

NRC INSPECTION MANUAL

IRSB

INSPECTION MANUAL CHAPTER 0306

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

Table of Contents

0306-01	PURPOSE.....	1
0306-02	OBJECTIVES.....	1
0306-03	APPLICABILITY	1
0306-04	DEFINITIONS	1
0306-05	RESPONSIBILITIES AND AUTHORITIES	3
05.01	Division of Reactor Oversight (DRO).....	3
05.02	Regional and Headquarter Offices.	3
0306-06	GENERAL INSTRUCTIONS AND REQUIREMENTS.....	4
06.01	Inspection Planning	4
06.02	Generating Inspection Report Numbers and EPIDs.....	6
06.03	Associating Inspection-related Activities and Charging Time	8
06.04	Entering Completed Inspection Samples	10
06.05	Entering Inspection Results	11
06.06	Generating/Finalizing Inspection Reports	15
06.07	Modifying Issued Inspection Report (Errata or Appeals)	16
06.08	Sample Completion Status	17
06.09	Other Data Entered into RPS-Inspections	18
06.10	Other Assessment Letters and Inspection Schedule Plans.....	19
06.11	ROP Web Posting Process, Content and Schedule.....	20
06.12	Inspection Program and Auto Report Generator Management	23
06.13	Administration of RPS-Inspections	23
06.14	Tools for Scheduling and Performance Monitoring	24
06.15	Communicating System Problems/Potential Enhancements	24
0306-07	REFERENCES.....	24
Attachment 1	– Inspection Report Numbering	Att1-1
Attachment 2	– Inspection Item Numbering.....	Att2-1
Attachment 3	-- Inspection Completion Status Illustrative Examples	Att3-1
Attachment 3	– Revision History for IMC 0306.....	Att4-1

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 Nuclear Regulatory Commission (NRC) information systems (such as the Cost Activity Code system (CACs)), used to support implementation of the Reactor Oversight Process (ROP). This inspection manual chapter focuses on the RPS-Inspections system.

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 and use of RPS-Inspections for ROP activities.

0306-03 APPLICABILITY

This Inspection Manual Chapter (IMC) applies primarily to staff who use RPS-Inspections to plan, schedule, and report on operating reactor inspection information. The information provided in this IMC can also be used by those using RPS-Inspections for the planning and scheduling of non-operating reactor inspection activities, such as decommissioning, independent spent fuel storage, fuel cycle, etc.

0306-04 DEFINITIONS

The terms used in this manual chapter are consistent with the definitions provided in IMC 0305, "Operating Reactor Assessment Program," IMC 0611, "Power Reactor Inspection Reports," IMC 2201, "Security Inspection Program for Commercial Nuclear Power Reactors," and IMC 2515, "Light Water Reactor Inspection Program."

04.01 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.

04.02 Cost Activity Codes (CACs). A unique, six-character alphanumeric or numeric code that is aligned to the agency's budget structure business line, product line and product (BL/PL/P). CACs represent fee and non-fee billable activities for mission direct and mission indirect, corporate direct, corporate indirect, and administrative work performed by NRC and contractor staff. In RPS-Inspections a CAC is associated with each inspection procedure and activity that is linked with a docket and an EPID, creating a combination assignment string for inspectors. CACs associated with work performed for inspections are assigned to employees by their supervisor, through RPS-Inspections as a CAC, docket and EPID combination.

04.03 Configuration Control Board (CCB). A board that makes decisions regarding whether proposed changes to RPS-Inspections should be implemented. The CCB uses a structured process, defined by the Office of the Chief Information Officer (OCIO), to evaluate, prioritize and propose changes to the RPS Executive CCB, which is made up of and chaired by stakeholder management. (See non-public ADAMS document ML19269C125)

04.04 Direct Inspection Effort (DIE). Time spent conducting inspection activities using an inspection procedure (IP).

04.05 Enterprise Project Identifier (EPID). A standard alphanumeric code representing a project or inspection. The CAC system allows activities and costs to be grouped for project-based activities, such as licensing actions and inspection reports. The EPID mimics the traditional inspection report numbering scheme, including the year that onsite work begins.

04.06 Indirect Inspection Activities. Activities that support the core mission-direct activities. This includes supervisory, non-supervisory support, and administrative assistance time. It also includes time spent developing and delivering mission training programs.

04.07 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.

04.08 Non-Direct Inspection Effort. Time spent supporting direct inspection effort (DIE). Examples include preparation, documentation, travel, significance determination process, etc.

04.09 Plant Issues Matrix (PIM). A consolidated listing of individual plant issues (i.e., inspection findings/violations) except for licensee identified violations (LINCVs), unresolved items (URI), observations, assessments, etc. Consists of the introduction section of each finding/violation and other key information such as cornerstone, identification credit, significance determination, and cross cutting aspect. Information can be found in the non-public RPS-Inspections report IR3, "PIM." The PIM is the source for information that is posted to the public webpage concerning NRC findings/violations.

04.10 RPS-Inspections. A web-based application that provides an integrated methodology for managing, planning, scheduling, reporting, generating inspection reports, and analyzing inspection functions and activities performed by the NRC regions and headquarters. Sometimes referred to as the Inspection Scheduling, Tracking, and Reporting (ISTAR) system.

0306-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Division of Reactor Oversight (DRO).

- a. Ensure that RPS-Inspections implementation is consistent with related NRC policies, programs, guidance, and other NRC information systems.
- b. Work with all inspection programs to ensure inspection procedures (IPs) are connected to the correct IMC (and appendix where applicable) under the RPS-Inspections/IP Management tab.
- c. Ensure procedure hours, sample sizes, auto report generator templates, and scope texts are updated in the RPS-Inspections/IP Management tab when changes occur.
- d. Coordinate with OCIO and the Office of the Chief Financial Officer (OCFO) to ensure accuracy of databases integrated with RPS-Inspections. This includes ensuring plant information, such as phase codes, are updated as plants transition from construction to operational, or operational to decommissioning, and ensuring all activities and procedures in RPS-Inspections have a valid CAC.
- e. Resolve RPS-Inspections implementation problems, prioritize system issues and enhancements through the RPS-Inspections and Executive RPS CCBs, as well as update and issue implementation guidance.
- f. Ensure the timely and accurate transfer of inspection reports, assessment letters, and inspection schedule plans from ADAMS to the web server 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 in accordance with established schedules.
- h. Control access to RPS-Inspections by program office users.
- i. Maintain RPS-Inspections tools and guides up-to-date as changes to the program are implemented and provide training, as needed.

05.02 Regional and Headquarter Offices.

- a. Ensure the timely and accurate entry of RPS-Inspections related information and data for all applicable inspection activities including, but not limited to: inspection schedule plans, staff assignments, samples completed, inspection results, and inspection report status.
- 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. Ensure individual staff level access in RPS-Inspections is appropriate for the assigned office. Includes maintaining Operator Licensing Examiner reactor technology qualifications up-to-date under the RPS-Inspections/Admin tab.

- d. Verify staff is assigned to the appropriate site, report and inspection-related activities to facilitate accurate time reporting in the Human Resources Management System (HRMS).
- e. Ensure the timely and accurate entry of inspection reports, assessment letters, and inspection schedule plans into ADAMS to support the posting of this information to the Reactor Oversight Process (ROP) webpage. Verify the accuracy and timeliness of the data maintained in RPS-Inspections and on the ROP webpage.
- f. Supports continued improvements in RPS-Inspections by reporting concerns and identifying improvements/efficiencies in processes. Maintain representatives on the RPS-Inspections CCB.

0306-06 GENERAL INSTRUCTIONS AND REQUIREMENTS

Detailed step-by-step guidance on how to use the various features and functions of the RPS-Inspections module can be found in the non-public RPS-Inspections Desktop Guide located within the application. Requests for deviations from the guidance below shall be submitted to the DRO/Support and Oversight Branch (DRO/IRSB) Branch Chief for review and approval. Requests can be made via email or memorandum.

It is anticipated that all inspection reports will be generated in RPS-Inspections using the auto report generator functionality. In rare cases, when RPS-Inspections cannot support auto report generation, an inspection report can be created outside of RPS-Inspections. When this occurs, ensure all samples and inspection results documented in the issued report are accurately reflected in RPS-Inspections, and approved. To accomplish this, some portion of each result needs to be entered into RPS-Inspections and approved. To generate the proper tracking numbers for each result, the associated report shall be placed in a final status prior to report issuance. These tracking numbers shall be used for each of the documented results in the inspection report to ensure accuracy of data between the application and the issued report.

Every effort should be made to ensure the information within RPS-Inspections (scope, samples, and results) are maintained as close as possible to what is contained in the issued inspection report that is placed on ADAMS.

Time spent performing activities in support of the ROP are entered into HRMS in accordance with guidance provided by OCFO, the Office of Nuclear Reactor Regulation (NRR), and the regions.

06.01 Inspection Planning – Creating Inspection-Related Activities

- a. All inspection activities conducted under IMC 2201 and IMC 2515 shall be scheduled and entered in RPS-Inspections.
- b. Staff shall ensure the appropriate major activity code, activity type, and inspection procedure is selected when scheduling an inspection. A list of major activity codes and activity types can be found in ADAMS (ML19142A328). For example:
 - When scheduling IMC 2515 Appendix C inspection activities, staff should choose “OTHER-Other Activities,” as the major activity code, unless the inspection is associated with EP (use “EP”) or Security (use “S”).

- When scheduling a security baseline inspection, staff should use the 71130 series of IPs (designated as SG) and the activity types associated with security (for travel (SGT), prep and doc (SPD)) need to be used. This guidance also applies to EP inspections where the 71114 (with exception of 71114.06) as designated as EP. Use the activity types associated with EP: EPT, EPP etc.).
- c. All quarterly integrated inspection activities and procedures that are conducted by the resident inspectors, shall be marked as on-site only and are not marked as announced.
 - d. All non-resident inspection procedures that are expected to appear in RPS-Inspections Reports/IP 22, "Inspection Activity Planned Report," shall be marked as announced and on-site.
 - e. To ensure accuracy of the RPS-Inspections scheduling tool, and accurate reporting of time in HRMS, staff should ensure the dates entered in RPS-Inspections accurately reflect their expected date range. Avoid using large date ranges whenever possible. For example, a regional inspector assigned to assist in an inspection typically performed by a resident inspector should enter a specific date range for their activity and avoid defaulting to the entire quarter.
 - f. Planned Outages and INPO dates shall be maintained and kept up-to-date in RPS-Inspections to help ensure inspections are performed when required and to avoid burden on the licensee to the best extent possible when INPO and NRC could be on-site at the same time. Details concerning outages and INPO activities are not made public and information should be treated with appropriate sensitivity.
 - g. Sites designated as a Unique Site Budget Model (USBM) should plan to complete additional inspection samples based on documented approvals obtained from DRO in accordance with IMC 2515. Minimum sample completion is the same as single and multi-unit sites without a USBM designation.
 - h. Initial Operator Licensing Examinations/and Retake Examinations shall be scheduled in RPS-Inspections. The number of applicants and the author for each examination shall be entered under the activity code for "Initial License Exam Administration (EXAD)," to assist in the planning for this activity. See non-public ADAMS document ML19142A328 for a list of activity codes to be used for scheduling initial and retake examinations.
 - i. When scheduling Independent Spent Fuel Storage Installation (ISFSI) inspections, create separate entries and reports (Part 50 and 72) for each docket to RPS-Inspections to ensure the appropriate inspection activities, procedures, and reports are available. This also ensures the appropriate CACs are available for inspectors to charge their time appropriately for ISFSI inspections.
 - j. Lead inspectors shall ensure the contracting officer's representative (COR) is assigned to the inspection activity and inspection procedure for inspections involving the use of contractors. The COR will not charge time to the inspection but must be listed in the inspection for payment requests that are made to U.S. Treasury for those inspections.
 - k. Distinct activities are required for actions related to non-Green findings or non-SL IV violations and shall be created under "Schedule New Item." These distinct activities will

be associated to separate, individual letters and reports. These include updating a:

- To be determined (TBD) finding to a finding with a preliminary color;
- TBD apparent violation (AV) to an AV with a preliminary color;
- TBD AV or AV with a preliminary color to a final color.
- TBD significance to a final severity level (for Traditional Enforcement)

- I. Inspection procedures used to resolve any URIs should be marked as on-site regardless of where the follow-up inspection occurred. This action will add the inspector’s name to the list of inspectors.

06.02 Generating Inspection Report Numbers and EPIDs

- a. Inspection report numbers are generated through RPS-Inspections, based on the report type selected, and can be done by anyone with an RPS-Inspections user role. See Attachment 1 for details on the numbering convention used for inspection reports.

If an incorrect report type is selected, the report will need to be cancelled in RPS-Inspections/Inspection Report tab. This will ensure the report number will be available for future use. If this error is caught after hours have been charged to the report/EPID with the incorrect report type, the time charge will need to be corrected in HRMS once a new inspection report is requested with the correct report type. At this point the incorrect EPID can be cancelled.

The creation and association of inspection reports to scheduled items should be accomplished in accordance with established regional practices, to the best extent possible. When creating a new report, staff shall utilize the following guidance for entering the required information:

EPID/Report Title	Should be clear enough to inform the user of the overall inspection conducted and a designation of the site in which it occurred. The following format is preferred: Inspection Type – Site Abbreviation. Examples: Fire Protection – LM Security Baseline Inspection – ANO Quarterly Integrated Inspection - NMP
Office	Select from drop down
EPID Contact	Typically, the senior resident inspector for quarterly integrated inspection report, and the team lead for standalone reports. NOTE: the EPID Contact cannot be the same as the EPID Contact Supervisor, per directions provided by OCFO
EPID Contact Supervisor (In RPS-Inspections it is the EPID Supervisor)	Typically, the Branch Chief responsible for the inspection and issuing the associated inspection report.
Docket	Application defaults to all units associated for the site selected and should be adjusted to include only the specific dockets for the given inspection report.
Report Type	Select from drop down.

Inspection Type	Select from drop down.
Organization Region	Select from drop down.
Responsible Organization	Select from drop down. Should be the EPID Contact Supervisor's assigned branch
First Date Available in HRMS	Input a date that starts before or on the same day before the first activity that needs to be performed. Typically, about 2-3 months <u>prior</u> to the first onsite inspection date to allow for charging time to prep, travel, etc.
Inspection Completion Date	The last day of the quarter for quarterly integrated reports, or the anticipated date for the exit meeting – typically the last day on-site for standalone reports
Due Date	RPS auto-generated field of 30 or 45 days after the exit meeting, depending on the inspection type.
Report Number Year	Type the 4-digit number of the year in which the first on-site direct inspection effort will occur. For operator licensing examination, this is the year the exam will be administered.

- b. A separate inspection report number will need to be created when a finding/violation is identified as a result in an Office of Investigations (OI) report, and the finding/violation will not be documented in an existing inspection report. Obtaining a separate inspection report number from RPS-Inspections will allow inspectors to document any inspection results identified in the investigation effort.
- c. The process for creating new reports needs to be followed for all reports including those associated with AV follow-up activities. AV follow-up is addressed by opening a new inspection report for enforcement conferences, follow-up SDP work, significance and enforcement review panels (SERPs), etc., and the final determination letter must be issued under that new report number.
- d. For inspections involving ISFSI, two inspection report numbers shall be created – one for the Part 50 inspection and one for the Part 72 inspection.
- e. When a report number is created, an EPID request will also be generated. Once an EPID request is approved in RPS-Inspections by a HRMS approving official, the request will be sent to the CAC system indicating that an EPID has been requested and approved. CACS will send back the EPID number to RPS-Inspections. The EPID number is linked to the created inspection report.

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 (including operator licensing examinations). The second section is the year in which the first on-site direct inspection effort or the administration of the operator licensing examinations will occur. The third section of the EPID number is the last three digits of the inspection report number that the EPID was created for. The fourth section is a unique number that is auto-generated for OCFO purposes. Examples:

EPID I-2019-002-0001 for a second quarter 2019 integrated inspection report or
EPID L-2019-OLL-0018 for an initial operator licensing examination administered in 2019.

- f. Administrative changes to EPIDs (except changing the start date) are made from the RPS-Inspections/Inspection Reports tab. Requests for changes to the EPID start date can be requested through the OCFO ATLPC non-public SharePoint site.

The EPID Contact and the EPID Contact Supervisor information must be kept up-to-date. If staff are no longer assigned to, or involved with, the associated inspection, the information needs to be updated in accordance with the timeliness requirements established in the NRC's "Labor Reporting Policy & Guidance" (non-public ADAMS document ML19106A125).

06.03 Associating Inspection-Related Activities and Time Charging Guidance

- a. Inspector assignments to procedures and activities (such as travel, prep and doc, etc.) in RPS-Inspections, shall require assigning inspectors to the scheduled item and checking the box to the left of their name. This also creates an approval request for the newly assigned activity.
- b. CAC assignments for inspection-related and operator licensing activities shall only be requested through RPS-Inspections unless directed otherwise by OCFO. Approved CACs for use are maintained in the RPS-Inspections system under the IP Management (IPM) Tab. DRO is responsible for assigning the approved CAC to its corresponding IP and activity.
- c. Requests for CAC assignments can be done by anyone with an RPS-Inspections user role. For the CAC to appear in an inspectors HRMS for time charging, it needs to be approved in RPS-Inspections by a Branch Chief/Approving Official or above. *Responsible Branch Chiefs must verify that the appropriate IP and activity type is assigned to the correct inspection and is consistent with the associated Major Activity Codes when approving inspections in RPS-Inspections. A list of Major Activity codes can be found in the non-public ADAMS document ML19142A328. [C1]*
- d. For ISFSI activities, the inspector needs to associate activities to both the Part 50 and Part 72 inspection reports to ensure the appropriate CACs are available to use in their HRMS. The inspectors charge hours to the appropriate docket based on the inspection activity being performed.
- e. For multi-unit single-owner sites, inspection hours can be charged to only one unit if the licensee agrees and the inspection report references all the docket numbers for the site.

Licensees are billed based on the reported data, so time must be reported accurately. The NRC analyzes reported data to assist program refinements and budget formulation (IMC 0307, Appendix B, "ROP Realignment Process"). For inspections performed under just one docket number on multi-unit sites, special inspections, supplemental, license renewal, and refueling outages, etc., hours should only be charged to the specific unit on which the inspection was performed.

- f. For End-of-Cycle (EOC) and Mid-Year planning activities:
 - 1. A report number shall be generated to track, and document activities associated with mid-year planning and end-of-cycle assessment. The report number assigned to

these activities shall be linked to the year for which performance is being assessed. For example, for CY 2019, the mid-year planning letter will be assigned 05000###/2019005 and issued in August 2019 whereas the Annual Assessment letter for plant performance would be assigned 05000###/2019006 and issued in March 2020. The mid-year and annual assessment activities occur primarily in the 2-3 months after the mid- and end of year. The period for the mid-year activities is assigned as approximately July– September for 20xx005 and the end-of-year activities is assigned as approximately December – March for 20xx006.

2. Time shall be charged to the 20XX006 inspection report for the year being assessed. Work associated with the internal assessment meeting, such as preparing for and participating in the meeting, as well as with the development of the inspection schedule and assessment letter, shall all be charged to the 20XX006 report number.

For example, work associated with the 2019 inspection period, including preparing for and participating the internal assessment meeting, and the development of the inspection schedule and assessment letter, shall all be charged to the 2019006 report number irrespective of when the work is performed.

3. All assessment related activities shall be charged to the CACs associated with the appropriate activity codes for baseline (ASM), emergency preparedness (ESM), and security (SSM), and assigned to report 20xx005 (for the mid-year planning letter), and report 20xx006 (for the annual assessment letter).
 4. All activities associated with ongoing or quarterly assessments, including preparing for and conducting EOC public meetings, shall be charged to the associated quarterly integrated report. For example, if the EOC public meeting to discuss 2019 licensee performance is conducted in the third quarter of 2020, then the time spent on these activities should be charged to the third quarter resident integrated report (2020003).
- g. All activities associated with enforcement related orders, including confirmatory orders shall be charged to the specific procedures and activity codes listed in Yellow Announcement (YA) 19-0057, issued June 17, 2019 (non-public ADAMS document ML19135A361).
 - h. Each senior resident inspector (SRI) and resident inspector (RI) shall be assigned (based on facility type) the FRII code (CAC 1500), NRII code (CAC 1491), or ORII code (CAC 001496) to each quarterly integrated inspection to account for time spent performing fee-billable indirect inspection activities as established in the NRC's "Labor Reporting Policy & Guidance," (non-public ADAMS document ML19106A125).

The CAC shall be used by only those assigned as the permanent or temporary/acting resident inspector. The CAC shall not be used by visiting inspectors providing site coverage for a short duration while the SRI or RI is away from the site.

When the SRI or RI are conducting indirect inspection activities while conducting a back-up site visit or participating on an inspection not at their normally assigned site, they should continue to charge their time to the ORII CAC with the docket and EPID combination that is associated with their normally assigned site.

- i. Inspectors shall charge hours to the CAC codes which reflect the work being performed. It may be appropriate to use an activity CAC (such as prep/doc or COM) while on-site if work in these areas is being performed. It may also be appropriate to charge time to direct inspection efforts (inspection procedures) while in the office.

06.04 Entering and Approving Completed Inspection Samples

- a. Where appropriate, the RPS-Inspections auto report generator has been loaded with pre-established content (aka “ghost text”) for each inspection procedure to aid the inspector in documenting the performance of the inspection procedure and the samples completed (typically captured under the Scope sections of a report). This “ghost text” may be modified, as applicable. DRO is responsible for creating and updating the “ghost text” when changes to the inspection procedure requirements are made or new procedures are created (such as with a Temporary Instruction (TI)). See the non-public RPS-Inspections Desktop Guide for instructions regarding how to modify the ghost text.
- b. Inspectors should enter the description of the inspection sample and/or scope into RPS-Inspections as soon as practical after completion of the sample.
- c. Scope information and sample completion for any inspection involving “Official Use Only” may be inputted into RPS-Inspections. However, Safeguards information shall NOT be placed into RPS-Inspections at any time.
- d. A sample should be designated in RPS-Inspections as a “partial sample” when an inspection is started in one inspection period and is planned to be completed in another.

For example, when outages span two inspection periods, the inspector should document the work performed in the first quarterly report as a partial sample, and the remaining work performed as a completed sample in the second quarterly report. See the non-public RPS-Inspections Desktop Guide for how to indicate a sample as partial.

When using the partial sample option, expand the scope documentation to indicate what inspection activities were specifically completed. See IMC 0611 for an example write-up.

- e. Unresolved items (URIs) are closed in RPS-Inspections based on the inspection report that documents the resolution. See the non-public RPS-Inspections Desktop Guide for how to discuss or close a URI. When performing a follow-up inspection for URIs, the inspector should document their work by adding a statement to the appropriate scope section indicating that the URI was reviewed. Use the same procedure which opened the URI to close it, unless it is not a baseline procedure. A sample should not be credited if following up a URI in which a sample was already accounted for (no double counting). See IMC 0611 for details on documenting the scope, sample and results of the review.
- f. The Branch Chief responsible for the inspection related activity performed (feeder or quarterly report) shall review the scope and samples documented by the inspector and move the toggle from “in progress” to “approved” if they find the documentation acceptable. This enables the scope and samples associated with that inspection activity to appear in the report when the report is placed in a “final” status in RPS-Inspections.

06.05 Entering and Approving Inspection Results

- a. Inspectors should enter inspection results into RPS-Inspections during the inspection process. The result should be documented in accordance with IMC 0611 using the “I plan to document,” feature in the auto report generator function.
- b. Findings and/or violations resulting from allegation follow-up or OI effort need to be added to RPS-Inspections under the report created for this effort to ensure proper tracking and accounting.
- c. Inspectors shall fill in all applicable fields associated with the type of result selected. The tracking data for each result must be reviewed and completed prior to the result being approved. The PIM check box shall be checked for all results entered using Tables 1-4 of IMC 0611 (findings, apparent violations, and violations regardless of whether a color or significance has been assigned). To properly track a result, the following dates will need to be entered:

PIM Date	For results in a quarterly integrated report it is the last day of the quarter. For results in a standalone report it is the inspection exit date (typically the last day of onsite inspection).
Projected Closeout	Optional Field to be used for results in an open status.
Closure Date	The date the inspection report is sent/signed (same as Issue Date). This date needs to be entered after the report has been issued. For greater-than-Green (GTG) issues, it’s the date the issue is removed from the Action Matrix.
Issue Date	The date the inspection report is sent/signed (same as Closure Date). This date needs to be entered after the report has been issued.
Event Date	Same as the PIM Date

- d. AVs should not be closed and reopened as FIN or VIO, nor should the Event Date be changed.
- e. Results associated with a Part 72 licensee will be entered under the Part 72 inspection report, which will be manually integrated (using MS Word) with the Part 50 inspection report after the inspection reports are made final in RPS-Inspections.
- f. The Branch Chief responsible for the inspection activity performed shall review any results documented with that inspection activity and move the toggle from “in progress” to “approved” if they find the documentation acceptable. This enables the result associated with that inspection activity to appear in the report when the report is placed in a “final” status in RPS-Inspections.
- g. When discussing or closing all open items (such as LERs, SERs, and URIs) the inspectors shall use the update feature and follow the guidance in the non-public RPS-Inspections Desktop Guide. This ensures these items will be included in the “Additional Issues” list in the summary page of the generated inspection report.

- h. If a URI becomes an apparent violation, finding, violation, or non-cited violation, it should first be closed using the document update feature and then a new finding entry should be made by using "I plan to document," which will assign it a new tracking number.
- i. Issues resulting from Enforcement Guidance Memorandums are candidates for enforcement discretion. For those issues, entries will be made in RPS-Inspections, with an explanation of the discretion, so they can be assessed properly in accordance with IMC 0305.
- j. Severity level IV violations without performance deficiencies do not receive enforcement discretion. These violations are not to be described as findings and are not assigned a color. In accordance with, "Interim Guidance for Dispositioning Severity Level IV Violations With No Associated Performance Deficiency," (non-public ADAMS document ML18158A220) issued by the Office of Enforcement and DRO, SLIV violations without an associated performance deficiency need to be documented in the following manner in RPS-Inspections:
 - For NRC-identified or self-revealed violations, select "Traditional Enforcement Violation," using the, "I plan to document," tool.
 - For licensee-identified violations, select "Licensee Identified NCV" using the, "I plan to document," tool.
- k. An Enforcement Action (EA) number, which can be assigned by the regional enforcement coordinator, must be assigned for enforcement actions (e.g., escalated enforcement, discretion associated with an Enforcement Guidance Memorandum, confirmatory action letters, licensee denials, chilling effect letters, etc.), as specified in the Enforcement Manual. Enter an EA number in the EA number field when documenting a discretion, and the appropriate, "I plan to document," field. The EA number will be included in the cover letter.
- l. The results of initial operator licensing examinations and re-take examinations are transmitted to the licensee via a letter generated outside of RPS-Inspections in accordance with NUREG-1021. If a finding or violation is identified during an initial operator licensing examination or re-take examination, document the issue in the examination report and, if applicable, in the PIM. The results of operator licensing requalification inspections are documented in the applicable quarterly integrated report.
- m. Security-Related Inspections.
 - 1. Security inspections (such as Physical Security, Cyber, and Material Control and Accountability) can be documented within RPS-Inspections if they do not contain any information at the safeguards (or higher) classification.

In some cases, the regions or headquarters may elect not to generate a security related inspection report in RPS-Inspections. In those cases, the samples performed, and results identified, must still be entered in RPS-Inspections to ensure the proper tracking and accounting of the inspection. In addition, established office policies, procedures, and practices should be followed to ensure all samples and results are correctly reflected in RPS-Inspections.

2. *If a report contains safeguards information, it needs to be generated in an approved SGI computer system. In these cases, the samples performed, and results identified must still be entered into RPS-Inspections prior to issuing the report to ensure the proper tracking and accounting of the inspection. However, the information entered must not contain any safeguards information. Limited information associated with the safeguards finding/violation shall be entered into RPS-Inspections. [C2] Specifically, the following information should be filled out in the following manner to allow for adequate tracking and trending*

Title	The following should be entered: “Safeguards Finding (SLES NS#XXX)”
Dockets	Select the correct docket(s)
Procedure	Select the inspection procedure finding/violation associated with,
Cornerstone	Select “Security”
Identification	Select the appropriate identification
Introduction	The following should be entered: “Safeguards Finding (SLES NS#XXX)”
Cross-Cutting Aspect	Select the appropriate cross-cutting aspect assigned in the report.

3. For security inspection reports with Official Use Only (OUO) information, the regions will issue two documents: a cover letter which can be released to the public and a non-public version of the cover letter with the inspection report containing the OUO information attached. Each document will have a distinct ADAMS accession number.
4. Only after a thorough SUNSI review of the inspection report:
- For a report containing no OUO or safeguards information, the publicly available cover letter and report should be issued and posted to the NRC public webpage.
 - For a report containing OUO information, a standalone publicly available cover letter should be created. The ADAMS accession number of this cover letter gets entered in the “Accession No. (ML):” field in the RPS-Inspections/Inspection Reports tab and the non-public security report ML number is entered into the “Referenced ML No. :” field.

n. Supplemental Inspection Results

1. If the inspectors conclude the conditions to close the performance indicator were not met, create a separate, parallel PI inspection finding as applicable in accordance with IMC 0305. When entering this finding in RPS-Inspections, select the appropriate IP 9500x as the procedure being used and input enough detail in the description field to note the associated PI. Remember to document in the introduction and description fields that these findings are parallel PI inspection findings. The color of this finding will be assigned the same color as the PI. Do not select a cross-cutting aspect for this finding.
2. 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.

- o. When a Notice of Enforcement Discretion (NOED) is granted, a URI shall be opened in accordance with the NRC Enforcement Manual, Appendix F, "Notices of Enforcement Discretion," to track the required follow-up activities to determine if there was a performance deficiency or if additional information is required to determine if the NOED issue was more than minor. The follow-up activities shall be conducted in accordance with IP 71153 and documented in accordance with IMC 0611.
- p. Handling Findings/Violations that Do Not Initially Screen to Green
 - 1. As updates are needed to the initial issue, use the document update feature to document the issue further. However, do not change the "Event Date," or "PIM Date," as these dates carry through to final determination. For example, findings or violations that originated from an AV will have the same "Event Date," and "PIM Date," as the AV.
 - 2. As updates are made to the initial issue (such as final SDP letters and supplemental inspection reports), the original item's PIM entry must be updated to reflect the new information. This ensures traceability of an issue from discovery to final resolution and allows for easier tracking by the public. See the non-public RPS-Inspections Desktop Guide for instructions regarding how to make an update.

The updates to the public webpage occur in accordance with the schedule described in section 06.11, or as soon as possible if there is a known change in licensee performance as a result of NRC action. To update the webpage in a timely manner, regional staff must notify DRO (Reactor 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.

Below is a sample of the typical items included in a greater-than-Green finding that has been processed through the significance determination process and the supplemental inspection has been completed. The example demonstrates the process necessary to ensure that the finding information on the public webpage provides traceability of an issue from discovery to final resolution.

	What Shows Up in the PIM
Introduction of the initial issue:	An apparent violation was identified.....
Information the inspector will need to add to the PIM notes in the Tracking Data tab when the Final color is determined:	<u>First Update:</u> The finding was determined to be of low to moderate safety significance (White) in the final determination letter 05000XXX/20XXXXX, dated XXXX (MLXXXXXX), because.... (explain why it is White)

	What Shows Up in the PIM
Information the inspector will need to add to the PIM notes in the Tracking Data tab when NOV was closed in supplemental report	<u>Second Update:</u> The NRC completed a supplemental inspection was completed and is documented in inspection report 05000XXX/20XXXXX, dated XXXX (MLXXXXXAXXX). The supplemental inspection assessed the adequacy of the licensee's evaluation, extent of condition/cause review and associated corrective actions. The inspectors 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. This finding is closed.

06.06 Generating, Finalizing, and Closing Inspection Reports

- a. To finalize an inspection report in RPS-Inspections, the report needs to be taken from “Draft” to “Final” by the Branch Chief signing out the report. This action needs to be completed for all inspection reports, including those created for Operator Licensing Examinations and those reports that are generated outside of RPS-Inspections.
- b. The inspection report generator feature will automatically assign tracking numbers for findings, violations, and URIs documented in the inspection report when the report is in a “Final” status. For details on the numbering protocol, see Attachment 2.
- c. The following report information should be entered into the RPS-Inspections/Inspection Reports tab in a timely manner (typically within 14 days after issuance of the report) for each inspection report issued:

Lead Inspector	Required to be entered during closeout.
Report Sent Date	This is the date in which the report is signed out for approval and issuance.
Inspection Completion Date	For the quarterly integrated report this is the last day of the quarter; and for standalone reports it's the date of the exit (typically the last onsite date). For final SDP and traditional enforcement letters, it's the date the results are communicated to the licensee.
Report Closeout Date	This is the date the report status is changed to closed in RPS-Inspections.
EPID End Date	The date should be entered when the inspection report is closed. It is recommended that this date be between 45 days and 6-months after the date the report is closed. This will allow for the EPID to be used in case a licensee appeals the results of a report, or if corrections are identified, and a report needs to be reissued.
Report Status	The report status changed from open to closed
ADAMS Accession Number	Public version of the report/cover letter into the “Accession Number” Non-public version of the report into the “Reference Number” (and do not check the non-public box) For corrected or revised reports, see further guidance in 06.07 below

- d. Both the headquarters and regional staff are responsible for entering inspection reports into ADAMS in accordance with the ADAMS template.

06.07 Modifying Issued Inspection Report (Corrections, Revisions or Appeals)

- a. If an administrative error is found in an issued report, and needs to be corrected, an amended (or revised) report can be issued.¹ Refer to IMC 0611 for details of what needs to be included in the reissued report. (The word document in ADAMS should be the version used to make the corrections and the report is re-finalized to determine if the numbering of findings in the amended (revised) report need to be adjusted.) In addition, perform the following:
 - 1. The original report should be re-opened in RPS-Inspections, to allow for changes to be made, if needed. This includes placing the report in a draft status and placing what needs to be corrected in an “In-Progress” status. Make corrections and regenerate the report. Within 14 days of the corrected report being issued, the status of the report should be returned to a closed status and the ADAMS ML number for the amended (reissued) report should be entered into the “Accession Number” field in the Inspection Reports tab. The ADAMS ML number for the original report should be entered in the “Reference Number” field.
 - 2. Any of the information associated with the original report entry in RPS-Inspections, such as exit date, inspection dates, responsible org, etc. should not be changed or edited.
- b. Denials, appeals, and other licensee responses to findings and violations are addressed by re-opening the existing closed report which identified the issue in question. In addition, perform the following actions:
 - 1. Verify or reopen the EPID associated with the affected inspection report.
 - 2. Re-open the report, including placing the report in draft status and placing the scheduled inspection in an “In-Progress” status.
 - 3. Add the appropriate activity codes to review the appeal by the licensee: APLF (use for baseline), EPLF (use for EP), or SPLF (use for Security) to the scheduled item. All time spent conducting the review should be charged to the associated CAC for the activity code selected (except for supervisors).
 - 4. If this review does not change the results or conclusion of the original report, place the scheduled inspection in an approved status, return the report to a final status, and re-close the report after issuing a letter to the licensee describing the resolution. Add the ML number for this letter to the “Reference Number” in the Inspection Reports tab. In this case the inspection report will not be re-issued.

¹ The term ERRATA was used when the NRC sent out corrections to the report by providing a list of changes or a corrected page but later was used to describe a completely reissued report that included the correction(s). While inspectors still use the term ERRATA, the agency is now using the term “reissued,” or “amended.”

5. If this review changes the results or conclusion of the original report, make the appropriate changes to the report, and reflect those changes in RPS-Inspections. Refer to IMC 0611 for details of what needs to be included in the reissued report. Ensure that the cover letter provides a reference to the licensee's appeal letter, and an explanation regarding why the original report is being changed. When complete, place the inspection in an approved status, return the report to a final status, and re-close the report and the EPID after issuing the revised report
6. Any of the information associated with the original report entry in RPS-Inspections, such as exit date, inspection dates, responsible org, etc. should not be changed or edited.

06.08 Inspection Procedure Completion Status

- a. 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.
- b. 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 DRO/IRIB Branch Chief via email or memorandum.
- c. All baseline IPs that recommend reviewing samples on a quarterly or semi-annual frequency should have a completion status of "Incomplete" until either:
 1. the cumulative minimum sample size for the samples in the year has been reached for the procedure, or
 2. it is declared complete per one of the completion status codes.
- d. All baseline IPs that have an annual frequency should have a completion status of "Incomplete" until:
 1. the cumulative minimum sample size has been reached for the IP, or
 2. It is declared complete per one of the completion status codes.
- e. For all baseline IPs that have a biennial or triennial frequency:
 1. 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.
 2. The status is "Complete – in previous years" if the IP was completed a previous year within the triennial or biennial period.
 3. The completion status should be "Incomplete" if the IP is required to be completed during the current calendar year, until either: (1) the required minimum sample size is reached for the IPs; or (2) it is declared "Complete" per a completion status code.

- f. The specific IP completion status codes available in RPS-Inspections are listed below. See Attachment 3, "Inspection Completion Status Illustrative Examples:
1. 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.
 2. Complete - by Reference. A specific comment must accompany this selection explaining the reason. (See the non-public RPS-Inspections Desktop Guide for instructions on entering comments.) Two ways for this status to be valid are:
 - 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.
 - 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.
 3. 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.
 4. 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 the licensee did not conduct the activity covered by the IP. A specific comment must accompany this selection explaining the reason.
 5. 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.
 6. Incomplete. All required samples in the IP have not met the requirements as discussed in IMC 2515.
 7. 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.

06.09 Non-Result Items Tracked in RPS-Inspections

- a. The following non-result items shall be tracked in RPS-Inspections:
- Confirmatory Action Letters (CAL),

- License Renewal Commitment (not confirmed/complete during IP 71003 inspection),
 - Non-Conformance,
 - Order,
 - Security Event Report (SER), and
 - Licensee Event Reports (LER).
 - Written Event Report (WER) (for use by fuel cycle facilities only)
- b. For CALs, all required actions should not be entered in RPS-Inspections. A single item to track the CAL should be entered. The status of the actions associated with the CAL can be tracked by using the “Description” text field.
- c. Information related to safeguards events should contain no greater detail than its associated initial event notification report. Do not enter Safeguards Information into RPS-Inspections.
- d. The Regions and NSIR are responsible for adding Confirmatory Action Letters, Licensee Renewal Commitments, and Non-Conformance Orders.
- e. LERs (and eventually SERs) are populated into RPS-Inspections automatically from ADAMS. Following an LER or SER being entered in RPS-Inspections, the regions are responsible for:
- Ensuring all vital data has been translated correctly from the subject LER, including title, docket, event date, submitted date, LER number, revision number, description (optional), and ADAMS hyperlink. When the LER/SER applies to multiple dockets, ensure the LER/SER is only assigned to the lowest docket number. For LERs and SERs uploaded from ADAMS, the above fields will be in a read only status. If any data has been incorrectly imported from ADAMS to RPS-Inspections, contact RPSSupport.Resource@nrc.gov and ADAMSIM@nrc.gov for corrections.
 - Populating the projected closeout date, responsible organization (projects branch associated with the subject plant), closeout organization (branch responsible for performing the closeout inspection) and contact person (Branch Chief of respective projects branch).

To properly track a LER and SER the following dates should be used:

<u>Closure Date</u>	For LERs/SERs documented and closed in a quarterly integrated report it is the last day of the quarter. For LERs/SERs documented and closed in a standalone report it is the inspection exit date (typically the last day of onsite inspection).
<u>Event Date</u>	The date the actual Event occurred. Box 5 (“Event Date) on an LER. This is automatically populated when loaded into ADAMS
<u>Issue Date</u>	The date the LER or SER was signed/approved. Box 7 (“Report Date”) on an LER. This is automatically populated when placed in ADAMS.

06.10 Mid-Year Planning Letters, Assessment Letters, and Inspection Schedule Plans

- a. The regions will issue mid-year planning and annual assessment letters with the 24-month inspection schedule in accordance with IMC 0305 after the completion of the

second and fourth quarter, respectively. These letters are issued and placed on the public webpage in accordance with the table in Section 06.11.

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.

- b. Assessment follow-up letters typically do not include updated inspection schedule plans; however, they may note any inspection schedule 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 06.11.
- c. Assessment follow-up letters can also be issued on an as-needed basis between 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 06.11.
- d. The regions are responsible for:
 - 1. Entering Mid-Cycle Planning letters and all Assessment letters into ADAMS in accordance with the established ADAMS template, and
 - 2. Entering the ADAMS accession number for mid-year planning and all assessment letters into the RPS-Inspections/Inspection Reports tab.
- e. To support posting these documents to the NRC's public "Operating Reactors/Reactor Oversight Process" webpage in a timely manner, assessment letters and inspection schedule plan 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.
- f. The regional offices need to ensure that ROPassessment.Resource@nrc.gov is on distribution for all mid-cycle planning and assessment letters. IRAB staff is responsible for transferring the letters to the Q:\ drive and work with NRRWebServices.Resource@nrc.gov to place them on the public webpage.

06.11 ROP Web Posting Process, Content and Schedule.

- a. The ROP webpage displays the summary of inspection findings that appear in the PIM. The ROP webpage includes all issues designated as "VIO," "FIN," "AV," NRC identified, and self-revealing "NCV." For these issues to be displayed, the PIM checkbox must be checked, and the inspection report in which they are attached must be closed.
- b. Findings (classified as OUO-Security Related and higher) and PIs in the Security cornerstone will not be made public. However, any historical data entered before the third quarter 2004 will 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).

c. Web Posting:

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 working day.

Insp Report Type	Description	Due Date	Displayed on the Public Website
A	Assessment Report	90 days	Yes
D	Final Determination Report	90 days	Yes
F	Assessment Follow-up 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 (*)
Changes to the Action Matrix Summary (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)
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 AMS, if applicable.	51 days (AMS quarters 1 and 3)

Information	Due date (*)
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 or Escalated Enforcement Report	90 days from initial report
Corrections or change in the ROP webpages or SDP of any findings (greater-than-Green)	As needed
IRAB posts any available PIM entries, and inspection reports, to internal and external webpages	Monthly

(*) Days following the end of the calendar quarter unless noted otherwise

d. 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 tables above. 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 above.
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.

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. Refer to non-public report IR-12, "Cross Cutting Aspect," for evaluating cross cutting aspects (CCAs).

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 above.

- (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;
- (2) Final SDP letters, and
- (3) All assessment and assessment follow-up 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.

06.12 Inspection Program and Auto Report Generator Management.

- a. The Inspection Program Management (IPM) tab in RPS-Inspections is used to maintain the history of inspection documentation. When a change notice document has been issued, DRO is responsible for entering the change notice information into IPM.
- b. Based on Change Notice information, DRO will create, revise, or delete from the inspection program an inspection manual chapter (IMC), inspection procedure (IP), temporary instruction (TI), and/or operating experience smart sample (OpESS). In doing so, DRO will update the appropriate fields in IPM, such as document titles, sample sizes and inspection hours.
- c. The Auto Report Generator tab is used by DRO to maintain a current version of the inspection report and the cover letter templates, which ensures that changes made in IMC 0611 are captured in RPS-Inspections. DRO is also responsible for ensuring scope and sample "ghost text" is added/updated in the RPS-Inspections Auto Report Generator tab as new IPs and TIs are issued, or as requirements and samples are created, revised or deleted.

06.13 Administration of RPS-Inspections.

The RPS-Inspections Admin tab is used to add user roles to RPS-Inspections, and for adding operator licensing qualifications as applicable. User roles should be assigned

based on guidance in the non-public RPS-Inspections Desktop Guide. Each office that uses RPS-Inspections has dedicated staff that can access this tab to make changes or updates as needed.

06.14 Tools for Scheduling and Performance Monitoring.

Pre-established reports, located in the RRPS Reports tab, are used for planning, scheduling of examinations and inspections, and tracking of results. The RRPS Reports tab includes, but is not limited to, reports that contain information associated with sample completion and hours expended on inspection activities and procedures. Other reports include information on inspection manual change notices and documentation history, as well as operator licensing examiner schedules, availability, and training commitments.

06.15 Communicating System Problems/Potential Enhancements.

- a. All issues and suggestions for enhancements to RPS-Inspections should be reported to RPSSupport.Resource@nrc.gov.
- b. System changes and suggested enhancements are reviewed and prioritized by the RPS-Inspections CCB on a monthly basis. Final approval is provided by the RPS Executive CCB, which is controlled by OCIO, and scheduled for implementation.

0306-07 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"

10 CFR Part 9, "Public Records"

"Labor Reporting Policy & Guidance," dated April 8, 2019 (non-public ADAMS document ML19106A125)

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

Memo from Anne T. Boland (dated June 15, 2018), Subject: "Interim Guidance for Dispositioning Severity Level IV Violations with No Associated Performance Deficiency" (non-public ADAMS document ML18158A220)

NRC Yellow Announcement (YA) -19-0057, "Time Charging for Enforcement-Related Orders, Including Confirmatory Orders," dated June 17, 2019 (non-public ADAMS document ML19135A361)

END

Attachment 1 – Inspection Report 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.

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.

2. The year in the report number should correspond to the calendar year in which the first on-site direct inspection activities or the on-site administration of the operator licensing examination.
3. The numbering convention used for most reports prior to 2018 is listed below. Starting in calendar year 2018 ROP inspection reports and assessment letters were assigned the following numbers:

<u>Reports</u>	<u>2015-2017</u>	<u>Beginning in 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 Letter	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 (except for Security)	2**	2**
Operator Licensing Examination Reports	3**	3**
Security Mid-Year Planning Letter	401	Now included in 005 report
Security Annual Assessment Letter	402	Now included in 006 report
Security Assessment Follow-Up		403-405

<u>Reports</u>	<u>2015-2017</u>	<u>Beginning in 2018</u>
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		401-499 *401-449 for regional security reports 450-499 for Headquarters security reports (to support the auto-report generator)
Emergency Preparedness Mid-Year Planning Letter		Now included in 005 report
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		Part of 007-009
Emergency Preparedness Inspection Reports and 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. Report numbers 501 and 502 are no longer being used as separate assessment letters, and do not need to be referenced in the subject line of the 005 and 006 assessment letters.

Attachment 2 – Inspection Item Numbering

1. An item number is required for each item identified in the inspection report, including each of the six type codes: apparent violation (AV), deviations (DEV), finding (FIN), non-cited violation (NCV), notice of violation (NOV), unresolved item (URI), and traditional enforcement without an associate finding (TE).

LINCV, Observations, and Assessments do not get items numbers. If a URI becomes an apparent violation, finding, violation, or non-cited violation it should first be closed using the update feature and then a new finding entry should be made by using “I plan to document,” which will assign it a new 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, NOV, TE, URI), #### 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 05000346/2018004-01,
FIN 05000285/2018003-02,
NOV 05000443/2018301-03.

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 NOV	05000346	2018002	01	
1 st URI	05000346	2018002	02	
2 nd NOV	05000346	2018002	03	
1 st FIN	05000346	2018002	04	

Item Numbering for Dual-Unit Site				
1 st URI	05000295	2018002	01	Unit 1
1 st NOV	05000304	2018002	02	Unit 2
1 st FIN	05000295	2018002	03	both units
	05000304	2018002	03	
2 nd FIN	05000295	2018002	04	Unit 1
2 nd URI	05000295	2018002	05	both units
	05000304	2018002	05	

Attachment 3 –Inspection Completion Status Illustrative Examples

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) 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) 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.”

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.” A comment should also be added explaining the reason that the minimum sample size was not available for inspection.

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.” 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.)

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.

Example 5

A Temporary Instructions (TI), was completed at a site. The Branch Chief (or designee) should enter a completion status “Complete.”

Attachment 4 – 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
C1 C2	ML19191A101 11/04/19 CN 19-034	Major revision to align with changes made to RPS-Inspections with the addition of the auto report generator function. Also, includes a title change to the IMC and reformatting to allow for improved readability. Added text in response to OIG Audit OIG-18-A-13 (C1) and OIG Audit 13-A-16 (C2).		ML19191A050 0306-2347 ML18269A010