

NRC INSPECTION MANUAL

IRGB

INSPECTION MANUAL CHAPTER 0306

**PLANNING, TRACKING, AND REPORTING OF THE
REACTOR OVERSIGHT PROCESS (ROP)**

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0306-01 PURPOSE

01.01 Establishes the basic guidelines for the use and control of the Reactor Program System – Inspections module (RPS-Inspections) and other NRC information systems used to support implementation of the Reactor Oversight Process (ROP).

01.02 Specifies the responsibilities and authorities for the use of the RPS-Inspections module and other NRC information systems used to support the ROP.

01.03 Provides guidance to headquarters and regional staff on charging time spent performing ROP activities.

0306-02 OBJECTIVES

02.01 To ensure consistency in the format and content of ROP-related data entered into RPS-Inspections and other NRC information systems.

02.02 To ensure that ROP-related data entered into RPS-Inspections and other NRC information systems are complete, accurate, and timely to support plant and ROP self-assessment activities.

02.03 To ensure proper control and access to RPS-Inspections and other NRC information systems by program office and regional office users.

02.04 To ensure consistent time charging for ROP activities.

0306-03 DEFINITIONS

The terms used in this manual chapter are consistent with the definitions provided in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," and IMC 0611, "Power Reactor Inspection Reports."

03.01 Agencywide Documents Access and Management System (ADAMS). The official recordkeeping system, through which the NRC provides access to vast "libraries" or collections of documents related to the agency's regulatory activities.

03.02 Configuration Control Board (CCB). A committee that makes decisions regarding whether or not proposed changes to RPS-Inspections should be implemented. The CCB uses a structured process to evaluate and resolve proposed changes. The CCB is made up of end-user stakeholders or their representatives.

03.03 Cost Activity Code (CAC). A CAC is a code used to charge time for all billable (fee and non-fee) activities.

03.04 Direct Inspection Effort (DIE). Time spent conducting inspection activities through the use of an inspection procedure (IP).

03.05 Enterprise Project Identifier (EPID). A data element in the Master Data Management (MDM) System that allows activities and costs to be grouped for both licensing actions and

inspection reports. For inspection reports, the EPID mimics the traditional inspection report numbering scheme used in RPS-Inspections

03.06 Event Date. The Event Date has the same definition as Start Date of Findings in the Assessment Program, as described in IMC 0305. The Event Date for Licensee Event Reports (LERs) and Security Event Reports (SERs) is the actual Event Date (not the issue date) listed in the LER and SER.

03.07 Inspection Planning Cycle (IPC). The annual cycle for planning of baseline inspections. The minimum number of samples defined for each baseline inspection activity is required to be completed in each IPC. Biennial and triennial cycles consist of two and three IPCs respectively.

03.08 Non-Direct Inspection Effort. Time spent supporting inspection activities (i.e., preparation, documentation, travel, SDP, etc.).

03.09 Plant Issues Matrix (PIM). A consolidated listing of individual plant issues (i.e., inspection findings) related to plant performance as identified in issued inspection reports.

03.10 RPS- Inspections. A web-based application that provides an integrated methodology for managing, planning, scheduling, reporting, and analyzing inspection functions and activities performed by the NRC regions and headquarters.

03.11 Sent Date. The date in which an inspection report was signed. It's the same as the Issue Date.

0306-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Division of Inspection and Regional Support (DIRS).

- a. Ensure that RPS-Inspections implementation is consistent with related NRC policies, programs, and guidance, and other NRC information systems.
- b. Resolve RPS-Inspections implementation problems, prioritize system issues and enhancements through the CCB, as well as update and issue implementation guidance.
- c. Verify the accuracy and timeliness of the data maintained in RPS-Inspections and on the ROP webpage in accordance with established schedules.
- d. Control access to RPS-Inspections by program office users.
- e. Ensure the timely and accurate recording of time for all program office activities to support the ROP.
- f. Ensure the timely and accurate transfer of inspection reports, assessment letters, and inspection plans from ADAMS to the Web server to support the posting of this information to the ROP webpage.
- g. Ensure procedure hours and sample sizes are updated in RPS-Inspections when changes occur.

- h. Work with all inspection programs to ensure inspection procedures (IPs) are connected to the correct inspection manual chapter (and appendix where applicable) under the IP Management tab.

04.02 Regional and Headquarter Offices.

- a. Ensure the timely and accurate entry of RPS-Inspections data for all applicable inspection activities including, but not limited to: inspection plans, samples completed, enforcement actions, inspection findings, LERs, and inspection report ML numbers from ADAMS.
- b. Ensure effective management (initial entry, updates, and closeout) of open items tracked in RPS-Inspections in accordance with regional policies, procedures, and practices.
- c. Control access to RPS-Inspections.
- e. Ensure the timely and accurate recording of time for all regional activities to support the ROP.
- f. Ensure the timely and accurate entry of inspection reports, assessment letters, and inspection plans in ADAMS to support the posting of this information to the ROP webpage.
- g. Verify the accuracy and timeliness of the data maintained in RPS-Inspections and on the ROP webpage.

0306-05 GENERAL INSTRUCTIONS AND REQUIREMENTS

Detailed step-by-step guidance on how to use the various features and functions of the RPS-Inspections can be found in the Desk-Top Guide located in the application. Requests for deviations from the guidance below should be submitted to the Division of Inspection and Regional Support/Reactor Inspection Branch (DIRS/IRIB) Branch Chief for review and approval. Requests can be made via email or memorandum.

05.01 Inspection Planning.

- a. All inspection activities should be scheduled and entered into RPS-Inspections.
- b. Sites designated as a Unique Site Budget Model (USBM) should plan to complete additional inspection samples based on documented approvals obtained from DIRS in accordance with IMC 2515. Minimum sample completion is the same as single and multi-unit sites without a USMB designation.
- c. All Quarterly Integrated Inspection activities, conducted by the resident inspectors, should be marked as on-site only. They should not be marked as announced.
- d. All non-resident inspector inspections should be marked as announced and on-site in order to appear in RPS-Inspections/RRPS-Reports/ "Inspection Activity Planned Report," and to designate portions of inspections that are on-site in the RPS-Inspections scheduling tool.

- e. Planned Outages and INPO dates should be maintained and kept up-to-date in RPS-Inspections to help ensure necessary inspections are performed when required and to avoid burden on the licensee when INPO and NRC would be on site at the same time.
- f. Ensure the appropriate activity type and IP is selected when scheduling an inspection. For example, when scheduling a security baseline inspection, use the 71130 series of IPs (designated as SG) and the appropriate activity types for travel (SGT), prep and doc (SPD) in a security baseline inspection.
- g. IMC 2515 Appendix C inspection activities should be coded as “OTHER- Other Activities,” unless they are associated with security inspections (use Major Activity Code “S-Security,” supplemental inspections (use Major Activity Code “SUP-Supplemental’), or reactive inspections (use Major Activity Code “REACT-Reactive”).
- h. Initial Operator Licensing Exams should be scheduled in the RPS-Inspections. The number of applicants and the author for each exam should be entered under the activity code for “Initial License Exam Administration (EXAD),” to assist in the planning for this activity.
- i. Operator Licensing Examiner reactor technology qualifications can be entered under the RPS-Inspections/Admin tab.

05.02 Inspection Procedure Status and Sample Sizes.

- a. The number of completed samples for each IP should be entered into RPS-Inspections as soon as practical after completion of the inspection, but no later than 14 days after the inspection report is issued. This includes certifying (“locking”) the report which prevents changes to the number of completed samples entered for a respective inspection report. Certifying the report also prevents changes to findings and other entries.
- b. The number of LINCVs documented in each report will be counted and certified as a 994OA7 sample.
- c. Upon completion of a Temporary Instruction, a sample size of 1 should be entered into RPS-Inspections.
- d. If a sample size needs to be changed after the report has been certified (“locked”) only those designated as an RPS-Inspections Administrator can de-certify the report for corrections to be made. Each office should have at least one person designated as a RPS-Inspections Administrator.
- e. To preserve the integrity of reports generated after the end of the year, changes should not be made to the completion status of any IP after 90 days following the end of an inspection cycle – or March 31st of the following year. Requests for changes should be made to the DIRS/IRIB Branch Chief.
- f. The completion status of IPs should be updated as soon as practical after completion, but no later than February 15 of each calendar year to support ROP completion certification.

1. The specific IP completion status codes that are used are defined as follows:
 - (a) Incomplete. All required samples in the IP have not met the requirements as discussed in IMC 2515.
 - (b) Not Applicable (N/A). This indicates that completion of a biennial or triennial IP was not performed in a given IPC because it is scheduled to be completed in a future IPC within the same biennial or triennial cycle. This status is not to be used for IPs that are not required or completed in a given IPC for other reasons.
 - (c) Complete. When the number of inspection activities (samples) within the range of sample values specified in each IP have been completed, thus meeting the objectives of the IP. See IMC 2515 for additional details.
 - (d) Complete - by Reference. A specific comment must accompany this selection explaining the reason. (See RPS-Inspections Desktop Guide for instructions on entering comments.) Two ways for this status to be valid are:
 - (1) All requirements of the IP are met by work done in some other IP(s) or at related units on the same site. The comment must reference the other inspection(s) as the basis for demonstrating that all IP requirements are completed (See IMC 2515 for additional information). For planning and reporting purposes, the IP is considered completed.
 - (2) For IPs that have the sample size determined by the performance of the plant over previous years, the minimum sample may vary to less or more than the required sample. Since RPS-Inspections can only assign one sample size for the same IP, plants with a required sample size less than the assigned sample size would use this code.
 - (e) Complete – minimum sample not available iaw IMC 0306. The minimum sample size was not available due to an insufficient number of samples with appropriate risk significance being available for inspection. A specific comment must accompany this selection explaining the reason.
 - (f) Complete – opportunity to apply full procedure not available iaw IMC 0306. The minimum sample size was not available due to an insufficient number of samples because licensee did not conduct the activity covered by the IP. A specific comment must accompany this selection explaining the reason.
 - (g) Complete – in previous year(s). Only biennial and triennial IPs for which all samples have been inspected in the previous year(s) within the same biennial or triennial period can have this status.

2. All baseline IPs that have a quarterly or semi-annual frequency should have a completion status of “Incomplete” until:
 - (a) the cumulative minimum sample size for all inspection frequencies in the year has been reached for the procedure, or
 - (b) It is declared complete per one of the completion status codes.

3. All baseline IPs that have an annual frequency should have a completion status of “Incomplete” until:
 - (a) the cumulative minimum sample size has been reached for the IP, or
 - (b) it is declared complete per one of the completion status codes.

4. For all baseline IPs that have a biennial or triennial frequency:
 - (a) The status of these IPs is “N/A” if they are not required to be completed during the current inspection cycle and will be completed in a future year within the biennial or triennial cycle.
 - (b) The status is “Complete – in previous years” if the IP was completed a previous year within the triennial or biennial period.
 - (c) The completion status should be “Incomplete” if the IP is required to be completed during the current calendar year, until:
 - (1) The required minimum sample size is reached for the IPs, or
 - (2) It is declared “Complete” per a completion status code.

5. The following examples illustrate how to determine the completion status and sample size.
 - (a) Example 1. A baseline IP (such as IP 71111.12) with a quarterly frequency requires reviewing two samples quarterly, for a total of eight samples annually. In the first quarter, the inspectors reviewed only one sample. The branch chief (or designee) entered a completed sample size of “1” and did not change the completion status.

 During the second quarter, the inspectors reviewed two samples, per the IP, and one additional sample that was missed in the first quarter inspection. The branch chief (or designee) entered the completed sample size of “3” and did not change the completion status.

 When the cumulative completed sample size was reached, the branch chief (or designee) should change the completion status to “Complete.”
 - (b) Example 2. The resident inspectors performed a baseline IP that required reviewing seven samples. Only five samples were available during the inspection cycle, based on the risk significance of the available samples.

At the end of the inspection cycle, or when it was determined that additional samples will not be available during the inspection cycle, the branch chief (or designee) should enter "Complete - minimum sample not available in accordance with IMC 0306" as the status with a sample size of "5." A comment should also be added explaining the reason that the minimum sample size was not available for inspection.

- (c) Example 3. A baseline IP that is to be completed "as conditions require" was not performed during the annual inspection cycle. Since there were no opportunities to perform the inspection by the end of the annual cycle.

The branch chief (or designee) should enter "Complete - opportunity to apply full procedure not available in accordance with IMC 0306" as the status with a sample size of "0." A comment should be added explaining the reason the opportunity to apply the IP was not available. (An example of this is IP 71114.04. If the licensee did not make any changes to the e-plan during the inspection cycle, this would be the appropriate completion status code to use.)

- (d) Example 4. A triennial inspection was completed in the second year of the triennial period.

The branch chief (or designee) should enter a completion status of "N/A" for the first year, "Complete" for the second year, and "Complete – in previous years" for the third year.

- (e) Example 5 A Temporary Instructions (TI), was completed at a site.

The branch chief (or designee) should assign an inspection sample of "1" and enter a completion status "Complete."

05.03 Inspection Report and Item Numbering.

a. Inspection Report Numbering.

1. Every inspection report, preliminary or final significance determination letter, traditional enforcement (TE) letter, Notice of Violation (NOV) letter, annual assessment letter, mid-year planning letter, or assessment follow-up letter should be assigned a unique report number through the RPS-Inspections.
2. The numbering format for an inspection report is:

0#000###/YYYY***

Where

0#000### is the docket number, YYYY is the year, and *** is the sequential report or letter number.

- (a) The year in the report number should correspond to the calendar year in

which the first on-site direct inspection activities or the administration of the operator licensing exam.

- (b) Listed below is the numbering convention used for most reports prior to 2018. Starting in calendar year 2018 ROP inspections reports and assessment letters were assigned the following numbers:

<u>Reports</u>	<u>2015-2017</u>	<u>Beginning 2018</u>
First Quarter Integrated Report	001	001
Second Quarter Integrated Report	002	002
Third Quarter Integrated Report	003	003
Fourth Quarter Integrated Report	004	004
Mid-Year Planning Letter	005	005
Annual Assessment	006	006
Assessment Follow Up		007-009
Standalone IMC 2515 Inspections (not Integrated)		010-039
2515 App B Supplemental Inspections		040-049
2515 App C Reactive inspections (SIT/AIT/IIT)		050-059
Final determination letters or other documentation of enforcement actions		090-099
Headquarters	2**	2**
Operator Licensing	3**	3**
Security Mid-Year Planning Letter	401	Now included in 005 report
Security Annual Assessment	402	Now included in 006 report
Security Assessment Follow-Up		403-405
IMC 2201 Inspections 2201 App B Supplemental Inspections 2201 App C reactive inspections (SIT/AIT/IIT) Security Final determination letters or other documentation of enforcement actions		410-499
Emergency Preparedness Annual Inspection Report and other related activities documented in the Integrated Report	501	Now included in 006 report
Emergency Preparedness Assessment Follow Up		502
Emergency Preparedness Inspection Reports Emergency Preparedness Supplemental Inspection	502-599	503-549**

**71114 procedures are included in the quarterly integrated inspection reports. The 500 series of reports is used for standalone EP inspections, when needed.

b. Inspection Item Numbering.

1. An item number is required for each item identified in the inspection report, including each of the six type codes: violation (VIO), non-cited violation (NCV), apparent violation (AV), deviations (DEV), finding (FIN), unresolved item (URI),

and traditional enforcement without an associate finding (TE). LINCVs are only entered as samples under IP 994OA7. LINCVs are not to be entered under the findings section and not given a tracking number.

2. For all licensed facilities, the numbering format for an inspection item is:

<type> 0#000###/YYYY***-\$\$

Where

<type> is the finding type code (AV, FIN, NCV, TE, URI, VIO), #### is the docket number, YYYY is the inspection year, *** is the sequential report number, and \$\$ is the item number.

Examples of inspection report item numbers are:

URI 05000346/2012004-01,
 FIN 05000285/2012003-02,
 VIO 05000443/2012301-03.

3. An item number is unique for each distinct inspection finding.
 - (a) The first item identified in the inspection report has "01" as the item number (\$\$), and each subsequent item is numbered in sequential order, regardless of type.
 - (b) The item number is assigned in sequential order at the site level, not at the unit level.
 - (c) If an item applies to multiple units at the same site, the item number will be the same for all applicable units. In this case, the item number will be the next sequential number of highest item number at the site level. The docket number and the associated inspection report number distinguish the unit to which the item applies.

The following examples illustrate proper item numbering for single and dual-unit sites:

Item Numbering for Single-Unit Site				
Item	Docket	Report	Item #	Remarks
1 st VIO	05000346	2012002	01	
1 st URI	05000346	2012002	02	
2 nd VIO	05000346	2012002	03	
1 st FIN	05000346	2012002	04	

Item Numbering for Dual-Unit Site				
1 st URI	05000295	2012002	01	Unit 1
1 st VIO	05000304	2012002	02	Unit 2
1 st FIN	05000295	2012002	03	both units
	05000304	2012002	03	
2 nd FIN	05000295	2012002	04	Unit 1
2 nd URI	05000295	2012002	05	both units
	05000304	2012002	05	

d. Enforcement Action (EA) Numbering

1. An EA number must be assigned for enforcement actions (e.g., escalated, discretion, confirmatory action letters, licensee denials, T.E. enforcement, chilling effect letter, etc.) as specified in the Enforcement Manual.
 - (a) Contact the Regional enforcement coordinator for the assignment of an EA number.
 - (b) EA numbers are formatted as EA-YY-NNN (e.g. EA-18-001).
 - (c) The EA number should be entered into “Case/Reference Number” field when profiling the inspection report in ADAMS.

05.04 Charging Time for ROP Activities.

a. General Guidance.

1. Time spent performing activities in support of the ROP are entered into the Human Resource Management System (HRMS) in accordance with guidance promulgated by the Office of the Chief Financial Officer (OCFO), NRR, and the regions.
2. EPIDs and CAC /staff assignments for inspection related activities should both be requested through RPS-Inspections by anyone with a RPS-Inspections User role. Designated approvers (typically branch chiefs) should only approve EPIDs and staff assignments associated with inspections and operator licensing through RPS-Inspections.
 - (a) When a report number is created, an EPID will also be created. Every inspection tied to that report will display the EPID number.
 - (b) EPID numbers are made up of four parts. The first section of the EPID is always the letter “I” to indicate that the EPID is for an inspection or “L” for licensing (Operator Exams). The second section is the year in which the first on-site direct inspection effort or the administration of the operator licensing exam will occur. The third section of the EPID number is the last three digits of the report number that the EPID was created for. The fourth

section is a unique number that is auto-generated. An example might be I-2017-002-0001 for a second quarter 2017 inspection report.

- (c) Once an EPID is approved in the RPS-Inspections, the request will be sent to the Enterprise Data Management System (EDMS) indicating that an EPID has been requested and approved. RPS-Inspections will retrieve an EPID from EDMS. Once an EPID is approved and retrieved from EDMS, the EPID number will be displayed on all scheduled items. The approver may have to go back into RPS-Inspections to approve staff to use the assigned EPIDs.
- (d) After a staff member is added to an inspection, the staff member is now eligible to be assigned to “Activities” and “Procedures.” All “Activities” and “Procedures” are tied to CACs. The CAC assignment process in RPS-Inspections is essentially the adding of staff to “Activities” or “Procedures” in a scheduled item.

b. Inspection Activities.

- 1. Assignment of CACs for direct and indirect inspection effort should be performed in RPS-Inspections (including operator licensing exams). Assignment and approval of other CACs should be done through the CAC system.
- 2. Approved CACs for use are maintained in the RPS-Inspections under the IP Management Tab. DIRS is responsible for assigning the approved CAC to its corresponding IP and activity.

c. Assessment Activities (including Security and Emergency Preparedness).

- 1. The assessment report number that is created for each plant is based on the year for which performance is being assessed (i.e., The Annual Assessment letter for plant performance for CY 2015 would be assigned 05000###2015006).
- 2. All assessment related activities should be charged to CACs associated with the “ASM,” “ESM,” and “SSM”. Baseline (ASM), emergency preparedness (ESM), and security (SSM) related activities associated with the mid-year planning letter and annual assessment letter should be assigned to report numbers ending in 005 and 006, respectively.
- 3. All time spent associated with end-of-cycle assessment activities should be charged to the report number that corresponds to the year being assessed. For example: all time spent preparing for and conducting end-of-cycle assessment activities/meetings for inspections conducted in calendar year 2017 should be charged to 2017006, irrespective of when performed. This does not apply to the public annual assessment meetings. Time spent preparing for and conducting these meetings should be charged to the quarterly resident report in which the activities occurred.

d. Processing Follow-On Activities after Issuing a Report.

1. Denials, appeals, and other licensee responses to findings and violations are addressed by re-opening and un-certifying the existing closed report which identified the issue and addressing the resolution of the finding or violation. If this review does not change the results or conclusion of the original report, certify and close the report after issuing a letter to the licensee describing the resolution. If this review changes the results or conclusion of the original report, then see IMC 0611 for guidance on how to reissue a revised/amended report, which may be called an ERRATA. In addition, update the appropriate RPS entries, certify and close the report.
2. AV follow-up is addressed by opening a new inspection report for enforcement conferences, follow-up SDP work, SERPs, etc., and the final determination letter must be issued under that new report number.

05.05 Inspection Report Closeout

Upon issuance of the report, the sent date (date report signed/approved) and its associated ML number should be entered into the RPS-Inspections/Inspection Reports tab within 14 days after issuance of the report.

05.06 Entering and Updating Inspection Findings in RPS-Inspections and Plant Issues Matrix (PIM).

- a. The PIM report provides a consolidated listing of individual plant findings (except LINCVs and URIs) that the NRC uses to assess plant performance. Accurately entered findings are the vital link between inspection reports and information posting to the ROP webpage.
- b. The PIM text will be the "Introduction" and "Performance Assessment" sections in the inspection report finding write-up. If the PIM entry is excessively long, the inspector should consider editing the assessment section of the PIM entry to reflect the important parts of the assessment.
- c. The PIM should be updated as soon as practical, but no later than 14 days after the issuance of the report.
- d. Required entries and updates in RPS-Inspections.
 1. All entries in the inspection reports, and all issues given an item number, are captured in the PIM, with the exception of URIs. (LINCVs are not included in the PIM.) For the issue to show in the PIM report, the "PIM" checkbox needs to be checked. Refer to IMC 0612, Appendix B, "Issue Screening," for issues required to be documented.
 2. A new finding entry should be created if a URI becomes an AV, FIN, VIO, or NCV and the URI closed.
 3. AVs that are later determined to be FINs or VIOs should be updated in RPS, using the Significance Update or Final Determination options, based on the

inspection report that documents the change in status. AVs should not be closed and reopened as a FIN or VIO, nor should the Event Date be changed.

4. When a report or letter follows up on an existing item (i.e., final SDP letters and supplemental inspection reports), the existing item must be updated to reflect the new information. This is to ensure traceability of an issue from discovery to final resolution.

e. Special Cases.

1. Security-Related Inspection Items.

- (a) Non-Safeguards Findings/Violations should be entered into RPS-Inspections. Each entry should contain the following designation on top and at the end of the description: "***OUO-Security Related Information**"
- (b) Safeguards findings/violations should be tracked in RPS-Inspections. No Safeguards information should ever be entered into RPS-Inspections. Entries should consist of the following to allow for adequate tracking / trending:
Title: Safeguards Finding (SLES: #XXXXX)
Description: Safeguard Finding (SLES #XXXX)

2. Unresolved Items (URIs).

- (a) If an item remains unresolved upon issuance of an inspection report, it is designated as a "URI."
- (b) URIs are documented in the body of an inspection report and assigned a tracking number.
- (c) URI's are entered into RPS-Inspections under the applicable cornerstone, with a type code of "URI," and a significance determination of "N/A" (not applicable). However, do not check the PIM box.
- (d) URIs are closed in RPS-Inspections based on the inspection report that documents the resolution. It is possible to open a URI in one report and close it in another under the IP and area in which the URI was opened. A sample should not be credited when closing a URI, add the sample in RPS-Inspections (mark as a partial so it is not counted as a sample), and charge the hours in HRMS to the appropriate CAC for the IP used to follow-up on the URI.

3. Significance To Be Determined.

- (a) The final risk significance of a finding is determined during the significance determination process (SDP).
- (b) Potentially or preliminary greater-than-green findings, as well as pending significance and/or escalated enforcement shall be entered into RPS-Inspections under the applicable cornerstone, with a "Type" code of "AV"

or "FIN," and with a significance determination of "TBD" (to be determined).

- (c) Once the final characterization is determined and the final significance determination letter has been issued, the item description and significance determination is updated in RPS-Inspections to reflect the latest information. The "Type" code can be "FIN," "VIO," or "NCV." Do not change the "Event Date."
4. Cross Cutting Aspects. Select the appropriate CCA from the drop-down menu under "Details" for findings that are assigned a CCA iaw IMC 0310.
5. Parallel PI Inspection Findings.
- (a) Refer to IMC 0305 regarding this type of finding.
 - (b) When entering these findings in RPS-Inspections, input enough detail to note the associated PI and that these findings are parallel PI inspection findings.
 - (c) Any new issues identified during the supplemental inspection beyond the scope of the original issue(s) are entered into RPS-Inspections as separate entries and are assigned the appropriate significance via the SDP.
6. Supplemental Inspection Results for Inspection Findings.
- (a) A summary of supplemental inspection results should be added to the original inspection finding item in RPS-Inspections using either the "Discuss" or "Close Item" options.
 - (b) The finding should be closed if the Supplemental Inspection was completed satisfactorily in accordance with IMC 0305.
 - (c) Additional inspection findings identified during the supplemental inspection beyond the scope of the original finding(s) are entered in RPS-Inspections as new entries and are assigned the appropriate significance via the SDP.
7. Independent Items.
- (a) The following items should be tracked in RPS-Inspections: Confirmatory Action Letters (CAL), Licensee Event Reports (LER), License Renewal Commitment, Non-Conformance Order, Security Event Report (SER), and Written Event Report. Information related to safeguards events should contain no greater detail than its associated initial Event Notification Report. Do not enter Sensitive Unclassified Non-Safeguards Information (SUNSI)-related information.
 - (b) After LERs and SERs are entered in RPS-Inspections as independent items, they must be associated with any inspection report that discusses

and/or closes the LER and SER. This enables the proper tracking of LER and SER documentation to occur after they are closed.

8. Findings Held Open Greater Than 4 Quarters. Findings that are being held open greater than 4 quarters shall remain open in RPS-Inspections until the date in which the inspection report closing the finding is issued.
9. Findings With Violations Receiving Enforcement Discretion. Refer to IMC 0305 for guidance on findings qualified for this condition. For those findings, entries will be made in RPS-Inspections, with an explanation of the discretion, so they can be assessed properly in accordance with IMC 0305. The “PIM” checkbox needs to be checked.
10. Notice of Enforcement Discretion (NOED). When a Notice of Enforcement Discretion (NOED) is granted, no violations/findings will be entered in RPS. Any findings/violations associated with follow up inspections on NOED will follow guidance in IMC 0611. Refer to IMC 0410 for use of URIs with NOED.
11. Withdrawing a violation
 - (a) Re-open and de-certify the report.
 - (b) Delete the finding entry and re-number the remaining items
 - (c) Enter the re-issued report’s ML number in the “Accession Number” field in the Inspection Reports tab. Maintain the original report ML number in the “Reference Number” field. See 05.04d for additional details.
 - (d) Re-certify and close the report.

05.07 Finding Description and Inspection Finding Display on NRC Webpage

a. Sample Finding Description.

Below is a sample web display for a typical greater-than-green finding that has been processed through the SDP and the supplemental inspection has been completed.

Initial Entry: In this example, the initial preliminary finding was entered into the PIM in a few days after the inspection report was issued (IR# 05000xxx/2003012 dated September 8, 2003). The text was taken from the finding’s write-up (“Introduction” and “Performance Assessment” sections). The type was entered as “AV” and the significance was entered as “TBD.” The “Event Date” was entered corresponding to the end of the last day of onsite inspection activities in which the item was identified as an “AV” (July 28, 2003).

First Update: The original finding description was updated shortly after the final SDP letter was issued (IR# 05000xxx/2003015 dated December 7, 2003). The additional text summarizing the final significance determination was added to the original PIM entry. The type was changed from “AV” to “VIO” and the significance was changed from “TBD” to “WHITE.” The “Event Date” was not changed.

Second Update: The original finding description was updated shortly after the supplemental inspection report was issued (IR# 05000xxx/2004004 dated March 14, 2004). The additional text summarizing the supplemental inspection results was added to the original PIM entry. Again, the "Event Date" was not changed.

This example demonstrates the process necessary to ensure that the finding descriptions on the web provide traceability of an issue from discovery to final resolution. The updates to the ROP webpage will occur in accordance with the schedule described in section 05.08, or as soon as possible, if there is a known change in licensee performance and resultant NRC actions. In order to update the web in a timely manner, regional staff must notify NRR's ROP Assessment Branch (IRAB) staff any time they reach a final determination or obtain clarifying information affecting a plant and its placement in the ROP Action Matrix Summary (AMS). The finding will appear on the Plant Inspection Findings webpage for four quarters from the original finding date unless specific actions are taken to hold the finding open in accordance with IMC 0305.

<p>Significance: WHITE Date: July 28, 2003</p> <p>Identified By: NRC</p> <p>Item Type: VIO Violation</p> <p>Failure to Prepare a Shipment of Radioactive Waste to Satisfy External Package Radiation Level Limits</p> <p>(Initial Entry)</p> <p>An apparent violation was identified for the failure to prepare a package of radioactive material for shipment so that the radiation level does not exceed 200 millirem/hour at any point on the external surface of the package. Package surface radiation levels in excess of 200 millirem/hour were identified by a waste processing contractor upon receipt of the shipment from the licensee.</p> <p>The finding was more than minor because it was associated with the "Program and Process" attribute of the Public Radiation Safety Cornerstone, and affected the cornerstone objective of ensuring adequate protection of public health and safety from exposure to radioactive materials. (IR# 05000xxx/2003012 dated September 8, 2003)</p> <p>(First Update)</p> <p>The finding was determined to be of low to moderate safety significance (White) because the transportation problem involved an external package radiation level that exceeded limits by 25 percent and because the area of elevated radiation on the package was determined to be accessible to a member of the public during conditions normally incident to transportation. (IR# 05000xxx/2003015 dated December 7, 2003)</p> <p>(Second Update)</p> <p>The NRC performed a supplemental inspection to assess the adequacy of the licensee's evaluation, extent of condition/cause review and associated corrective actions. The inspector determined that the licensee performed an adequate evaluation of the specific performance issue and that comprehensive corrective actions were completed to address each of the specific causes. (IR# 05000xxx/2004004 dated March 14, 2004)</p> <p>Inspection Report#: 2003012(pdf) [hyperlink to original IR] Inspection Report#: 2003015(pdf) [hyperlink to final SDP letter] Inspection Report#: 2004004(pdf) [hyperlink to supplemental IR]</p>
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b. Inspection Finding Display on NRC Webpage.

1. The ROP webpage displays the summary of inspection findings that appear in the PIM.
2. The ROP webpage includes all issues designated as “VIO,” “FIN,” “AV,” and NRC identified and self-revealing “NCV.”
3. Findings and PIs in the Security cornerstone will not be made public. However, any historical data entered before the third quarter 2004 will still remain available on the webpage. NRC employees may gain access to the current Security PIs and inspection findings through ROP Digital City (NRC non-public webpage).

05.08 ROP Web Posting Process, Content and Schedule.

a. Web Posting.

1. The tables below provide the types of inspection reports that are posted and due dates for data submissions and updates to the ROP webpages. When a due date falls upon a weekend or federal holiday, the due date is the next federal working day.

Insp Rpt Type	Description	Term	Displayed on the Public Website
A	Assessment Report	90 days	Yes
D	Final Determination Report	90 days	Yes
F	Assessment Followup Report	90 days	Yes
I	Integrated	45 days	Yes
M	Materials Special	30 days	No
O	Operator Licensing	45 days	No
R	Materials Routine	30 days	Yes
T	Team or 45 Days Report	45 days	Yes
U	Supplemental Inspection	45 days	Yes
V	Reactive Inspection (SIT)	45 days	Yes
W	Reactive Inspection (AIT, IIT)	30 days	Yes

Information	Due date (Days following the end of the calendar quarter unless noted otherwise)
Changes to AMS (along with findings, inspection reports, and assessment letters) posted to external webpage (outside of quarterly input)	14 days after information is publicly available
Licensees submit Performance Indicators	21 days
HQ archives previous quarter data in historical performance webpages	21 days
IRAB posts updated Performance Indicators to internal webpage for review	24 days (or 3 business days after licensee submittal date)
Regions send AMS email message to ROPAssessment.Resource@nrc.gov	30 days
IRAB posts Performance Indicators to internal and external webpages	35 days
Regions send assessment follow-up letters to licensees (if applicable) and email them to ROPAssessment.Resource@nrc.gov	49 days
IRAB reposts information to the internal and external ROP webpages to capture updated PIM and IR.	50 days
IRAB updates assessment letter webpage and Action Matrix Summary (AMS), if applicable.	51 days (AMS quarters 1 and 3)
Regions send mid-year planning letters or annual assessment letters to licensees and email them to ROPAssessment.Resource@nrc.gov	63 days
IRAB updates assessment letter, AMS, and Cross-Cutting Issue (CCI) summary webpages at the end of mid-year and annual assessment periods	65 days (AMS quarters 2 and 4)
Final Determination Report (open a new report for the follow-up activities and SDP after issuing an AV)	90 days from initial report (See IMC 0307 App A (metric E-5)) 120 days from exit (See Enforcement Manual sections 2.4.5 and 2.6.5)
Corrections or change in SDP of any findings (greater-than-green)	As needed
IRAB posts any available PIM entries, and inspection reports, to internal and external webpages	Monthly

2. The ROP webpage will be updated in the first week of the month with the latest available PIM entries (from the RPS- Inspections module), inspection reports (from ADAMS), and related inspection findings.

3. When there is a change in Action Matrix column designation, the RPS-Inspections entries and related inspection reports are posted as soon as practical after the reports become publicly available. These updates include the final significance determination that resulted in a risk significance that is greater-than-green or a final enforcement decision that resulted in a notice of violation being issued.
 4. The ROP webpages will also be updated on an as-needed basis to correct any discrepancies, omissions in previously posted information, or if there is a change in licensee performance (generally for greater-than-green findings) and resultant NRC actions.
- b. Performance Indicators.
1. Licensees submit quarterly PI data, in accordance with NEI 99-02, "Regulatory Assessment Performance Indicator Guideline".
 2. PI data, indicator values, and associated graphs are posted to the NRC's internal ROP webpage in accordance with the table in Section 05.08a.1. The regions then review the PIs and determine the Action Matrix designations, as well as identify any errors prior to public release.
 3. The NRC posts the PIs, along with the latest inspection findings and Action Matrix designations, to the agency's internal and external ROP webpages in accordance with the table in Section 05.08a.1.
 4. Licensees are expected to submit changes to PI data as soon as practical, but no later than the end of the quarter in which an error is discovered.
- c. Inspection Reports.
1. The regions and NSIR are responsible for entering:
 - (a) Inspection reports into ADAMS in accordance with the ADAMS template;
 - (b) Public inspection report ADAMS accession number into the RPS-Inspections/ Inspection Reports tab, in the "Accession Number" field or Non-Public inspection report ADAMS accession number (such as a security report) in the "Accession Number" field and check the "Non-Public" box (Note: if a publicly available cover letter is created, enter that ADAMS Accession No. into the "Accession Number" field, and the non-public Accession No. into the "Referenced ML" field, and do not check the "Non-Public" box)); and
 - (c) Inspection findings into RPS-Inspections in accordance with this manual chapter.
 2. In order to support posting these documents to the ROP webpage, inspection reports must be:
 - (a) Processed and declared in ADAMS as publicly available;

- (b) The release date in ADAMS is at least a day before the date of posting;
 - (c) Placed in the applicable site subfolder within the “Power Reactor Correspondence” folder of ADAMS;
 - (d) Both the Inspection Report “Sent Date,” and the “Inspection Completion Date,” or Exit date, must be entered in the RPS-Inspections/Inspection Reports tab; and
 - (e) For integrated reports:
 - (1) The Inspection “Completion Date” must be on the last day of the quarter the inspection is in, and
 - (2) The Inspection “Close Date” must be before the sweep date.
3. For security inspection reports, only after a SUNSI review and for security inspection reports with no violations or findings, the security report cover letter and 'clean' security report will be posted to the external webpage. For the stand alone cover letter, the regions will issue a new cover letter with a distinct ADAMS accession number; this number is then placed in the “Accession No. (ML):” field in the RPS-Inspections/Inspection Reports tab. The non-public security report ML number is placed in the “Referenced ML No.:" field.
- d. Assessment Letters and Inspection Plans.
1. Mid-year planning and annual assessment letters with inspection plans are issued for all plants after the completion of the second and fourth calendar quarters, in accordance with IMC 0305. These letters are placed on the public webpage in accordance with the table in Section 05.08a.1.

Assessment follow-up letters are typically issued after the completion of the first and third calendar quarters only for those plants that crossed performance thresholds, in accordance with IMC 0305.
 2. Assessment follow-up letters typically do not include updated inspection plans, however, they may note any inspection plan changes associated with forthcoming supplemental inspections. These letters are placed on the public webpage after they are dated and sent to licensees in accordance with the table in Section 05.08a.1.
 3. Assessment follow-up letters can also be issued on an as-needed basis between the quarterly reviews. These letters are placed on the public webpage after they are dated and sent to licensees in accordance with the table in Section 05.08a.1.
 4. The regions are responsible for entering:
 - (a) Assessment letters and inspection plans into ADAMS in accordance with the ADAMS template, and
 - (b) ADAMS accession number into the RPS-Inspections/ Inspection Reports

tab for assessment letters and inspection plans.

5. To support posting these documents to the NRC's public "Operating Reactors/Reactor Oversight Process" webpage in a timely manner, assessment letters and inspection planning letters must be properly entered and declared in ADAMS and should be placed in the appropriate site subfolder within the "Power Reactor Correspondence" folder of ADAMS.
 6. The regional offices need to ensure that ROPAssessment.Resource@nrc.gov is on distribution for all assessment letters and inspection plans. IRAB staff will transfer the letters to the Q:\ drive and work with NRRWebServices.Resource@nrc.gov to place them on the public webpage.
- e. Cross-Cutting Issues (CCIs). CCIs are identified during the mid-year and annual assessment performance review and documented in accordance with IMC 0305. IRAB will update the NRC public "ROP Cross-Cutting Issues Summary" webpage after an assessment letter documenting opening or closure of a CCI is issued."
- f. Assessment-Related Webpages.
1. Action Matrix Webpage.
 - (a) IRAB updates the NRC's public "ROP Action Matrix Summary and Current Regulatory Oversight" webpage as needed in accordance with the table in Section 05.08a.1.
 - (b) To support timely changes to this webpage, the regional offices shall place ROPAssessment.Resource@nrc.gov on distribution for the following correspondence:
 - (1) Supplemental inspection reports; and
 - (2) Final SDP letters.
 2. Action Matrix Deviations Webpage.
 - (a) After a licensee has been notified of an Action Matrix deviation, IRAB will update the NRC's public "ROP Action Matrix Deviations" webpage to notify the public of the deviation and the basis for the deviation.
 - (b) The regional office shall place ROPAssessment.Resource@nrc.gov on distribution of the assessment follow-up letter describing the deviation.

The email should also contain a description of the deviation as it should appear on the public webpage. IRAB may modify the text as necessary before posting it to the public webpage. The description should include:

 - (1) Affected reactor units;
 - (2) Date the EDO approved the deviation;

- (3) Description of the deviation;
- (4) Description of when the deviation is expected to be closed; and
- (5) Description of changes to ROP guidance, if applicable.

END

0306-06 REFERENCES

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

IMC 0305, "Operating Reactor Assessment Program"

IMC 0307, Appendix B, "ROP Baseline Inspection Procedure Reviews"

IMC 0310, "Aspects Within Cross-Cutting Areas"

IMC 0611, "Power Reactor Inspection Reports"

IMC 0612, "Issue Screening"

IMC 2201, "Security Inspection Program for Commercial Nuclear Power Reactors"

IMC 2515, "Light Water Reactor Inspection Program"

5 USC 552a, "Records Maintained on Individuals"

10 CFR Part 9, "Public Records"

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline"

Attachment 1 – Revision History for IMC 0306

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	6/24/03 CN 03-021	Initial Issue		
	ML053220168 11/15/05 CN 05-029	Revised to: 1) incorporate recommendations from a recent OIG audit of the Reactor Program System, 2) clarify the uses and definitions of several terms to ensure consistent application, 3) clarify the process for initiating and updating inspection finding information in RPS, and 4) remove several of the detailed attachments and tables to relocate them to the internal ROP Web page for easier revision and maintenance.		
	ML070240189 04/04/07 CN 07-012	Revised to inform the Program Offices and the Regions of updated guidance and procedures for RPS and the ROP webpage. Researched commitments back four years - none found.		ML070790675
	ML083290114 12/04/08 CN 08-034	Revised to include guidance on Confirmatory Orders, clarifying the use of URI's, and Security items being entered into the PIM. In addition to incorporate feedback from stakeholders.		ML083290136
	ML111430179 11/17/11 CN 11-036	Rewrite for organization. Revised to make the format consistent with IMC 0040; to improve readability; to incorporate changes resulted from FBF (1579, 1516, 1488 and 1388); to correct outdated guidance; and to be consistent with IMC 0612 and 0305.		

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML12089A070 06/13/12 CN 12-009	Revised for Security Cornerstone Reintegration		ML12153A281
	ML14065A228 07/18/14 CN 14-016	Revised to include comments from FBF 0306-1739, which asks for clarification in LER section 05.05.g.7.(2) regarding tracking LERs in RPS, with the exception of telephone notifications and FBF 0306-1897, which discusses aligning IMC 0612 Exhibit 2 with IMC 0306, as well as make editorial changes, based on FBF 0306-1879 to ensure ease of use for new users to RPS, and FBF 0306-2000 which requests a match in the timeline for action matrix information, for both IMC 0305 and IMC 0306.		ML14181A494 0306-1739 ML13261A196 0306-1879 ML14181A388 0306-1897 ML13182A222 0306-2000 ML14181A469
	ML15341A089 12/23/15 CN 15-032	Revised editorially to change the manual chapter title to be more descriptive, change substantive cross cutting issue (SCCI) to cross cutting issues (CCI) per feedback form 0306-2138. Added information regarding inspection item numbering in Section 05.03.b.2 to say that LINCVs will not be numbered as an item in an inspection report. Added text for counting LINCVs specifically as "BI" for Congress with a placeholder baseline procedure, and changed security and emergency preparedness assessment letters to inspection planning transmittal letters.		0306-2138 ML15267A489 0306-2161 ML15267A541

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML18071A040 05/10/18 CN 18-012	Major revision to align with new RPS-Inspections application, as well as the splitting of MC 0611, "Power Reactor Inspection Reports," and IMC 0612, "Issue Screening"		ML18071A046 0305-2226 0306-2202 ML18072A131 0306-2238 ML18072A139