



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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April 6, 2020

MEMORANDUM TO: Ho K. Nieh, Director  
Office of Nuclear Reactor Regulation

David C. Lew, Regional Administrator, RI  
Laura A. Dudes, Regional Administrator, RII  
Darrel J. Roberts, Regional Administrator, RIII  
Scott A. Morris, Regional Administrator, RIV

FROM: Christopher G. Miller, Director */RA/*  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

SUBJECT: UPDATED IMPLEMENTATION OF RESIDENT INSPECTOR  
SITE COVERAGE DURING COVID-19

This memorandum provides an update to the March 19, 2020 guidance on “Resident Office Site Coverage and Baseline Inspection During Maximum Teleworking for COVID-19.” The purpose of this guidance remains to protect the health of inspectors and site personnel, while maintaining oversight that supports reasonable assurance of adequate protection of public health and safety. The end date of this guidance is extended until further notice. The Division of Reactor Oversight (DRO) will continue to assess this guidance and update it as needed.

Regions are encouraged to use the attached updated table but will have flexibility to increase or decrease site coverage based on the following considerations:

- The specific health and safety circumstances of individual inspectors and their families, and availability of other inspectors as appropriate.
- Plant risk configuration (e.g., availability of safety-related SSCs, outage activities, planned maintenance activities).
- Ability to maintain awareness of unit safety performance (plant conditions and CAP entries) and planned activities, e.g., outage work, maintenance activities, from the resident inspectors’ remote work locations, including the quality of connectivity and information availability.
- COVID-19 conditions on site (confirmed COVID-19 cases, where and when).
- The local COVID-19 conditions around the site and the community where the inspectors reside, including directions from local authorities.

When elevated risk of COVID-19 infections are present in the local community or at a reactor site, inspectors should contact regional management to determine the best practices to consider for remote and onsite activities, informed by licensee practices and requests, and coordinated with NRC COVID-19 guidance. Regional management should increase engagement with site management as inspector coverage decreases.

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Following the COVID-19 public health emergency, DRO will assess reactor oversight program (ROP) progress and determine the need for a full or modified program. In the meantime, regional managers should work with inspectors to conduct the baseline program as appropriate, given the flexibilities and guidance in this memorandum.

Enclosure:

As stated

cc: M. Gavrilas  
D. Dorman  
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M. Miller  
J. Lara  
A. Vogel

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**Resident Office Site Coverage and Baseline Inspection  
During Maximum Teleworking for COVID-19  
Subject to the Considerations in this Memorandum**

Work Status	Plant Status	Event Response	Baseline Inspections
<p>Each site should be visited by a resident inspector approximately once every three business days (e.g., Monday then Thursday); unless determined otherwise by regional management.</p>	<p>Practice social distancing when on site and follow site specific requirements for COVID-19.</p> <p>Remotely access licensee information using available technology. Focus on independent review of important plant parameters and status of COVID-19 actions being taken by the licensee.</p> <p>Use all available technology including:</p> <ul style="list-style-type: none"> <li>• Remote connectivity via a licensee-provided computer (if available)</li> <li>• Remote access to licensee information via personal computer.</li> <li>• Phones and email, including licensee bridge lines that may be set up for scheduled briefings.</li> </ul>	<p>Use remote means for uncomplicated plant trips/transients and other 50.72 reports.</p> <p>Regional management (Branch chief) will authorize any on-site response for risk-significant events such as complicated scrams, loss of offsite power events, loss of shutdown cooling events and declared emergencies.</p> <p>If onsite presence is authorized, respond to the site per IP 71153.</p> <p>Practice social distancing when on site and follow site specific requirements for COVID-19.</p>	<p>Baseline inspections requiring travel <u>and</u> onsite presence such as EP exercises, FOF, triennial team inspections, including outage inspections, will be deferred during this period. Other baseline inspections will be evaluated for ability to complete objectives remotely.</p> <p>NRR and the regions will assess impacts to the baseline inspection program for all sites after the COVID-19 National Emergency subsides.</p>