



### C. Action

All exit meetings should include the following elements as appropriate:

#### 1. Schedule

Schedule the exit meeting such that the senior site representative (or designee) has an opportunity to attend, if possible. Generally, the exit meeting should be held with a senior licensee manager who is one level higher than the manager or supervisor responsible for the functional area that was inspected.

The time selected for an exit should permit both adequate time for preparation and maximum time for inspection. For power reactor team inspections, the exit meeting should normally be scheduled no earlier than late morning on the last day of the inspection. The resident inspectors shall be kept informed of the scheduled time of the exit meetings at power reactors; their attendance is highly encouraged. Resident inspectors are also strongly encouraged to attend all the final exit debriefs where significant issues are expected to be discussed.

#### 2. Preparation

Proper preparation for exit meetings is essential. Failure to prepare thoroughly for an exit meeting may make the inspectors appear unprofessional as well as unproductive. Because of poor preparation, inspection findings may not be understood or accepted.

Inspectors should practice the principle of “no surprises” throughout the inspection. Through a combination of regular communications during the inspection and pre-exit status meetings, the licensee should have full knowledge of the issues that will be summarized in the exit meeting before the meeting occurs. However, inspector(s) shall not provide any of the observations, findings, etc., in written form to the licensee. Any written information provided to the licensee shall be reviewed against Inspection Manual Chapter 0620, “Inspection Documents and Records,” to determine if it should be captured as an official record. In general, inspectors should not provide the licensee with any written material during inspections, with the exception of documentation requests and issued publicly available NRC documentation.

In preparing the oral presentation of inspection findings, the inspectors should strive for clarity and brevity. Routine exit meetings should normally be limited to a presentation of no more than one-hour. However, inspections that involve debriefing multiple complex technical issues may take more time (i.e., special inspections, AIT, etc.). To accomplish this, the inspectors must ensure that the discussion is organized and focused. Meeting notes or an agenda should be prepared to lead the inspectors through the meeting. It need not be a script but should outline topics to be covered and pertinent related information.

The inspectors should hold a pre-exit meeting with the licensee on all findings and characterizations that will be presented at the exit meeting. Resident inspectors are encouraged to attend this pre-exit. This pre-exit meeting should be an open interaction with the licensee to ensure that all aspects of the findings are understood and communicated. This pre-exit should be a thorough discussion of why the issue is more

than minor, how the significance was determined using the Significance Determination Process (SDP), cross-cutting aspect (if any), and the regulatory requirement that was not met, as a minimum.

### 3. Presentation

At exit meetings, the inspectors represent the NRC so they should strive to present a professional image. Personal preferences and opinions should not be expressed during the exit (especially if they differ from the NRC policy or positions). Inspectors should wear appropriate attire that enhances their professional image.

The inspection meeting is an NRC-led meeting convened to allow the inspectors to present preliminary inspection results to the licensee. As such, the team leader must maintain control of the meeting, ensuring that the discussion remains professional, on-track and efficient. The meeting should not be allowed to degrade into a technical debate or discussion of non-inspection related issues. If the NRC team leader finds that the purpose of the exit meeting cannot be achieved (for example, due to an overly argumentative licensee), the meeting should be terminated, and the appropriate NRC manager should be notified ASAP.

The information presented at an exit meeting is pre-decisional. Subsequent management review of the inspection results may lead to changes in the characterization of issues; this should be made clear during the meeting. The inspector(s) should also point out that if changes are made in the characterization of issues, the NRC will communicate the changes to the licensee prior to the issuance of the inspection report.

When findings are involved, the exit meeting should include a description of the finding, and the standard not met. If there is a cross-cutting aspect associated with the finding, it should be presented at the exit meeting to ensure licensee management is aware of the cross-cutting aspect. Specific details (more-than-minor determinations, how finding was processed through the SDP, etc.) should have already been discussed with the licensee during the pre-exit meeting. However, if requested by licensee management, a repeat of those details is appropriate.

When findings are not involved, the exit mtg should include a detailed discussion of the areas inspected and whether the objectives of the inspection were met. Inspectors are also free to share any observations from the inspection.

When discussing findings that are potentially greater than green, the team lead should communicate the results of the initial SDP evaluation, or the information needed to assess the significance.

If the licensee expresses strong opinions or disagreement with the characterization of an issue presented at the exit, the lead inspector should inform regional management.

The presentation should be directed toward the most senior licensee representative present. The inspectors should provide specific examples and avoid using generalities. The presentation must remain focused, following the meeting notes or agenda.

Each point should be presented concisely, with supporting facts as appropriate. In addition to findings, it is appropriate to discuss any insights of licensee performance during the exit meeting.

The team leader is responsible for the exit meeting presentation. As such, the team leader has the authority and may designate inspectors to present specific sections at the exit meeting. Conversely, the team leader may also choose to present the entire exit meeting.

If propriety information is reviewed during the inspection, the lead inspector should confirm at the exit meeting that NRC has (or has not) returned propriety materials used during the inspection.

#### 4. Questions, Comments, and Disputed Findings

Licensees should be encouraged to ask clarifying questions and provide additional information that could change or refute inspection findings both before and during the exit meeting. If a licensee expresses disagreement with an inspection finding (characterization, significance, cross-cutting aspect) at the exit meeting, inspectors should acknowledge the disagreement and seek to clearly understand their position. Inform the licensee that the findings are preliminary, and any disagreements will be discussed with the NRC management. Do not try to resolve disagreements during the exit meeting. Advise the licensee that they will be informed of any changes to the characterization of the findings prior to issuance in an inspection report. This may be as simple as a telephone call with the licensing contact stating if the NRC agrees with the licensee's position or if the NRC's characterization of the finding stands as presented. The inspectors should schedule a subsequent exit meeting (whether in person or telephonically) for more substantive changes in characterization.