

Inoffice Review of

Event Reports

Procedure No.: 90712B

Issue Date: 10/1/76

SECTION I

INSPECTION OBJECTIVES

Ascertain via systematic review of each event report whether additional reactive inspection effort or other IE response is warranted, whether corrective action discussed in the licensee's report appears appropriate, and whether information reported to the NRC satisfies reporting requirements.

Ascertain whether the event is appropriate for classification as an Abnormal Occurrence pursuant to Section 208 of the Energy Reorganization Act of 1974.

Note: Section II of this procedure has not been made available to the public.

SECTION II
INSPECTION REQUIREMENTS

1. Upon receipt of initial notification of a reportable event, determine the following via initial screening:
 - a. Category and severity level per MC 1300.
 - b. Need for and initiate as appropriate:
 - . Immediate site inspection or investigation
 - . Immediate notifications including preliminary notification preparation
 - . Enforcement action (order or immediate action letter)
 - . Recommendation for a press release
 - . Notify the Office of State Programs if the event involves an Agreement State or an Agreement State licensee.
 - . Inclusion in the daily report
 - c. Whether additional communication with the licensee is necessary.
 - d. If and when a written report is due from the licensee.
 - e. On a preliminary basis the subsequent action to be taken by IE.
 - f. Whether the event should be classified as an Abnormal Occurrence. (Refer to MC 1110)
 - g. Whether the information involved with the event should be submitted to Licensing Boards. (Refer to MC 1530)
2. Upon receipt of the written report, review the report, taking into account the following:
 - a. Verify that details are clearly reported to the NRC as required by Technical Specifications, license conditions or regulations.

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b. Determine whether:

- . Reporting requirements have been met
- . The report is adequate to assess the event
- . The cause appears accurate and is supported by report details
- . Corrective actions appear appropriate to correct the cause
- . The generic applicability to other components, similar systems or activities within the facility or licensed operation has been considered
- . The Licensee Event Report (LER) form, when required, is complete and the responses appear to be appropriate.

c. Determine whether IE assessments incident to initial notification remain appropriate in light of more detailed information in the written report.

Revise planned actions based on initial screening of 1. above if necessary.

d. Assess the generic applicability of the LER (e.g., to the affected plant or licensed activity and other plants or licensed activities within the region.)

3. Based on the inspector's judgment and the safety significance of the event, conduct onsite followup of the technical aspects of selected events; e.g., technical problems, cause, corrective action, prevention of recurrence, and underlying generic concerns, in accordance with Parts II.1, 2, 5, and 6 of MC 92700B. It is neither required nor desired that each and every report be followed up onsite.
4. Per Parts II.3, and 4 of MC 92700B, conduct onsite followup on the administrative aspects of five (5) reports annually to verify that the licensee's management system for processing these reports is functioning properly.

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5. For reportable events other than those followed up by site inspection, document in a subsequent inspection report that the report was closed out based on review within the regional office. For events followed up by site inspection, document in accordance with MC 92700B.

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SECTION III
INSPECTION GUIDANCE

1. Complete initial screening upon initial notification of all reportable events. Initial notification may be by way of telephone, telegraph, facsimile, or written report.

For purposes of this procedure, the generic term "event report" is construed to encompass all reports of nonroutine or off normal events for which reporting requirements exist. These reporting requirements are part of license conditions, Technical Specifications, or Title 10 Rules and Regulations. Regulatory Guide 10.1 lists these reporting requirements for all types of licensees.

The reporting requirements for events contained in Regulatory Guide 1.16 are a subset of all reporting requirements in that they are associated only with Appendix A Technical Specifications for reactor facilities, and they are the only requirements for which the LER form specified in R.G. 1.16 must be used. MC- Interpretations, R.G. 1.16 amplifies degraded mode. The expanded interpretation of event reports beyond the narrow scope of R.G. 1.16 is used in this procedure to enable its use in reviewing all reports of events from all licensees, e.g., research reactors, fuel facilities, materials licensees, and reactors under construction.

Periodic, routine, or regularly recurring reports of events, such as reactor building integrated leak rate test, startup of reactor, annual operating report, etc., are not intended to be reviewed using this inspection procedure.

- 1b. If the event is considered to be a candidate for press release, advise the regional Public Affairs Officer that a press release may be warranted.
- 1f. MC 1110 delineates the criteria for determining whether an abnormal occurrence exists and establishes requisite IE Staff action upon identification of an abnormal occurrence.

2. If the report is not complete, not understandable, or is considered to contain inaccurate information, contact the licensee and resolve the matter. Obtain a commitment for a corrected report if the information reported to the NRC is found to be significantly in error. If it is determined that the incorrect information was purposely reported or if the licensee frequently reports misinformation, enforcement action would be appropriate. The threshold of significance of errors including omission, above which a corrected report is required, involves inspector judgment, and should be commensurate with consideration of citing the licensee for failure to report, which infers failure to report accurately. Errors of lesser significance should be discussed with the licensee with the intent that future reports be correct, but insistence on submittal of a corrected report for the specific event is not warranted.

- 2b. Of special significance is the cause code on the LER form used for computer entry. If the cause of the event is determined to be incorrectly coded, the licensee should submit a corrected LER form. The LER form need be prepared only for events reportable pursuant to R.G. 1.16.

- 2d. For purpose of gathering information regarding the extent of generic impact of an event, telephone calls to other licensees within the region may be beneficial. Where deemed appropriate by regional supervision, verbal communications should be utilized whenever there is a substantial potential for generic applicability. Written communication to licensee is not authorized.

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5. Documentation of review of those events that were not followed up onsite should identify the event report and indicate or reference the action taken pursuant to the review. The specifics of accounting and internal control of event reports under review is a regional prerogative. The inspection report documentation should distinguish between those events followed up onsite and those reports closed out based on inoffice review with no further action necessary.