guidance for inspection activities, which are focused on safety, security, or safeguards.
- Describe the activities performed by an inspector or technical staff, including administrative requirements.

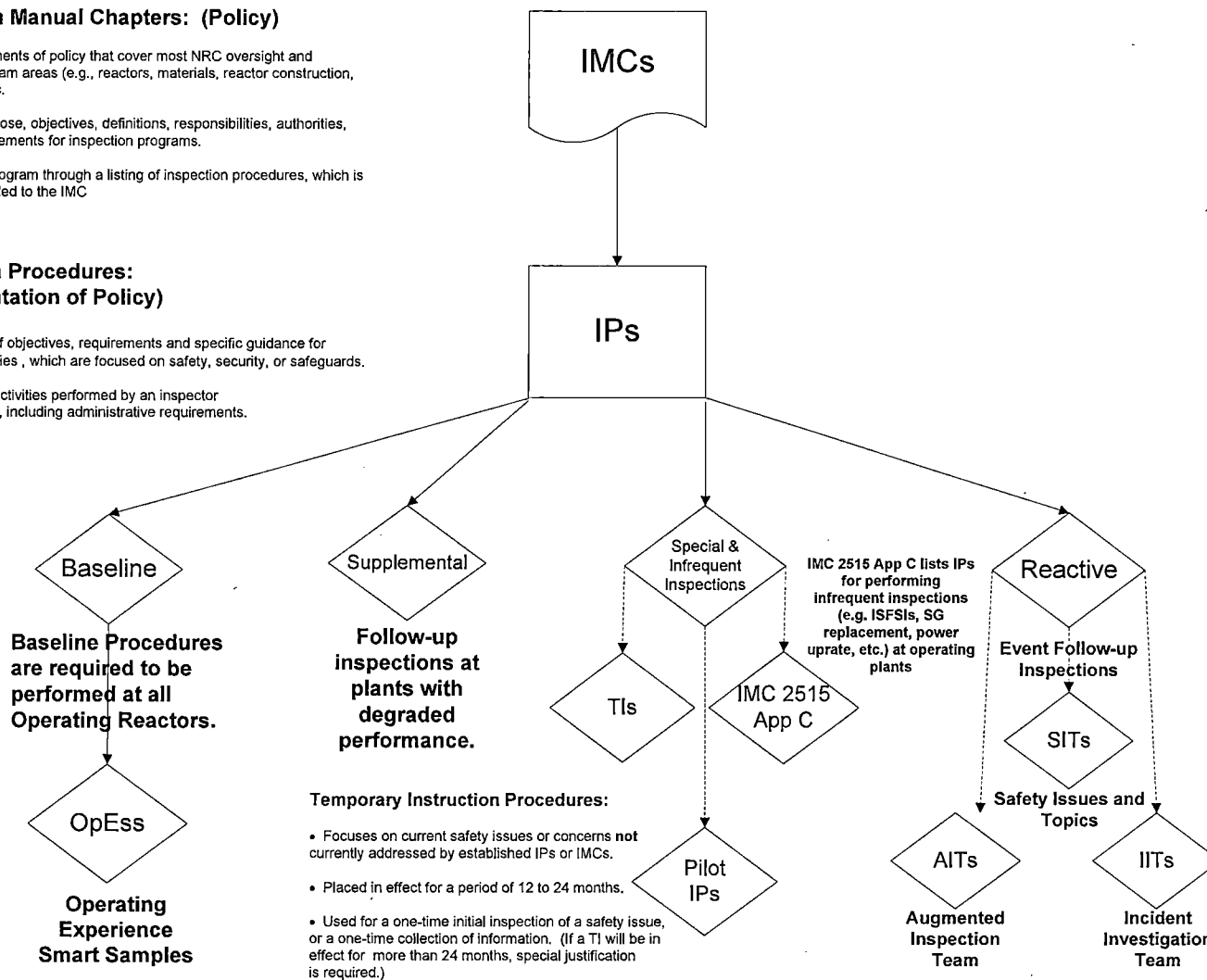


Exhibit 2 - Links to Document Issuing Forms (DIF)

(posted on NRC internal website: NRR/ROP Digital City under "Forms, Templates, Sample Reports & More")

NMSS Document Issuing Form:

<http://nrr10.nrc.gov/rop-digital-city/index.html>

NRO Document Issuing Form:

<http://nrr10.nrc.gov/rop-digital-city/index.html>

NRR Document Issuing Form:

<http://nrr10.nrc.gov/rop-digital-city/index.html>

NSIR Document Issuing Form:

<http://nrr10.nrc.gov/rop-digital-city/index.html>

The screenshot displays the NRR/ROP Digital City website. At the top, there is a header with the text "NRR/ROP SERVICES" and "Last Update: April 14, 2014". Below the header, there are several sections: "SharePoint Sites" with links to "Performance Assessment Branch (PAB) R", "Reactor Inspection Branch (RIR) R", "Security Documents" with links to "Manual Chapters", "Inspection Procedures", and "Temporary Instructions", "OpE Smart Samples (OpESS)" with a link to "OpE Smart Samples", and "Forms, Templates, Sample Reports & More". A dropdown menu is open under "Forms, Templates, Sample Reports & More", showing a list of documents including "RCS Unidentified Leakage Trending-BWR", "RCS Unidentified Leakage Trending-PWR", "IMC 0305 Exhibits and Meeting Slides", "IMC 0329 Exhibits", "IMC 0040 Format Checklist", "IMC 0040 Format Example", "IMC 0040 FSME DIF", "IMC 0040 NMSS DIF", "IMC 0040 NRO DIF", "IMC 0040 NRR DIF", "IMC 0040 NSIR DIF", "IMC 0040 Revision History page", "IMC 0040 Comment Resolution Summary", "IMC 0040 Word Guidance", "ASME Head Fabrication Checklist-Word", "Letter, Closing EP Report # Word", "Form 3-III, Choice Ltr (EM AppB)", "Form 3-III(S), Choice Ltr Sec (EM AppB)", "Form 3-III, Final Det. Ltr (EM AppB)", and "Form 3-III(S), Final Det. Ltr Sec (EM AppB)". On the right side, there is a box titled "OTHER RELATED MATERIALS" with links to "ROP Safety Culture", "OP Safety Culture", "Inspection Report Audit Instructions", "Reactor OpE Information Gateway", "SDP Notebooks (Archived)", "Team Leader Administrative Checklist", "Time and Labor Reporting", and "Regional Web Sites". At the bottom, there is a footer with the text "INFORMATION SECURITY REMINDER" and "NRC's Internal Web site may contain sensitive information. Check with the information owner before distributing outside the agency." followed by links to "non-NRC Site", "Link to NRC Public Site", "Adobe PDF", "MS Word", "SharePoint", and "PowerPoint". The footer also includes "Content maintained by NRRWebServices" and "Last Modified: Wednesday, May 21, 2014 04:02:06 PM".

Exhibit 3 - Example of Comment Resolution Table

Resolution of Comments for

IMC XXXX (Date)

Source	Comment	Added	Remarks
R-I	The first comment is stated or paraphrased.	Yes	No remarks necessary if comment incorporated in full.
R-I	Second comment is stated or paraphrased.	No	Explain why comment not incorporated into program document.
R-II	No comments		
R-III	Xxxx xxxxx xxx xx.	Yes	Explain why, if comment only partially incorporated.
R-IV	Xxx xxxxx xxx xxxx.	Yes	...
NMSS	Xxxx xxxx xxxxx xx.	Yes	...
NSIR	Xxxx xxxx xxxxx xx.	Yes	...
OE	Xxxx xxxx xxxxx xx.	Yes	...
OGC	Xxxx xxxx xxxxx xx.	Yes	...
OIS	Xxxx xxxx xxxxx xx.	Yes	...
NRR	Xxxx xxxx xxxxx xx.	Yes	...
NRO	Xxxx xxxx xxxxx xx.	Yes	...
HR	Xxxx xxxx xxxxx xx.	Yes	...

Exhibit 4 - Example of Revision History Page

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	MLXXXXXXXX 3/17/06 CN XX-XXX	First issuance. Completed 4 year search for commitments and found none.	None	N/A
N/A	MLXXXXXXXX1 1/18/04 CN XX-XXX	Revised to include feedback from inspectors and also for editorial changes	None	N/A
C-1 Reference: Generic Letter (GL) 04-01	MLXXXXXXXX6 6/16/04 CN XX-XXX	Incorporated comments of GL 04-01	Web-based training for all power reactor inspectors 04/20/04	ML060905000
N/A	MLXXXXXX XX/XX/XX CN XX-XXX	Revised to change sample size and clarify inspection guidance. (ROPFFs XXXXX-1234 and XXXXX-1235)	None	MLXXXXXAXXX Closed FBF: XXXXX-XXXX MLXXXXXAXXX

NRC INSPECTION MANUAL

ABCD

MANUAL CHAPTER XXXX

TITLE (All CAPS)

XXXX-01 PURPOSE (All CAPS starting at third tab)

Two lines dividing each section. One line dividing paragraphs and subsections.

XXXX-02 OBJECTIVE(S) (OR POLICY)

Sections may be subdivided and paragraphed as follows (do not use 02.01 unless there is an 02.02):

02.01 Subsections. Numbered consecutively. Titles are underlined with a period at the end. Further subdivisions formatted and numbered as shown below.

a. XXXXXXXX XXXXXX XXXX XXXXXXXXXXXX X XXXXXXXX XXXXXXXX XXXX XXXXX XXXXXXX XXXX X XXXXXXXX
X XXX XXX.

b. XXXXXX, "XXX." XXXXXXXX XXXXXX XXXX XXXXXXXXXXXX X XXXXXXXX XXXXXXXX XXXX XXXXX
XXXXXXXX XXXX X.

1. XXXXXXXXXXXX X XXX X XXXXX XXXXXXXXXXXX XXXX XXXXXXXXXXXX XXXXXXXXXXXX X XXXXXXXX XXXXX
XXXX XXXX.

(a) Xxx XXXXXX XXXX XXXXXXXXXXXX XXXXX XXXXX XXXXXXXXXXX XXXXXXXXXXX XXXXX XXXXXXX
XXXX XXXXXX XXX.

(1) XXXXX XXXXXXXXXXX XXXXXXXXXXXXXXX XXXXXXXXXXX XXXXX XX XXXXXXXXXXXX.

02.02 XXXXXXXXXXXXXXXXXX. Xxx XXXX X XXXXXXX XXXXX XXXXXXXXXXX XXXXXXXXXXX X XXXX XXXXXX XX
XXXX.

Exhibit 6 - Format Requirements Checklist

Note: Refer to Exhibit 7 for instructions on how to format using MS Word.

Body of document:

- 11-point Arial font
- Justification set to left

Margins for all pages:

- Top margin at 1.0"
- Bottom margin at 1.0"
- Left and right margins at 1.0"

Headers:

- Set at 1.0"
- 11 point Arial font

Footers:

- Set at 1.0"
- Issue Date: XX/XX/XX' against left margin
- Page number in center
- Document Number against right margin
- 11-point Arial font

Tab settings for 1st line (NRC Inspection Manual in center and Originating Organization code at right):

- 3.25" Center Tab
- 6.5" Right Tab

Tab settings for body of document:

- Relative to left margin: 0.19", 0.56", 1.00", 1.44", 1.88", 2.25", 2.69", 3.13", 3.50", 3.94", 4.38", 5.19", 5.63", 6.06"
- Default tab stops: 0.42"

Tab settings for footer:

- Portrait format:
 - 3.25" Center Tab
 - 6.5" Right Tab
- Landscape format;
 - 4.5" Center Tab
 - 9" Right Tab

Page numbers:

- When there is a table of contents, do not number the title page before it.
- Number the table of contents with lower-case Roman numerals (i, ii, iii).
- Number the body of the document with Arabic numerals (1, 2, 3).

Number each new section following the body with its own prefix (e.g., E1 for Exhibit 1, Att1 for Attachment 1), followed by a hyphen, and then an Arabic numeral. Begin renumbering with page 1 for each new section (E1-1, Att1-1).

Official Use Only Document Headers/ Footers: (for SENSITIVE, Non-Public documents)
Follow the SUNSI guidance and place the required wording (e.g., "Official Use Only") centered in the headers and footers of all applicable pages.

Page one requirements:

Line 1: NRC Inspection Manual in all CAPS in bold Arial 19-point font, centered; and
originating organization code in Arial 10-point font, against the right margin.

Line 1 **NRC INSPECTION MANUAL** IRIB

Line 2: Blank

Line 3: Document title in all CAPS in Arial 11-point font, centered with horizontal line above
and below document title.

Line 3 MANUAL CHAPTER 0040

Lines 4 and 5: Blank

Line 6: Document Name in all CAPS in Arial 11-point font, centered.

Line 6 PREPARING, REVISING, AND ISSUING DOCUMENTS
FOR THE NRC INSPECTION MANUAL

Support Information for Inspection Manual Documents:

For the Table of Contents, Appendices, Attachments, Exhibits, Figures and Tables
11-point Arial font (unless otherwise stated)

Margins: Top, Bottom, Left and Right set to 1.0"

Exhibit 7 - Guidance for Using MS Word 2010

Horizontal lines above and below title:

Type three dashes in a row without spaces (---) and press the Enter key.

Margins:

Page Layout tab, click on Page Setup. Enter margins (see Exhibit 6).

Page Numbering:

Create a new section each time the page numbering or formatting changes. New sections should be created for the title page, table of contents, main body, and each attachment. To create a section break, from the **Page Layout** tab, click on Breaks and under Section Breaks, click next page.

Tabs:

Home tab, click on Paragraph (box below appears). Click on Tabs (bottom left) and enter the list of settings from Exhibit 6 for tab settings for body of document.

Adjust tabs while working on the document by highlighting text to be formatted, clicking on Paragraph, and entering:

Alignment = Left

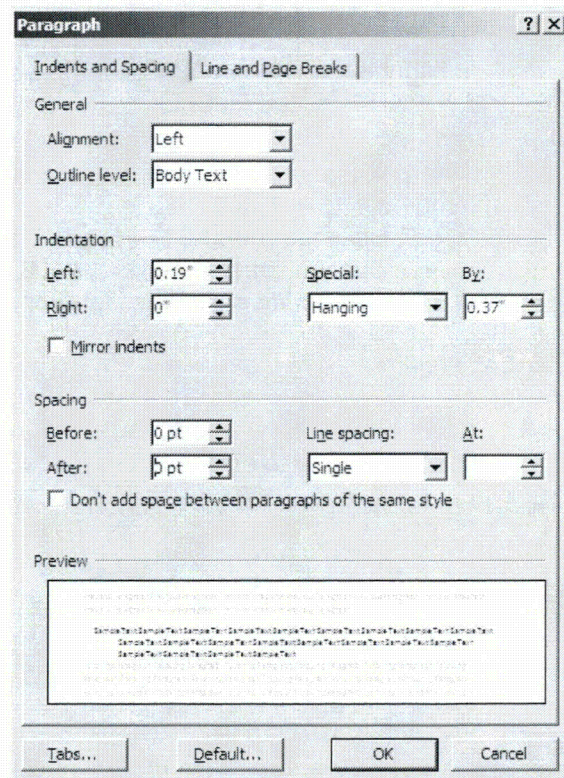
Left Indentation

- a, b, c = 0.19" Hanging by 0.37"
- 1,2,3 = 0.56" Hanging by 0.44"
- (1), (2), (3) = 1.00" Hanging by 0.44"
- (a),(b),(c) = 1.44" Hanging by 0.44"

Right indentation = 0"

Spacing Before and After = 0

Line spacing = Single



Example of formatting for a, b, c,

Note: The correct format can be copied from one section to another by highlighting text from the section you want copied, clicking on the Format Paint (brush icon), and highlighting the section to which you want the format copied.

Footers:

Insert tab, select Footer and pull down to 'Blank (Three Columns).'

For left footer, type: Issue Date: XX/XX/XX

For right footer, type: number of document

For center footer, click Insert tab, click on Page Number, (if applicable enter any prefix to the number), and select Plain Number

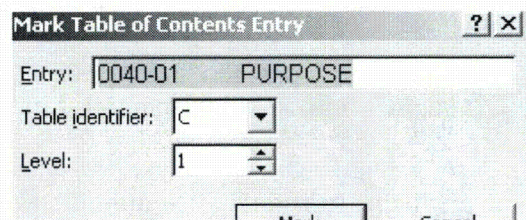
To make changes from one footer section to the next, open the Header/Footer toolbar by double-clicking in the footer. Click on 'Link to Previous,' to remove the link from the previous footer. (This is a toggle switch.)

Table of Contents:

Entries in the table of contents shall list titles and page numbers.

First mark the items you want displayed in the Table of Contents:

1. Highlight the text and hold down the keys
ALT + SHIFT + the letter O.
2. In the box that appears, select the Level Numbers
Sections (0040-01) = Level 1
Subsections (01.01) = Level 2
Add additional levels if appropriate

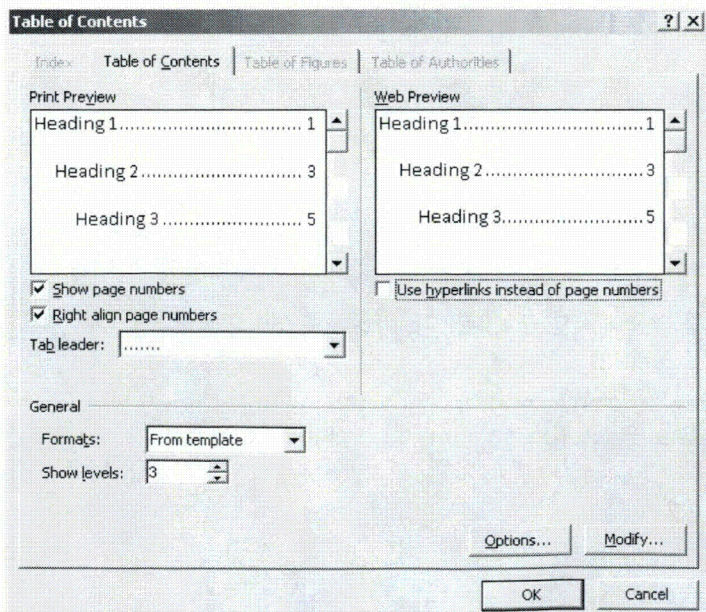


The 'Mark Table of Contents Entry' dialog box is shown. It has three input fields: 'Entry:' with the text '0040-01 PURPOSE', 'Table identifier:' with a dropdown menu showing 'C', and 'Level:' with a dropdown menu showing '1'. At the bottom right are 'Mark' and 'Cancel' buttons.

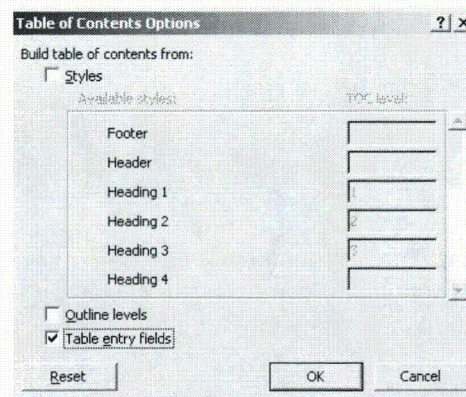
Box that appears after entering
ALT + SHIFT+ O

After all items are marked, display the Table of Contents.

3. Click on the place where you want the table of contents inserted. On the **References** tab, select Table of Contents. Pull down to Insert Table of Contents (see image below at left). Uncheck Use hyperlinks instead of page numbers and click on Options. (This brings up the image at right).



The 'Table of Contents' dialog box is shown. It has tabs for 'Index', 'Table of Contents', 'Table of Figures', and 'Table of Authorities'. The 'Table of Contents' tab is active. It has two preview panes: 'Print Preview' and 'Web Preview'. Both panes show a list of headings with page numbers: 'Heading 1..... 1', 'Heading 2..... 3', and 'Heading 3..... 5'. There are checkboxes for 'Show page numbers' (checked), 'Right align page numbers' (checked), and 'Use hyperlinks instead of page numbers' (unchecked). A 'Tab leader' dropdown is set to '.....'. At the bottom, there are 'Options...', 'Modify...', 'OK', and 'Cancel' buttons.



The 'Table of Contents Options' dialog box is shown. It has a 'Build table of contents from:' section with a 'Styles' checkbox (unchecked) and a 'Table of Contents levels' section. The 'Table of Contents levels' section has a list of 'Available styles' (Footer, Header, Heading 1, Heading 2, Heading 3, Heading 4) and a 'TOC level' column with corresponding dropdown menus. At the bottom, there are 'Reset', 'OK', and 'Cancel' buttons.

- Set the Track Changes Options to display red font and lines for changes:

In the Review tab, under Tracking, select Final Showing Markup, and then click on Track Changes/Change Tracking Options and set as follows

Markup

Insertions: Color only Color: Red

Deletions: (none) Color: Red

Changed lines: Outside border Color: Red

Comments: Red

Moves

☐ Track moves

Moved from: (none) Color: Green

Moved to: Double underline Color: Green

Table cell highlighting

Inserted cells: Light Blue Merged cells: Light Yellow

Deleted cells: Pink Split cells: Light Orange

Formatting

☐ Track formatting

Formatting: (none) Color: Red

Balloons

Use Balloons (Print and Web Layout): Always

Preferred width: 3" Measure in: Inches

Margin: Right

☒ Show lines connecting to text

Paper orientation in printing: Preserve

OK Cancel

Same as above except Deletions = Strikethrough

View the entire document to display balloons. Remove all balloons before submitting document to be issued by right clicking on each balloon and accepting the changes.

Attachment 1 - Revision History for IMC 0040

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)
C1 Reference: Davis-Besse Lessons Learned Task Force Item 3.1.2(3) and Problem Identification Form 2005- 008	ML040690209 02/02/04 CN 04-003	Revised to ensure that revisions of inspection procedures do not inadvertently delete inspection requirements that were added as a result of an event or occurrence that had generic applicability.	None	N/A
N/A	ML053210382 11/28/05 CN 05-031	Complete rewrite of document structure, add requirement for revision history page, minor revision to DIF. Completed 4 year historical CN search	None	ML053210329
N/A	ML063260070 03/05/07 CN 07-008	This document is being revised to update and clarify the processes that will be used to prepare, revise, and issue Manual documents, including processes used by the various NRC offices that conduct inspection.	None	ML070570542

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	ML071580744 06/20/07 CN 07-020	This document has been revised to establish deadlines for submission of Manual documents in WordPerfect and MS Word formats; update the Office of New Reactors' document issuing form, pursuant to Feedback Form 0040-1144; and provide greater clarity and incorporate editorial changes in response to Feedback Form 0040-1128. It also serves as a template for a Manual document in MS Word.	None	ML071580749 Closed FBF: 0040-1144 0040-1128
N/A	ML082240426 08/19/08 CN 08-024	The document has been revised to clarify instructions on the use of Microsoft (MS) Word in preparing inspection manual documents, reflect office-related requests to modify document issuing forms, respond to Feedback Forms, and make editorial improvements.	None	ML082240428 Closed FBF: n/a
N/A	ML082820151 10/29/09 CN 09-025	Relocates program office document issuing forms from IMC 0040 to the NRR Digital City website. Adds a document issuing form for NSIR. Clarifies authorization requirements for documents affecting multiple program offices. Stipulates that no new technical guidance or 10 CFR guidance documents will be issued and that these documents will be relocated in the future.	None	ML092170189 Closed FBF: 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	ML11053A009 06/02/11 CN 11-009	Improved the process: (1) all documents to have a references section which includes a list of other IPs, IMCs, or TIs that appear in the document (ROPFF 0040- 1354). (2) the document's ML number to be listed on the revision history page. (3) comment resolution summary to be an official non-public record prior to submittal to NRR. (4) For new IPs and TIs, the requirements and guidance sections are to be combined (ROPFF 0040-1645). (5) Clarified organizational responsibilities. (6) Upgraded guidance on MS Word to version 2007. (7) Made editorial improvements.	None	ML11125A085 Closed FBF: 0040-1354 ML11174A197 0040-1645 ML11174A193
N/A	ML11242A062 11/16/11 CN 11-035	Included guidance on the formatting of an Operating Experience Smart Sample. Change coordinated with development of IMC 2523, "NRC Application of Operating Experience."	None	N/A
N/A	ML12045A397 04/12/12 CN 12-005	Revised to support re-alignment with Agency documentation standards.	None	N/A
	ML12345A262 12/10/12 CN 12-028	Revised to support minor edits, address FBF 0040-1769, and add a flowchart.		ML12332A148 FBF 0040-1769

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)
	ML13176A014 08/08/2013 CN 13-016	Revised to change signature authority from DIRS Deputy Director for all change notices to only those changes that are new documents or policy changes, and allow the IPAB/IRIB Branch Chief signature authority for revisions and deletions. Add the links for the DIFs in Exhibit 2, and new guidance for temporary instruction requests.		
	ML14147A186 11/20/14 CN 14-028	Revised to provide more clarity for writing new manual chapters, inspection procedures and temporary instructions. Added signature authority for the Division or Deputy Division Director for major and policy changes, as well as issuing a new document. Included verbiage for a "Pilot" IP, which should be included in the "Special and Infrequent" inspections.		ML14323A008

NRC INSPECTION MANUAL

IRIB

MANUAL CHAPTER 0102

OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND EXAMINERS AT REACTOR FACILITIES

0102-01 PURPOSE

Periodic industry feedback and internal reviews have identified the need for continued management involvement and oversight of NRC activities conducted at reactor facilities. This chapter describes the policy for management involvement and oversight of inspections, operator licensing examinations, audits, and other on-site inspection related activities at reactor facilities. This policy is intended to ensure the effective direction of activities, communication, and inspector objectivity at reactor facilities. Objectivity is the extent to which the inspector or examiner implements the NRC's programs, interfaces with the public and conducts both personal and work relationships in an unbiased manner, free from both partiality and antagonism toward a licensee or vendor, or the employees of a licensee or vendor, as evidenced by patterns of the inspector's or examiner's actions.

0102-02 POLICY

02.01 General

- a. Every level of management must clearly communicate to its subordinates the Agency's expectations regarding the duties of inspectors and examiners and the principles to be applied in the performance of those duties.
- b. Only trained and qualified individuals having the knowledge and aptitude to perform on-site activities in a manner consistent with Agency expectations should be assigned to perform independent on-site activities.
- c. When on-site activities are initiated, line managers must oversee those activities to ensure that the Agency's expectations and principles regarding inspectors and examiners are satisfied.
- d. There are no restrictions on the number of site assignments or total time in position for resident inspectors provided that the performance of the resident inspector remains acceptable as defined by Management Directive 10.67, "Non-SES Performance Appraisal System." Hence, resident inspectors and their managers should maintain the flexibility to make job assignments and career decisions in the best interest of both the NRC and the individual.
- e. All resident inspectors have a 7-year maximum length of tour. This policy does not preclude resident inspectors from relocating for promotions, voluntary reassignments, or management-directed reassignments.

- f. Throughout this manual chapter the term employee applies to all NRC technical staff who performs independent inspections or examinations at power reactor facilities. The term inspections apply to inspections, examinations, audits, and reviews conducted by NRC technical staff at power reactor facilities.

02.02 Observations. To assess the adequacy of program guidance (e.g., inspection procedures, tools, and resources) and verify the adequacy of employee performance, line managers must directly observe on-site activities. Those on-site observations should assess the adequacy of program guidance and the following individual performance attributes:

- a. Safety perspective and the application of safety principles during on-site activities.
- b. The adequacy of technical training and preparation for the on-site activity.
- c. Knowledge of applicable regulatory requirements, procedures and guidelines (e.g., 10 CFR, NRC Inspection Manual, inspection procedures, updated final safety analysis reports (UFSAR), Operator Licensing Examination Standards, NUREGs, regulatory guides, and industry codes and standards).
- d. Adherence to agency-wide regulatory positions and policies (e.g., backfit) and avoidance of personal interpretations and opinions.
- e. Employee objectivity considering the employee's experience, technical expertise, site familiarity, industriousness, overall effectiveness, external and internal pressures, and differences of opinion based on valid technical merit.
- f. Employee demeanor, professionalism, and interpersonal skills (e.g., ability to communicate accurately and effectively with licensees).
- g. Effective on-site activity techniques, including in part, evidence of good preparation, a performance-based focus, selection of risk-informed samples, emphasis on direct observation of activities, use of in-depth probing where appropriate, and sufficient emphasis on independently verifying licensee provided information.

02.03 Other Oversight. Direct observation alone is not sufficient. Line managers must take an active role in the on-site activities that they oversee. They must engage their employees in open, two-way communication regarding their inspection or examination findings so that both parties fully understand the issues and the appropriate regulatory approach to those issues. By sharing their perceptions, opinions, and philosophies, employees will gain a better understanding of what their supervisors expect of them and supervisors will gain valuable insights to the capabilities and shortcomings of their employees and the inspection program. Similarly, reviews of inspection reports, peer reviews, involvement in enforcement actions, senior management debriefings, management self-assessments, involvement in developing mid-cycle and end-of-cycle assessment reports, and feedback from licensees can provide additional insights to the conduct, objectivity, and performance of employees and managers as well.

0102-03 DISCUSSION OF POLICY

Line management is responsible for overseeing employees that conduct on-site activities at reactor facilities by clearly establishing and communicating performance expectations, providing staff development opportunities, evaluating feedback from reactor licensees, and ensuring that on-site activities are performed as intended. Employees should be considered for recognition when management finds them exhibiting outstanding performance, superior technical expertise, continuing sound judgment and professional behavior. Management is expected not only to hold the staff accountable for its actions when instances of performance or conduct inconsistent with Agency positions or supervisory expectations are detected, or an employee's objectivity is questioned, but also to address any staff developmental needs to prevent recurrence of the inappropriate action. Circumstances may arise which require greater management involvement above the levels described in these guidelines.

0102-04 OVERSIGHT AND OBJECTIVITY REQUIREMENTS AND GUIDANCE

04.01 General. The requirements and guidance provided in section 0102-04 are to be used by NRC managers to verify employee performance and objectivity by direct observation of on-site activities at power reactor facilities and through other available indirect methods as needed. On-site activities include individual or team inspections, examinations, audits, visits, and reviews. NRC employees should use the applicable guidance and requirements of this section in the performance of their on-site activities.

04.02 Individual Inspectors, Team Leaders, and Examiners

- a. Inspectors, team leaders, chief examiners, and other staff who lead NRC on-site activities should develop an appropriate plan, brief and receive approval from the line supervisor responsible for the activity on their planned activities, and should provide a copy of the inspection, examination, or audit plan to the responsible regional office Division of Reactor Projects (DRP) supervisor before the on-site activities begin.
- b. All NRC staff who leads NRC on-site activities will conduct an entrance meeting with the principal facility personnel before beginning on-site activities. The senior resident inspector (SRI), or the resident inspector in the SRI's absence, should be invited to all entrance briefings.
- c. All NRC staff who leads NRC on-site activities should brief the immediate line supervisors responsible for the activity and the SRI regarding their findings before any exit meeting with the facility licensee takes place.
- d. Inspectors, team leaders, chief examiners, and other staff who lead or participate in NRC on-site activities shall maintain a professional, objective relationship with licensee management and staff.

04.03 Senior Resident Inspectors

- a. SRIs should routinely brief their immediate supervisor on resident inspection issues and findings and should keep their supervisor informed of scheduled exit meetings.

- b. SRIs should keep abreast of all NRC on-site activities at the facility to which they are assigned. However, minor issues should not be tracked or trended.
- c. SRIs should attend entrance and exit meetings. If the SRI is unavailable, other resident inspectors should attend in their place. For economy of time, meetings for multiple on-site activities should be combined whenever possible.
- d. To enhance objectivity, SRIs and resident inspectors shall spend a minimum of one week each year inspecting at another site. This inspection may be accomplished by participating in a team inspection at another site, or by visiting their backup site for familiarization.

04.04 Line Managers

- a. Line managers should keep abreast of on-site activities conducted by employees over whom they have supervisory authority.
 - 1. Line managers should discuss on-site activity plans with their employees before on-site activities begin to ensure the employee's activities are properly scheduled, coordinated and focused.
 - 2. Regional DRP line managers should talk with their resident inspectors at each of their sites several times a week.
 - 3. Line managers responsible for an on-site activity should discuss the findings and concerns with the employees assigned to the activity before the facility exit meeting is held. Discussions should focus on potential safety and regulatory approaches to issues to ensure mixed messages are not sent to the licensee.
 - 4. Line managers will oversee significance determinations of inspection findings and any enforcement decisions involving facilities or activities for which they are responsible.
 - 5. Line managers should attend at least one exit meeting annually to observe their subordinate inspectors. This expectation can be accomplished by attending an exit meeting for their subordinate resident and specialist inspectors if significant inspection or examination findings (e.g., potentially greater than green significance, possible escalated enforcement or unsatisfactory requalification examination) will be discussed. Appropriate line manager shall attend team inspection exit meetings as directed by their division directors and should supplement the discussion at the meeting, as necessary.
 - 6. Line managers responsible for an on-site activity should promptly and thoroughly debrief the assigned employees after the employees leave the site. Line managers must promptly intervene and communicate any changes in findings or conclusions to DRP management, and shall promptly contact the licensee to discuss the changes if necessary.

7. DRP line managers shall ensure the resident inspectors conduct inspections to maintain access to and familiarity with their backup sites or, if not assigned a backup site, are annually assigned to an inspection at another site. These efforts should be coordinated to ensure adequate site coverage is maintained at all reactor sites.
- b. Line managers should ensure that their division director and the regional DRP division director are promptly informed of significant safety and regulatory issues identified by employees whom they supervise.
- c. Line managers shall ensure that inspectors do not track or trend minor issues. This means that line managers shall ensure that inspectors are not performing data analysis and charting of minor issues.
- d. Line managers from the region and Office of Nuclear Safety and Incident Response (NSIR), responsible for the Force-on-Force inspections shall observe each of their employees, if practicable, during an on-site activity at least once a year. During their site visits, line managers may accompany any or all of their employees who are on site at the time of their visit. In addition, DRP line managers should visit one of the sites they are responsible for once a quarter. These visits may be combined (i.e., accomplished on one trip rather making two separate trips) for plants which are collocated or nearby (e.g., Salem/Hope Creek; Fitzpatrick/Nine Mile Point; and Kewaunee/Point Beach). These visits should typically include a tour of the RCA. DRP line managers shall maintain unescorted access authorization at each of their sites. A DRP line manager, branch chief or higher, should typically tour the containment with one of the resident inspectors during each plant refueling outage.

Regional operator licensing managers should alternate their field observations between examination and inspection activities for their employees who are certified in both areas. When observing an examination, the manager should accompany the examiner during a complete operating test. Part-time (i.e., reserve) examiners are also subject to periodic observation and evaluation while administering operating tests. These observations shall:

1. be performed at least every 24 months by the regional operating licensing branch chief or a certified chief examiner, and
2. cover at least half of a walk-through (i.e., 5 system job performance measures and 2 administrative topics) and at least one simulator scenario.

These observations are in addition to and do not replace the annual accompaniments required by the part-time examiner's supervisor.

- e. Line managers should continuously assess the performance of their assigned employees using a combination of direct observation of the employees' activities during site visits and the review of their performance as portrayed in inspection or examination reports, telephone conversations, and other indirect methods. A line manager's site visit should be of sufficient duration to supplement the indirect methods of assessing the performance of their subordinate employees. Line managers should focus on the following applicable areas related to assessing their subordinate employees:

1. Does the employee independently verify information from the licensee when appropriate?
 2. Does the employee adhere to NRC regulatory positions and policies when discussing issues with licensee or NRC management, avoiding personal interpretations and opinions?
 3. Does the employee maintain a professional relationship with the licensee using good interpersonal relationship skills?
 4. Has the employee provided an accurate and balanced account of licensee performance and plant conditions in communications with NRC regional management via inspection reports, telephone calls, or other means?
 5. How do licensee staff and managers respond to the employee's questions or concerns?
 6. Is the employee focused on safety significant concerns, applying significance determination and enforcement guidance appropriately?
 7. Does the employee develop issues without biased interpretation of facts?
 8. Are findings adequately supported by the facts?
 9. Does the employee conduct exit interviews in accordance with NRC policies and practices?
- f. Line managers should tour the facility during their site visits. Facility tours should include those areas the employees would normally tour on a routine basis. DRP line manager tours should include an overview of control room activities and inspector interactions with control room staff. The tour should be used to provide the line manager with insights regarding how well the licensee performs and how well the employee has characterized the licensee performance in communication with NRC regional management.
 - g. During site visits, line managers should make every effort to have discussions with maintenance, operations, radiological controls, engineering and technical support, quality control, and senior site managers as applicable. These discussions should include quality of licensee interactions with NRC employees or team inspections. Have there been significant conflicts or concerns with findings or the manner in which findings were communicated to the licensee?
 - h. Line managers should meet individually with their employees to discuss on-site activity-related performance and objectivity issues observed during each site visit.
 - i. Line managers shall annually document the objectivity of their assigned employees. The documentation should address each item of 02.02 a through g that is applicable to the employee and activity reviewed. When patterns tend to indicate a loss of objectivity, corrective measures should be immediately implemented by regional management.

04.05 Division Directors

- a. Division directors should meet with their subordinate line managers on a regular basis (e.g., weekly) to discuss on-site activities, including significant findings, trends, and potentially generic issues. Their level of involvement should be proportional to the significance of the findings. They shall ensure that an appropriate NRC manager is present at those on-site activity exit meetings where findings have resulted in an apparent significant finding.
- b. Division directors or their deputies should average one site visit a month to monitor on-site activities for which they are responsible. The DRP division director or deputy should make every effort to visit each site at least once every two years. These visits should typically include a tour of the RCA in the accompaniment of a site inspector. The DRP and DRS division directors or deputies should consider making contact with individual licensee managers or unit managers as appropriate to the ongoing and/or apparent, security or regulatory impact issues at the site. During site visits, DRP or DRS division directors and their deputies should focus their observations on ongoing and/or apparent safety and security issues. Also, they should overtly solicit feedback from their licensee counterparts regarding implementation of the NRC regulatory programs at their facility. Division directors must evaluate the validity of the licensee's adverse comments and initiate appropriate action to correct the problem. See section 0102-05, below. In addition, the DRP director or deputy should hold a brief personal discussion with the SRI and/or resident inspector of each site periodically (i.e., about quarterly) to discuss ongoing and/or apparent safety, security or impact issues; this discussion may take place during a site visit, during an inspector's visit to the regional office for other agency business, during a periodic inspection debrief, or by telephone.
- c. Division directors shall ensure that the regional administrator is informed of all significant safety, security and any issues related to NRC employee performance, identified by or resulting from NRC on-site activities.
- d. Division directors and their deputies should periodically assess their activities to confirm that oversight activities are being performed.

04.06 Regional Administrators

- a. Regional administrators, or their deputies, are responsible to ensure sufficient routine management communication with each employee to maintain oversight and monitor objectivity of the employees when they are on site.
- b. Regional administrators or their deputies are responsible for monitoring regional management activities and visiting sites to ensure that all sites receive adequate attention and that all on-site activities receive adequate safety, security and management oversight.
- c. The regional administrators shall ensure that the appropriate NRR manager is informed of all significant issues.

- d. Regional administrators or their deputies should average one power reactor site visit a month. During their site visits, regional administrators should focus their observations on ongoing and/or apparent safety and security issues. Also, they should overtly solicit feedback from their licensee counterparts regarding implementation of the NRC regulatory program at their facility. Regional administrators must ensure that adverse comments are validated and appropriate corrective actions are initiated. See section 0102-05, below. Further, Regional Administrators or their deputy should seek opportunities for public outreach as appropriate. This might include attendance at public exit meetings and other outreach opportunities, as appropriate. Consideration of public outreach should be consistent with the Action Matrix guidance.
- e. Regional Administrators should make sure that licensees are aware that there are multiple tiers for raising concerns. Concerns regarding regional staff performance should be raised with the Regional Administrator, but concerns regarding the Regional Administrator should be raised to the EDO.

0102-05 Site Visit Observation Form (NRC Form 649)

A Site Visit Observation Form will be used to document ongoing and/or apparent, security or regulatory impact observations, including inspector objectivity, made during Senior Regional Manager Site visits. The specificity of comments should be adequate to convey the safety, security or regulatory impact issue so that meaningful communications can occur; however, a detailed account of the issue is not required. Issues related to security should only be documented if they relate to regulatory impact issues. It is not intended that this Form document safeguards issues. It will include documentation of actions deemed appropriate by the Regional Administrator or Deputy Regional Administrator.

NRR regularly reports to the Commission the results of feedback from licensees on the impact of our activities.¹ An important part of the report is an analysis of the feedback solicited by regional managers during periodic visits (sections 04.05.b and 04.06.d, above). The feedback obtained from licensees by regional managers must be forwarded to the NRR Division of Inspection and Regional Support (DIRS), Performance Assessment Branch (IPAB). The feedback should be reported to IPAB on NRC Form 649, "Site Visit Observation," which is available through the DIRS Sharepoint site at the provided link. As noted on the form, the completed form can be emailed to FeedbackROP.resource@nrc.gov and/or a hard copy forwarded to the IPAB Branch Chief. Note that there is a "Submit Via Email" at the bottom of the form that will automatically forward your completed form to the appropriate email address.

END

¹ SRM, "SECY-91-172—Regulatory Impact Survey Report—Final," dated December 20, 1991, required the staff to implement a process to gather feedback from licensees and to annually report the results of the process to the Commission.

Attachment 1
Revision History for IMC 0102

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	08/22/05	Revision history reviewed for last four years	N/A	N/A
N/A	ML12012A053 04/24/13 CN 13-012	IMC 0102 was changed to reflect current expectations on line management observation of NRC inspectors and improved routing of site visit observation forms. FFs 0102-1237; -1384; -1598; -1617; -1618; and -1648 were closed.	N/A	ML13032A115 ML13043A135 ML13043A139 ML13043A142 ML13043A156 ML13043A159 ML13043A164