

Comment Resolution Summary (ML17164A299)

Resolution of Comments for IMC 0611 Power Reactor Inspection Reports (ML17150A030)

Date: June 2017

Source	Section #	Comment	Added	Remarks
OE		None		
NRR		None		
NSIR	13.03	The statement "Security inspection reports must not be used to document inspection activities or findings that fall outside of the security cornerstone unless otherwise directed." Why? There is no characterization of "who" provides the direction.	N/A	Non-security matters should be documented in reports which are available to the public. Revised to "Security inspection reports should not be used to document inspection activities or findings that fall outside of the security cornerstone."
R1		None		
R2		None		
R4		None		
R3-1	General	Various - Revise "Inspectors" to "The inspectors" in various sections.	Yes	Fixed.
R3-2	General	Various - Revise "Green, Non-Cited Violation" to "Green Finding and an Associated Non-Cited Violation"	Yes	Fixed text provided in the example in 5.01.f.
R3-3	0611-06	Page 13 – Revise "OTHER ACTIVES" to "OTHER ACTIVITIES"	Yes	Fixed.

Source	Section #	Comment	Added	Remarks
R3-4	05.01.f	<p>Revise “Identify the requirement or standard that was not met and the assignment of identification (i.e., self-revealed, NRC-Identified, or licensee-identified).”</p> <p>To “Identify the requirement or standard that was not met; the significance; and the assignment of identification (i.e., self-revealed, NRC-Identified, or licensee-identified). For violations, include the requirement violated and whether it’s an NOV, AV, or NCV.”</p>	Yes	Revised to “Identify the requirement or standard that was not met, the significance, and the assignment of identification (i.e., self-revealed, NRC-identified, or licensee-identified). For violations, indicate whether it is an NOV, AV, or NCV.”
R3-5	N/A	<p>IMC 0612 Figures 1 and 2 need to be revised to reflect IMC 0611 documentation. For example, Block 2 (No) states to document in accordance with 0612-09.</p> <p>Also, IMC 0612 references 4OA7 which doesn’t exist in IMC 0611</p>	N/A	Feedback provided to the IMC 0612 lead and revisions will be made.
R3-6		<p>It is not clear how this report is to be formatted. An example is necessary.</p> <p>For example....closure of a cited violation.....where does this paragraph go? Is it “floating” between issues identified under the inspectable area?</p>	Yes	<p>Document the closure in the scope section of the report associated with the sample or inspection activity used to inspect the NOV’s closure. An example some NOV’s will be addressed in 9500X inspection activity. This is very similar to an LER review. Added clarification beyond that contained in Section 14.07 to help one understand how to organize the report.</p> <p>Sample reports have developed to help staff understand.</p>

Source	Section #	Comment	Added	Remarks
R3-7	03.01	States "A FIN is a subset of all findings." FIN is being defined because of RRPS. Recommend stating "A finding with an associated violation will be designated as AV, NCV, or NOV"	Yes	Revised to "03.01 FIN. A Reactor Program Systems (RPS) item type used to describe a finding without a violation. A finding with an associated violation(s) or violation(s) dispositioned using traditional enforcement without a finding will be designated as AV, NCV, or NOV."
R3-8	03.04	VIO does not exist in RRPS (anymore). Recommend deleting this definition.	Yes	Deleted.
R3-9	0611-05	Highly recommend showing a completed table somewhere in this document. It is not clear which are titles to be kept and which are not. For example, do we have a header for corrective actions or is it a sentence or two located one paragraph space below the description section?	N/A	A sample report is planned for in support of staff training.
R3-10	05.01.c.1	Highly recommend showing an example to ensure consistency: Green NCV 05000XZY/2017003-01 Closed	N/A	Each line already has an example shown in this section. Additional support will be provided through training and a sample report.
R3-11	05.01.d	Need a statement in the event no CCA was identified. Otherwise, it will look like the inspector forgot to fill in the block. Recommend: "None"	Yes	Added: "When no CCA is assigned enter "None."
R3-12	05.03.b	Define the level of detail desired. This is where completed finding box would be helpful.	No	0611 provides sufficient level of detailed to be documented. Consistency will be address with training and a sample report.

Source	Section #	Comment	Added	Remarks
R3-13	05.03.c.1	Repeated data. Is it necessary to repeat the cornerstone and color?	No	Yes, so this part of the write-up can stand alone.
R3-14	05.04	Recommend adding "Section 2.1.5 of Part II of the Enforcement Manual"	Yes	Added: "Additional enforcement related guidance can be found in the Enforcement Manual." Reference the manual sections is problematic because they keep changing.
R3-15	05.04 c.1	Typo...."a Non-Cited" not "an Non-Cited"	Yes	Fixed.
R3-16	0611-06	Typo...."ACTIVITIES" spelled incorrectly.	Yes	Fixed.
R3-17	0611-06	Table title...."Closed Unresolved Items When No Issues Are Identified". When a Finding or violation is identified during the closure of a URI, the respective box requests the URI closed tracking number.	Yes	Title was incorrect. Revised title to: "Table 6 – Closed Unresolved Item – No Finding or Violation Documented using Section 0611-05"
R3-18	0611-06	Typo: staff not staff(s).	Yes	Fixed.
R3-19	General	IMC 0612 Figures 1 and 2 need to be revised to reflect IMC 0611 documentation. For example, Block 2 (No) states to document in accordance with 0612-09. Also, IMC 0612 references 4OA7 which doesn't exist in IMC 0611	N/A	See response to R3-5.

Source	Section #	Comment	Added	Remarks
R3-20	07.01.c	<p>States: Note: Only items which are opened as a result of inspection need to be closed in the written report. Items may be opened in RPS to track planned inspections active activities. Examples may include Licensee Event Reports (LERs) samples, Temporary Instructions (TIs), and Confirmatory Action Letter (CAL) related inspections. These sorts of tracking items shall not be captured in the written report tracking section. The documentation of actual inspection activity performed in the report is all that is needed similar to baseline inspection samples.</p> <p>This paragraph seems out of place. Why is it under “discussed open items?”</p> <p>Also, LERs, CAL, and TIs are required to be closed so it is not clear how to apply this paragraph.</p> <p>Since “Open Items” is defined in the sentences immediately following 07.01, this paragraph is not needed.</p>	Yes	Removed “Note” in order to support manual the manual update of the RPS system by administrative staff.
R3-21	0611-08	Need a statement that licensee identified violations are to be placed in the inspectable area section of the report.	Yes	Revised.
R3-22	0611-09	Need a Table for identifying and closing a minor violation (to be used for LER closures and TI issues).	Yes	Minor violations and minor performance deficiencies are to be discussed in a table in the results section of the report only when documentation is warranted.

Source	Section #	Comment	Added	Remarks
R3-23	0611-10	Need a statement that the NOV closure is documented in the inspectable area. Also need a box.	No	NOV closure can be documented in the inspection scope/assessment. For example a supplemental inspection report's conclusion that the IP objectives are met and the NOV can be closed does not need to be placed in box.
R3-24	0611-11	Reference in box should be 11.01. not 12.01	Yes	Revised
R3-25	14.03	No clear what "finding and violation header summary" means. Recommend either defining this in a previous section or stating "box with Title through Introduction Section"	Yes	Deleted sentence to remove confusing language.
R3-26	14.06	Scope paragraph – not clear on whether this paragraph applies to ALL scopes (placed in ONE location) or whether this is to be copied in each Scope Section. If it is a generic scope section, recommend adding it to Exhibit 1 to clearly show where it is to be placed.	Yes	Clarified text so that it is to be copied only once.
R3-27	14.06	Are observations to be placed in a box format?	N/A	Yes This was clarified by revising Section 0611-12 and Section 14.06
R3-28	14.06	It is also not clear where "Observations" are to be placed.....are we using the "a. Inspection Scope" 'b. Findings" format"? If so, will "b" be "b. Observations" "c. Findings?"	Yes	This was clarified by revising Section 0611-12 and Section 14.06

Source	Section #	Comment	Added	Remarks
R3-29	14.06.d	Discussion of graphics and visuals should be placed with inspection results as it is more likely/appropriate for this media to be associated with the results (description section), not scope.	No	Graphics can be in the scope section, especially in the case of reactive inspection reports.
R3-30	14.10	INPO is "Institute of Nuclear Power Operations"	N/A	Spelled out first time in Section 13.01
The following Comments were provided on November 27, 2017 via NCP-2017-014a "Issues with unknown or unconfirmed resolution:"				
R3-NCP-01	0611-11	Describes the closure of Licensee Event Reports. At the bottom of the section, it states, "Any findings and violations identified during the LER review, including violations which are minor, must be dispositioned in the report." During my review of the Palisades streamlined report, I commented that the streamlined report was missing the minor violation. At last check, the violation was not included. It is not clear whether NRR intends to revise the Palisades streamlined report to include the minor violation or revise IMC 0611. If a revision of IMC 0611 is selected, this needs to be discussed with the Office of Enforcement and the Regional contacts.	N/A	While this comments is not directly related to IMC 0611, the palisades report will be updated to reflect the change.

Source	Section #	Comment	Added	Remarks
R3-NCP-02	0611-12	Describes minor violations and how these are to be documented in the scope section of the inspection report. It also states observations are to be placed in the Results section of the report. During a discussion with the responsible NRR Branch Chief, I noted that I would interpret minor violations as observations and place the minor violations in the Results sections (my preferred location). He stated he would talk to the program owner and resolve this. Draft IMC 0611 Exhibit 2 will also need to be changed to reflect minor violations documented in (1) observation section (if decided) or (2) in a separate box specific to minor violations (3) or kept in the Scope section (explanation on why will be needed). It is not clear on how this was resolved.	Yes	<p>IMC 0611 shows observations being placed in a box (Comment R3-27) and to be located in the results section. Minor violations and minor performance deficiencies are to be discussed in the results section of the report only when documentation is warranted.</p> <p>IMC 0611 exhibit 2 will also be updated.</p>

Source	Section #	Comment	Added	Remarks
R3- NCP-03	13.02	<p>Acknowledges inspections that are non-routine. Temporary Instructions are common and the inspectors need to know how to document both the scope and results of the inspection. The translation of a temporary instruction write up from the existing format to the new format in the Palisades streamline report was confusing as the issue was actually placed in an Inspection Procedure and not in the Temporary Instruction section. While there was agreement to modify this section, this revision is needed prior to implementation.</p> <p>The resolution may or may not impact Draft Revision 1....(1) document the findings under the heading of the TI and the rest of the TI observation or required documentation under an Observation box – no change to IMC 0611; or (2) create a new box specifically for Temporary Instructions – change to IMC 0611.</p>	<p>N/A</p> <p>No</p>	<p>While this comment is not directly applicable to IMC 0611, boxes are reserved for inspection results, which currently includes observations which may be related to a TI.</p> <p>However, the following clarifying text has been added to IMC 0611:</p> <p>“Temporary Instructions or other non-routine procedures may provide more specific documentation instructions which take precedence over IMC 0611. If clarification is needed on proper integration into the report, contact the program office.”</p>

Source	Section #	Comment	Added	Remarks
R3-NCP-04	14.03.b	Describes the summary paragraph for each finding/violation. I identified a concern with respect to the shortened statement and its impact on the Plant Issue Matrix. Specifically, the shortened summary of findings information decreases search function for RRPS report IR 3-4. This impacts our ability to perform some searches. For example, to support NOT removing one of the more than minor questions, I performed a search in the PIM for "if left uncorrected." Using the current PIM information, this search resulted in meaningful information for assessment. Using the proposed wording for the PIM (Introduction Section), nothing will be displayed because this information is NOT located in the "description" field. An agreement was reached which impacted IMC 0306 and did not impact IMC 0611. However, it is not clear on whether this change to IMC 0306 will be timely with the implementation of IMC 0611. It was not clear whether interim guidance will be provided to the Regions to address the shortened summary section and the need to place additional information in RRPS to ensure acceptable PIM entries. This solution is currently not in the training planned for the December Counterpart meeting.	N/A	While this comment is not directly applicable to IMC 0611, DIRS is working with regional counterparts to develop interim guidance to provide to inspection staff.
R3-NCP-05	14.03 c	Describes additional tracking items. During a working group meeting on November 16, it was agreed that this table would include temporary instructions, Confirmatory Order, or Deviation actions. I understand a change was made to Section 14.03.c of Draft Revision 1; however a change is needed to Section 07.01 and the Palisades streamlined report.	N/A	IMC 0611, section 07.01 does not prohibit tracking these items in the issued report. No change needed.

Source	Section #	Comment	Added	Remarks
R3-NCP-06	14.06 a	Provides a general statement regarding inspection scopes. The inspector is to include the following statement, "Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted." In an email in which I attached a proposed revision on how to handle triennial engineering inspections, I commented that the scope section title needed to be the actual inspection procedure title to align with the statement above. In other words, we should not make up a procedure that doesn't exist. For example, IP 71111.05 does not exist. IPs 71111.05AQ, 05XT, and 05T exist and should be used in the same manner as other inspection procedures (for consistency). It is not clear whether a change will be made to the template, Exhibit 1 and Palisades streamlined report or if an explanation on the acceptability of this inconsistency will be provided in the appropriate Comment Resolution document.	Yes	IMC 0611 Exhibit 1 will be updated to reflect a report section for each baseline IP.

Source	Section #	Comment	Added	Remarks
R3-NCP-07	14.06 b	Describes a typical scope section which includes a brief statement and the actual activity observed. In the draft Dresden Streamlined Design Bases report, the scope section contains the components and attributes. Each of these are counted as a sample. In my comments on this report, I queried how were we to handle inspection activities that are not considered samples, yet important to document. For example, in IP 71111.21M, the team reviews previous NCVs and lists them in the inspection report. Since these NCVs were already reviewed, the Problem Identification and Resolution team would not need to duplicate this inspection. It is not clear if this comment (to include a scope section for this activity) was accepted and if not, why not.	N/A	<p>While this comment is not directly applicable to IMC 0611, the guidance requires the inspectors to document information that may be needed to support future inspection planning and assessment.</p> <p>Section 0611, Section 14.09 states, "Documents recorded in the official agency record or report must have appropriate informational value to warrant preservation. Documents critically reviewed during the completion of the inspection, generally do not need to be listed unless they are needed to support effective regulatory oversight."</p> <p>In this case mentioned, these documents need to be recorded for future inspection planning and as such they should either be listed in the scope or documents reviewed section of the report as appropriate.</p>
R3-NCP-08	14.06 b	Provides an example of a typical scope section for a complete sample. Currently, only a training slide provides information on how to document a partial sample – either upfront or completing a partial sample. Guidance needs to be placed in IMC 0611. Such guidance was not necessary in IMC 0612 because the inspector documented the specific activities performed during that time period. It is not clear how this issue was resolved from an IMC 0611 perspective.	Yes	Added partial sample example to Section 14.06 b.

Source	Section #	Comment	Added	Remarks
R3-NCP-09	14.06 c	Describes the use of Graphics. It is located in the Scope section of the instruction. Since the graphics will likely be used in the description of an issue (finding/violation/unresolved item), the instruction of using a graphic should be placed in the Results section.	Yes	Moved from Section 14.06 to Section 13.07. How to handle graphs is general and not specifically limited to the scope or results section of the report.

Source	Section #	Comment	Added	Remarks
R3-NCP-10	0611-14.03b.	<p>The current version of IMC 0612 requires the inspector to document issues in the order of importance. The proposed version of IMC 0611 states to “organize the tabled information documented using section 0611-05 to align with the inspection scopes.” It further states to follow -07, -08, and -11 afterwards. There is no mention of importance. This results in the following order of items documented (regardless of significance):</p> <p>Table 1 – Finding without Violation (FIN) Table 2 – Finding with Violation Table 3 – Traditional Enforcement Violation Table 4 – Finding with Traditional Enforcement Violation Table 5 – Open Unresolved Item Table 6 – Closed Unresolved Item – No Finding or Violation Documented using Section 0611-05 Table 7 – Discussed Item Table 8 – Licensee Identified Violation Table 9 – Enforcement Discretion Table 10 – Observation</p> <p>I recommended re-adding the statement “Present the findings and violations within each report section in order of importance.” Then the program office can establish to follow Tables 5 – 10 in any preferred order.</p>	Yes	Agreed, revised to read “Organize the finding and violation header summaries by the order they appear in the report. When an IP has multiple findings, further organize by the significance/importance within the IP Results Section.”

Source	Section #	Comment	Added	Remarks																
R3-NCP-11	14.07	States that if no findings or violations were identified, the report will state "No findings were identified" in the inspection Results section. In the draft Dresden Streamlined Design Bases report, the Results section was removed. It is not clear if the Results section was over looked (modify the draft streamlined report) or if the Results section was intentionally removed (modify IMC 0611).	N/A	Additional clarification was provided in IMC 0611 section 14.07																
R3-NCP-12	Not Specified	<p>Inspection Samples as defined in the Template report are not consistent with the titles in the inspection procedure and/or with the titles in RRPS. I presented 2 examples and communicated I did not have time/resources to confirm all of the sample names. For example:</p> <table border="1" data-bbox="401 797 1062 1138"> <thead> <tr> <th></th> <th colspan="3">Sample Name</th> </tr> <tr> <th>Procedure</th> <th>Proposed Report</th> <th>IP</th> <th>RRPS</th> </tr> </thead> <tbody> <tr> <td>71111.04</td> <td>Partial Walkdown</td> <td>Partial Walkdown</td> <td>Equipment Alignment</td> </tr> <tr> <td>71111.05</td> <td>(02.01) Fire Areas</td> <td>(02.01) Quarterly Inspection</td> <td>(02.01) Quarterly inspection</td> </tr> </tbody> </table> <p>Although I believe a solution was reached, it is not clear how this was captured nor the timeline to correct the discrepancies. It is also not clear if anyone continued my review to identify other instances.</p>		Sample Name			Procedure	Proposed Report	IP	RRPS	71111.04	Partial Walkdown	Partial Walkdown	Equipment Alignment	71111.05	(02.01) Fire Areas	(02.01) Quarterly Inspection	(02.01) Quarterly inspection	N/A	While this comment is not directly applicable to IMC 0611, inconsistencies have existed prior to the issuance of this revision. The goal is to have consistency with nomenclature between the IPs, RRPS and what is documented in the report. The intent of the template is to serve as a tool to implement the IMC and therefore not being formally issued using IMC 0040. DIRS will continue to align IPs, RRPS, and templates as we work through implementation of streamlined inspection reports.
	Sample Name																			
Procedure	Proposed Report	IP	RRPS																	
71111.04	Partial Walkdown	Partial Walkdown	Equipment Alignment																	
71111.05	(02.01) Fire Areas	(02.01) Quarterly Inspection	(02.01) Quarterly inspection																	

Source	Section #	Comment	Added	Remarks
R3-NCP-13	14.06 b.3	Performance Indicators are reviewed by several inspectors. The data range reviewed by the inspectors vary. Currently in the Palisades streamlined report, a single date range is provided for all of the performance indicators. During a working group meeting, the need to use different date ranges for each performance indicator was discussed; however, it is not clear how this was addressed. (Based on the report being used in the December training, this issue has not been addressed.)	N/A	IMC 0611 allows the flexibility for inspectors to provide the appropriate date range(s) as necessary. The template only provides inspector guidance and inspectors should modify the format as appropriate.
The following Comments were provided on November 27, 2017 via NCP-2017-014b "New items:"				
R3-NCP-14	04.01	States inspection reports consist of "a cover letter, a summary, inspection details, and supplemental information." The use of "inspection details and supplemental information" is a holdover from IMC 0612. This new format does not use this terminology. IMC 0611 will need to be revised.	Yes	Agree. Some reports such as final determination letters lack many of these elements. IMC 0611 Section 04.01 was revised to read: "Document inspections in accordance with the direction provided in this IMC."

Source	Section #	Comment	Added	Remarks
R3-NCP-15	14.07	<p>Section 14.07 states, "Organize the tabled information documented using section 0611-05 to align with the inspection scopes. If no findings or violations were identified state "No findings were identified."</p> <p>Section 0611-05 includes four tables, three of which involve findings. However, Table 3 provides the structure for documenting traditional enforcement violations, with no findings. The statement should be "No findings or violations were identified."</p>	No	<p>In cases where there are no inspection findings, the result section will not exist. Section 14.07 of IMC 0611 has been updated as follows:</p> <p>"Organize the inspection results (e.g. tabled information documented using Sections 0611-05 through 0611-11) in accordance with IMC 0611 Exhibit 1 grouped by IP. Only include tables for IP's which have inspection results. Omit the results section when no inspection results exist in the entire report."</p>
R3-NCP-16	14.07	<p>States, "Organize the tabled information documented using section 0611-05 to align with the inspection scopes. If no findings or violations were identified state "No findings were identified." Next organize the remainder of the tabled information documented using sections 0611-07, 0611-08, and 0611-11 to align with the order of the inspection scopes."</p> <p>The paragraph is confusing as it is not clear whether the inspector is to list every scope section and place "No findings or violations were identified" under each one where this statement is applicable or just for the scope sections where issues were identified. Clarifying statements are needed.</p> <p>In addition, in the Palisades streamline report, Section 71124.02 contains only an Unresolved Item. The statement, "No findings or violations were identified," needs to be added.</p>	Yes	<p>See response to R3-NCP-15</p> <p>Palisades report updated.</p>

Source	Section #	Comment	Added	Remarks
R3-NCP-17	14.07	<p>States, "Organize the tabled information documented using section 0611-05 to align with the inspection scopes. If no findings or violations were identified state "No findings were identified." Next organize the remainder of the tabled information documented using sections 0611-07, 0611-08, and 0611-11 to align with the order of the inspection scopes."</p> <p>In Section 71152 of the Palisades streamlined report, the items are not listed in the order described above, nor are they listed in the order of importance. This needs to be fixed to show inspectors the proper presentation of issues.</p>	Yes	While this comment was not directly applicable to IMC 0611, changes have been made to the palisades inspection report.

Source	Section #	Comment	Added	Remarks
R3-NCP-18	Not Specified	<p>It is not clear if we have considered unintended consequences of separating the scopes from the result section. For example, documenting issues immediately following the scopes (as we do now), enables a reader to clearly see the connection between what was inspected and what was found. With the proposed, the reader will read the list of scopes and not be aware of any issues until reaching the Results section. Separating the scope from the results is not a resource saving action.</p> <p>And lastly, in the Palisades streamlined report, two observations are documented and it is not clear whether the observations are related to the semi-annual trend review or annual sample review.</p>	<p>N/A</p> <p>Yes</p>	<p>The decision to separate the scope and results section was made in a deliberate fashion with discussion through senior management. This also included feedback from the regions and industry. Considering the various stakeholders it is important to list the scope to quickly convey information whether the reader needs to move forward for more detailed information.</p> <p>Yes, your commented provided the need for clarification. The separation of the results section from the scope section removes some of the context and thereby requires some replication of section titles and some added write-up to identify the sample type (e.g., semi-annual trend review or annual sample review).</p> <p>Revised Sections 0611-05 through 0611-11 to ensure this added context is clearly captured within each inspection result.</p>

Source	Section #	Comment	Added	Remarks
R3-NCP-19	14.09 and 14.10	Draft IMC 0611, Exhibit 1 and Draft Revision 1 Section 14.09 and 14.10 all state the list of documents reviewed appear before the acknowledgement of third party reviews. The Template documents the third party reviews prior to the list of documents reviewed. I believe IMC 0611 needs to be revised.	Yes	Sections 14.09 & 14.10 have been swapped. IMC 0611 & IMC 0611 Exhibit 1 were updated accordingly.