



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 8, 1990

MEMORANDUM FOR: All NRR Employees
FROM: Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
SUBJECT: NRR OFFICE LETTER NO. 1100 - PROCESSING OF
INSPECTION REPORTS

PURPOSE

This office letter provides instructions on the processing of inspection reports for those inspections for which NRR is the lead office.

OBJECTIVES

The objectives of this office letter are to provide for a record of concurrences in the issuance of inspection reports prepared by NRR, to describe how differences and substantive changes are handled as inspection reports proceed through the concurrence chain, and to prescribe who signs inspection reports.

BACKGROUND

NRR inspections of Comanche Peak and TVA facilities are conducted by the staff of the Associate Director for Special Projects (ADSP). All other NRR inspections are conducted by the Division of Reactor Inspection and Safeguards (DRIS). Employees of other NRR divisions who conduct inspections, either singly or as a member of an NRR inspection team, are considered to have been detailed to DRIS for the performance of the inspection and the preparation of the inspection report.

All inspections must be performed in accordance with the NRC Inspection Manual, particularly those procedures in the 2500 series, "Reactor Inspection Program," and the 2700 series, "Licensee Contractor and Vendor Inspection Program." Inspection Manual Chapter (IMC) 0610, "Inspection Reports," contains requirements and guidance for the preparation of all inspection reports.

RESPONSIBILITIES AND AUTHORITIES

Director, Division of Reactor Inspection and Safeguards (DRIS)

Except for those inspections conducted and reports prepared under the jurisdiction of ADSP,

- a. Is responsible for the content and conclusions in NRR inspection reports.

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PDR ORG NRRB
PDC

CONTACT:
R. Paulus, PMAS
X23074

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DRIS-5
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LHR.

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- b. Resolves differences among participating inspectors and supervisors regarding inspection report content and conclusions that could not be resolved at lower management levels for NRR inspections.
- c. Forwards reports of NRR inspections of licensees to the appropriate Division of Reactor Projects for issuance to the licensee.
- d. Informs the Director of the appropriate Division of Reactor Projects of concerns raised by participating inspectors that have caused an inspector to deny concurrence on the issuance of an inspection report.
- e. Authorizes the issuance of reports of inspections at vendor sites not related to a specific licensee. (May delegate to Chief, Vendor Inspection Branch.)

Directors, Other Technical Divisions, NRR

Concur or comment on technical issues raised in inspection reports when requested to do so by DRIS.

Directors, Division of Reactor Projects

Transmit reports of NRR team inspections to the licensee.

Inspection Team Leader and the Lead Inspector

The inspection team leader, for team inspections, or the lead inspector, for other inspections, is responsible for

- a. Compiling the input from participating inspectors and contractors into an inspection report consistent with the requirements and guidance of IMC 0610.
- b. Ensuring that substantive changes to a participating inspector's report input are discussed with the originating inspector and any significant disagreements are either resolved or directed to the appropriate level of DRIS management for a decision regarding report content.
- c. Coordinating inspection findings and proposed enforcement actions with the appropriate regional office division.

Participating Inspectors

Participating inspectors are responsible and accountable for assuring that (1) their inspection report input accurately represents the scope and results of their examinations, and findings are supported by sufficient factual information to allow the reader to understand the issue; and (2) the technical and regulatory substance of their inspection work is reasonably represented in the inspection report as submitted by the team leader or lead inspector to the responsible DRIS branch chief for approval. If this is not the case, then the inspector is responsible for bringing the issue to the attention of the responsible DRIS section chief, then to the responsible DRIS branch chief and, if necessary, to the Director, DRIS, for resolution.

Associate Director for Special Projects (ADSP)

For inspections of Comanche Peak and TVA under the jurisdiction of ADSP, directors, inspection team leaders, lead inspectors, and participating inspectors have the same responsibilities and authorities as the corresponding individuals in DRIS previously described. In addition, inspection reports are processed within ADSP in accordance with the basic requirements and are issued by ADSP.

BASIC REQUIREMENTS

Some steps in the process of preparing and issuing inspection reports refer to DRIS supervisors and managers. For ADSP inspections, these steps refer to ADSP supervisors and managers.

General

When issued, the inspection report must be an NRC product based on the professional work of the participating inspectors and documented by the team leader or the lead inspector, who coordinates the input from the participating inspectors. The team leader or the lead inspector shall ensure that the report is consistent with current standards and practices in style, there is an adequate factual basis for the findings, the technical information is complete, and the safety importance and regulatory basis for the findings are stated in sufficient detail to support the appropriate regulatory action.

In accordance with NRR Office Letter No. 102, "Policy on Placing Documents in the Document Control System (DCS), the Central Files, and the Public Document Room (PDR)," inspection reports and related correspondence should be sent to the DCS, Central Files, and, as appropriate, the PDR. External distribution of inspection reports and related correspondence to licensees should be consistent with distribution by the regional office to that licensee. If necessary, contact the regional office to identify any special distribution. Internal distribution is made through the Regulatory Information Distribution System (RIDS) using Distribution Code IE01 for reactor licensees, Code IE09 for vendor inspections, or another appropriate distribution code. For assistance in selecting and using distribution codes, contact the Administration Section, Planning, Program & Management Support Branch.

Initial Processing of Inspection Reports

Each participating inspector prepares his or her input to the inspection report in accordance with IMC 0610 and provides this input to the team leader or the lead inspector.

The team leader or lead inspector is responsible for preparing the inspection report, including resolution of all substantive concerns raised by the participating inspectors regarding report content. The participating inspectors are responsible for the report, including directing any report content issues they believe have not been resolved satisfactorily to the appropriate management for resolution.

The completed inspection report is reviewed by first-level supervisors, usually the responsible DRIS section chief. In addition, the team leader or the lead

inspector coordinates the inspection results with the regional office to permit assessment of any impact on current inspections and enforcement items. After review, the inspection report is approved and signed by DRIS management, usually the responsible DRIS branch chief. For vendor inspection reports not related to a specific licensee, the responsible DRIS section chief normally approves the report.

Signatures on Inspection Reports

The team leader or the lead inspector signs the inspection report. All participating inspectors and contractors are listed on the inspection report cover page. The supervisor who approved the report also signs the inspection report cover page. If another individual reviewed the report for technical and regulatory considerations, that individual may also sign the inspection report cover page and note the function performed. In those instances in which a lead inspector is not assigned, all participating inspectors should sign the report. Inspection reports that describe substantive problems (e.g., matters for which escalated enforcement action may be considered, findings of multiple weaknesses in a licensee program or activity, multiple violations) are concurred in by the Director, DRIS.

Record of Concurrence

For each inspection report prepared by DRIS there must be a record of concurrence by participating inspectors. Such concurrence indicates agreement with the technical content of that part of the inspection report prepared by the concurring individual. See also NRR Office Letter No. 101, "Delegation of Signature Authority," as revised, for further discussion of the meaning of concurrence. The team leader, the lead inspector, or another knowledgeable inspector may concur for an inspector who is absent when the final report is processed. Telephone concurrence is acceptable when it is necessary to document an absent inspector's agreement with substantive revisions that may change the intent or a significant technical fact of the original report input. Concurrence in the contents of the inspection report is recorded as follows:

For vendor inspections, the Chief, Vendor Inspection Branch, normally signs the transmittal letter to the vendor. All participating inspectors are included in the concurrence chain of the transmittal letter. When escalated enforcement action is taken, the letter to the vendor is signed by the Director, DRIS, or the Associate Director for Inspection and Technical Assessment and includes concurrence by the EDO and the Office of Enforcement in addition to that of the participating inspectors. See NRR Office Letter No. 101, as revised.

For NRR team inspections of licensees, DRIS prepares the transmittal letter to the licensee for the signature of the Director of the appropriate Division of Reactor Projects. All participating inspectors, the responsible DRIS branch chief, and the Director, DRIS, are included in the concurrence chain. Other technical divisions should be included in the concurrence chain when technical issues for which prior review was requested are discussed in the report. The Director, DRIS, informs the Director of the appropriate Division of Reactor Projects of any substantive differences raised by a participating inspector who elected not to concur and management's resolution of such differences.

Substantive Changes Made to Inspection Reports

As an inspection report progresses through review and issuance, changes may be made to the report. Care must be taken to ensure that the factual content has not been materially changed without the knowledge of the originator, who in most cases is a participating inspector. As a minimum, substantive changes shall be discussed with the inspector to ensure that the inspector still concurs in the factual content of the report. If the inspector does not agree with the changes or some compromise, the inspector may seek review of the matter from successively higher levels of DRIS management up to the Director, DRIS.

If the inspector still does not agree with the inspection report contents, the inspector may choose not to concur in the document that transmits the report. In such cases, the inspector shall document his or her reasons for nonconcurrency and a management representative shall document the reasons for proceeding without the inspector's concurrence.

EFFECTIVE DATE

This office letter is effective immediately.

Original signed by

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

cc: J. Taylor, EDO
H. Thompson, DEDS
J. Amenta, IRM
SECY
OGC
NRC PDR

W. Russell, Region I
S. Ebnetter, Region II
A. Davis, Region III
R. Martin, Region IV
J. Martin, Region V

Distribution:

Central Files
NRC PDR
H. Smith (Original & 5 copies)
R. Paulus
M. Peranich
E. Butcher
V. Wilson
J. Larkins
F. Gillespie
T. Murley

ILPB RF
PMAS RF

NOTE

- 1. The Technical Editor reviewed this office letter on 11/22/89.
- 2. The proposed office letter was reviewed by the NRR Division Directors.

* SEE PREVIOUS CONCURRENCE

OFC	: IPDS/ILPB	: C/IPDS/ILPB	: C/ILPB/PMAS	: ADM/PMSB	: C/ADM/PMSB	: C/PMSB/PMAS
NAME	: RPaulus*	: MPeranich*	: EButcher*	: HSmith*	: VWilson*	: JLarkins*
DATE	: 11/22/89	: 11/22/89	: 11/22/89	: 11/29/89	: 11/ /89	: 11/ /89

OFC	: D/PMAS	: ADY/NRR	: DD/NRR	: D/NRR
NAME	: FGillespie*	: FMiraglia*	: JSnizek	: TMurley
DATE	: 12/ /89	: 12/ /89	: 1/ 2 /90	: 1/ 5 /90

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OFC	: D/PMAS #2	: ADT/NRR	: D/NRR	:
NAME	: FGillespie	: FMiraglia	: TMurley	:
DATE	: 12/0 /89	: 12/13/89	: 12/ /89	:

w Charles note
Change made - 12-14-89

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