# **INSPECTION PROCEDURE 93800**

# AUGMENTED INSPECTION TEAM

Effective Date: 04/02/2019

PROGRAM APPLICABILITY: IMC 2201 C, IMC 2515 C, IMC 2600 B, IMC 2690 B, IMC 2800

93800-01 INSPECTION OBJECTIVE

See Directive and Handbook 8.3, "NRC Incident Investigation Program" section III.A for inspection objectives.

For reactors sites, an Augment Inspection Team (AIT) 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.

### 93800-02 INSPECTION REQUIREMENTS

Note: Management Directive (MD) 8.3, "NRC Incident Investigation Program," defines the authorities, responsibilities, and basic requirements for personnel investigating significant operational events. MD 8.3 also characterizes the differences between an AIT, Incident Investigation Team (IIT), and a Special Inspection Team (SIT).

### 02.01 AIT Leader

- a. Acts as the supervisor of the AIT.
- 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 AIT response, and to:
  - 1. Obtain the licensee's understanding of the event (including operator actions and the performance of safety systems).
  - Request licensee assistance in scheduling interviews, obtaining information related to the event, and, if needed, assisting in inspection activities related to the event.
  - 3. Discuss the quarantined equipment list, as appropriate, and the procedure for changing it.

- e. During the initial debrief:
  - 1. Provides a recommendation to the Regional Administrator (RA) as to whether the AIT inspection should continue, be upgraded to an IIT response, or be downgraded to a SIT 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.
- f. 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.
- g. Manages the AIT effort in fact-finding and analysis to meet the objectives of the AIT charter. Important information will include the details of what occurred during the event and the causes and contributing factors to the event.
- h. Conducts an exit meeting with the licensee to:
  - 1. Summarize the AIT inspection effort.
  - 2. As appropriate, discuss preliminary findings, observations, or issues resulting from the AIT.
- i. Prepares a report for signature by the RA documenting the findings of the AIT. May direct the AIT members to remain together, either at the inspection site or at the Regional Office, to facilitate the preparation of the AIT report.
- j. Meets with regional management to discuss the AIT recommendation(s) for staff followup based on the findings of the AIT report, and assists in coordinating the transfer of responsibility for followup actions.

# 02.02 AIT Members

- a. Report directly to the AIT leader.
- b. Conduct a timely, thorough and systematic inspection of significant operational events at facilities licensed by the NRC, under the supervision of the AIT leader. In so doing, team members shall:
  - 1. Assess the significance of the event under the guidance of the AIT leader.
  - Collect, analyze and document factual information and evidence as directed by the AIT leader.
  - 3. Evaluate the adequacy of licensee response to an event under the guidance of the AIT leader.
- c. Remain together after the inspection, at the discretion of the AIT leader, for the purpose of preparing the AIT report.

#### 93800-03 INSPECTION GUIDANCE

03.01 <u>Scope of AIT Response</u>. The following guidance should not be construed as limiting AIT 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 generic safety concerns to the regional management and NRR/DIRS/IOEB when appropriate, who will initiate 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, event chronology, systems response, equipment performance, event 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 past operating experience including 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 AIT to:
  - Examine the regulatory process (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 AIT should submit feedback to the program office. The inspection program feedback process is describe in IMC 0801, "Inspection Program Feedback Process."
  - 2. Determine whether NRC rules or requirements were violated, recommend enforcement actions. However, inspectors may evaluate and document inspection findings provided that this does not interfere with fulfillment of the team's charter or delay the issuance of the inspection report.
  - 3. Evaluate risk significance of findings, using Significance Determination Process. It may be appropriate to document a pending finding, apparent violation, or unresolved item for inspector follow-up so as not to delay the inspection report.
  - 4. Address licensee actions related to plant restart.
  - 5. Address the applicability of generic safety or security concerns at other facilities.

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

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03.03 <u>AIT Leader Communications</u>. When the chronology and circumstances of the event are more clearly understood, the AIT 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 AIT response

03.04 <u>Inspection Team</u>. The AIT Leader is either a non-Senior Executive Service manager or a qualified team leader. Team expertise is based upon the nature of the event, as well as the uncertainty of influential assumptions affecting risk significance of the event. AITs are augmented by personnel from Headquarters, other regions, or contractors with technical qualifications.

### 93800-04 RESOURCES ESTIMATES

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

### 93800-05 PROCEDURE COMPLETION

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

93800-06 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 93812, "Special Inspection Team"

**END** 

# Attachment 1 Revision History for IP 93800

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	01/14/88 CN 88-001	Initial issuance. Revision history reviewed for the last four years.	N/A	N/A
N/A	07/05/89 CN 89-012	Revision	N/A	N/A
N/A	12/11/98 CN 98-019	Revised to include lessons learned from an inspection at WNP-2 regarding the assignment of team members to the AIT, in addition to minor editorial changes.	None	N/A
N/A	08/02/99 CN 99-012	Revised to include the requirement to provide an executive summary in plain English in the inspection report generated by this procedure. This revision was made in response to SECY-99-070, "Implementation Plan for the Public Communications Initiative (DSI-14)."	None	N/A
N/A	04/03/00 CN 00-003	Modified to be performed as a supplemental procedure (Appendix B).	None	N/A
N/A	ML023020552 10/23/02 CN 02-039	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.	None	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
C1	ML061560511 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	Inspector training on use of safety culture in the ROP.	ML061570132
N/A	ML071920281 07/18/07 CN 07-022	Revised to consider licensee implementation of Information Notices, Generic Letters, and Bulletins.	None	N/A
N/A	ML073390041 02/12/08 CN 08-007	Guidance on resources for follow up to AITs	None	ML080250272
N/A	ML081230523 07/25/08 CN 08-020	Guidance for recommending improvements to reactor oversight process baseline inspection procedures based on lessons learned from the AIT.	None	N/A
N/A	ML083370396 03/23/09 CN 09-010	Evaluate whether event and its causes indicate gaps in ROP baseline inspection procedures.	None	ML090400970
N/A	ML17269A044 11/15/17 CN 17-025	Amended 02.01.b and 03.02.b. text to clarify details regarding charter. Closed FF 93800-1839	None	93800-1839 <u>ML17319A912</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	ML18276A286 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.	None	ML18331A289 93812-1772 ML18303A202 ML18303A203