

NRC INSPECTION MANUAL

IRIB

INSPECTION PROCEDURE 93812

SPECIAL INSPECTION TEAM

Effective Date: 04/02/2019

PROGRAM APPLICABILITY: IMC 2201 C, IMC 2515 C, IMC 2600 B, IMC 2800

93812-01 INSPECTION OBJECTIVE

The inspection objective is to promptly disseminate the facts, conditions, circumstances, and causes of significant events and to identify appropriate followup actions.

For reactors sites, a special inspection team (SIT) is the event assessment response assigned by the NRC in accordance with Inspection Manual Chapter (IMC) 0309, "Reactive Inspection Decision Basis for Reactors." The inspection is conducted based on this procedure and an inspection charter.

93812-02 INSPECTION REQUIREMENTS

Note: Management Directive (MD) 8.3, "NRC Incident Investigation Program," defines the authorities, responsibilities, and basic requirements for personnel investigating significant operational power reactor events. These events may include significant unplanned degraded conditions identified by the licensee or NRC. MD 8.3 also characterizes the differences between an Augmented Inspection Team (AIT), Incident Investigation Team (IIT), and SIT.

02.01 SIT Leader

- a. Acts as the supervisor of the SI.
- b. Reviews charter and support its development as needed.
- c. Forwards information on potentially generic safety questions (such as questions or concerns related to the design or licensing bases) to the Regional Operating Experience Coordinators, Nuclear Reactor Regulation (NRR) Division of Inspection and Regional Support (DIRS) Operating Experience Branch (IOEB), or both when warranted.
- d. Conducts an entrance meeting with the licensee to discuss the purpose and scope of the SIT response, and to:
 1. Obtain the licensee's understanding of the event (including operator actions and the performance of safety systems).

2. Request licensee assistance in scheduling interviews, obtaining information related to the event, and, if needed, assisting in inspection activities related to the event.
 3. Discusses the quarantined equipment list, if applicable, and the procedure for changing it.
- e. During the initial debrief:
1. Provides a recommendation to the Regional Administrator (RA) as to whether the SI should continue or be upgraded to an AIT response *when sufficient information become available*.
 2. *When* a Preliminary Notification (PN) is required, *provides input to office and technical staff so they can prepare* and transmit a PN report to the RA for distribution. IMC 1120, "Preliminary Notifications," has criteria for issuing a written PN.
- g. As applicable, *provides input to office and technical staff to prepare* supplemental PN reports and/or *daily notes* when there is significant new information to report to keep management informed of significant facts, findings, and progress of the inspection.
- h. Manages the SIT effort in fact-finding and analysis to meet the objectives of the SIT charter. Important information will include the details of what occurred during the event and the causes and contributing factors to the event.
- i. Conducts an exit meeting with the licensee to:
1. Summarize the SIT inspection effort.
 2. As appropriate, discuss preliminary findings, *violations*, observations, or issues resulting from the SIT.
- j. Prepares report for the RA documenting the SIT results. May direct the SIT members to remain together, either at the inspection site or at the Regional Office, to facilitate the preparation of the SIT report.
- 02.02 SIT Members
- a. Report directly to the SIT leader.
 - b. Conduct a timely, thorough and systematic inspection of significant operational events at facilities licensed by the NRC, under the supervision of the SIT leader. In so doing, members shall:
 1. Assess the significance of the event under the guidance of the SIT leader.
 2. Collect, analyze and document factual information and evidence as directed by the SIT leader.

3. Evaluate the adequacy of licensee response to an event under the guidance of the SIT leader.
 4. Evaluate and document inspection findings **and violations**. Due to the reactive nature of special inspections, SIT members shall assure the issuance of the special inspection report is not delayed to **assess the significance or severity of findings or violations**. In some cases, it may be appropriate to document a pending finding, apparent violation, or unresolved item for inspector follow-up.
- c. Remain together after the inspection, at the discretion of the SIT leader, for the purpose of preparing the SIT report.

93812-03 INSPECTION GUIDANCE

03.01 **Scope of SIT Response**. The following guidance should not be construed as limiting SIT authority to pursue all pertinent aspects of an event. However, safety (or regulatory) concerns raised that may or may not be directly related to the event under consideration should be reported to Headquarters and/or Regional Office management for appropriate action.

- a. **Promptly identify and convey** potential generic safety concerns to the regional management **and NRR/DIRS/IOEB when appropriate**, who will initiate **appropriate** follow-up actions. Recommendations for immediate follow-up actions, such as issuance of Information Notices, Generic Letters, or Bulletins, shall also be made through the normal organizational structure and procedures.
- b. Emphasize fact finding, i.e., fully understanding the circumstances surrounding an event and probable cause(s), including conditions preceding the event, chronology, systems response, equipment performance, precursors, human factors considerations, quality assurance considerations, radiological considerations, safeguards considerations, and *safety culture component considerations* (as defined in IMC 0310, "Components Within The Cross-Cutting Areas"). [C1] Determine whether the licensee had failed to adequately implement generic communications, such as Information Notices, Generic Letters, and Bulletins.
- c. Base the fact-finding effort on the most timely, reliable evidential material, including interviews and other documented material related to the event previously obtained by internal audit or investigative groups. **Inspectors should consider visiting vendors' or contractors' facilities, if necessary, to gather additional insights and/or to verify licensee conclusions that are dependent on vendor/contractor supplied information.** The inspectors should consult with the Quality and Vendor Branch for additional guidance prior to visiting a vendor and/or contractor.
- d. It is not the responsibility of an SIT to:
 1. Examine the regulatory process **during the inspection** (to determine whether that process contributed directly to the cause or course of the event). **When the regulatory process appears to have contributed directly to the cause or course of the event, the SIT should provide feedback to the program office. The inspection program feedback process is describe in IMC 0801, "Inspection Program Feedback Process."**

2. Address licensee actions related to plant restart.
3. Address the applicability of potential generic safety or security concerns to other facilities.

03.02 Documentation. Refer to IMC 0611 Attachment 2, "Guidance for Reactive Inspection Reports."

03.03 SIT Leader Communications. When the chronology and circumstances of the event are more clearly understood, the SIT leader is encouraged to maintain communications with cognizant personnel from the Regional Office, NRR, NMSS, or NSIR as appropriate to:

- a. provide a first-hand update of the event
- b. respond to any questions
- c. discuss the appropriateness of the SIT response

03.04 Inspection Team. The SIT leader should be a senior inspector or engineer. Group expertise is based upon the nature of the event, as well as the uncertainty of influential assumptions affecting the risk significance of the event. Technical experts from the responsible regional office are comparable for SITs and AITs, but SITs (unlike AITs) are usually not augmented by personnel from Headquarters, other regions, or contractors with special technical qualifications.

93812-04 RESOURCE ESTIMATES

The resources required to complete this inspection are highly variable and dependent on the circumstances involved. Therefore, no specific resources estimates are provided.

93812-05 PROCEDURE COMPLETION

This procedure is considered complete when the inspection and charter objectives have been met and the final inspection report has been issued.

93812-06 REFERENCES

MD 8.3, "NRC Incident Investigation Procedures"

NUREG 1303, "Incident Investigation Manual"

IMC 0310, "Components Within The Cross-Cutting Areas"

IMC 0309, "Reactive Inspection Decision Basis for Reactors"

IMC 0609, "Significance Determination Process"

IMC 0611 Attachment 2, "Guidance for Reactive Inspection Reports"

IMC 0801, "Inspection Program Feedback Process"

IMC 2523, "NRC Application of the Reactor Operating Experience Program in NRC Oversight Processes"

IP 93800, "Augmented Inspection Team"

END

Attachment 1
Revision History for IP 93812

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)
N/A	04/03/00 CN 00-003	IP 93812 is modified to be performed as a supplemental procedure (Appendix B).	N/A	N/A
N/A	03/06/01 CN 01-006	IP 93812 has been revised to provide consistency with Management Directive 8.3, and to provide guidance on Preliminary Notifications.	N/A	N/A
N/A	<u>ML023020559</u> 10/23/02 CN 02-039	IP 93812 has been revised to provide guidance on documenting information relating to events that is in addition to that currently required by IMC 0612, "Power Reactor Inspection Reports," such as description/chronology, risk-significance, and probable contributing causes.	N/A	N/A
N/A	<u>ML031990467</u> 07/07/03 CN 03-023	IP 93812 has been revised to reflect the revision to Management Directive 8.3, "NRC Incident Investigation Program," and to delete the prohibition for Special Inspections to review licensee actions related to plant restart.	N/A	N/A
C1	<u>ML061560514</u> 06/22/06 CN 06-015	Incorporate safety culture into inspection procedures. "Staff Requirements - SECY-04-0111 - Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture" August 30, 2004. Revision history reviewed for the last four years.	Yes, no description available. Completed 07/01/06	<u>ML061570136</u>

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)
N/A	ML071920283 07/18/07 CN 07-022	IP 93812 is revised to consider licensee implementation of Information Notices, Generic Letters, and Bulletins.	N/A	N/A
N/A	ML073390043 01/10/08 CN 08-002	Guidance on feedback form recommendations for improving the SI process based on lessons learned from SIs.	N/A	N/A
N/A	ML081230527 07/25/08 CN 08-020	Guidance for recommending improvements to reactor oversight process baseline inspection procedures based on lessons learned from the SI.	N/A	N/A
N/A	ML083370411 03/23/09 CN 09-010	Evaluate whether the event and its causes indicate gaps in ROP baseline inspection procedures.	N/A	ML090400970
N/A	ML11294A427 11/15/11 CN 11-033	Added guidance related to interviewing vendor or contractor personnel (FF 93012-1465)	N/A	N/A
N/A	ML17306B161 11/15/17 CN 17-025	Amended 02.01.b and 03.02.b text to clarify details of charter. Closed FF 93800-1839. Added clarification that the issuance of the report should not be delayed for SDP processes.	N/A	93800-1839 ML17319A912
	ML18275A423 04/02/19 CN 19-012	Relocated documentation guidance into the new IMC 0611 Attachment 2, "Guidance for Document Reactive Inspections." Addressed numerous minor issues identified in FBF 93812-1772.		ML18331A290 93812-1772 ML18303A202 ML18303A203