

# NRC INSPECTION MANUAL

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INSPECTION MANUAL CHAPTER 0611 APPENDIX D

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GUIDANCE FOR PROBLEM IDENTIFICATION  
AND RESOLUTION INSPECTION REPORTS

Effective Date: July 1, 2026

## 0611D-01 GUIDANCE

Document an assessment of the licensee's Problem Identification and Resolution (PI&R) programs in the team inspection report in accordance with Inspection Manual Chapter (IMC) 0611, Section 12.02. Consider activities that were not only observed during this inspection but also previously documented inspection activities that occurred since the last triennial team assessment as they relate to current licensee performance.

Document an assessment of the licensee's performance regarding the effectiveness of the corrective action program which includes problem identification, problem evaluation and prioritization, and corrective actions.

Unlike other baseline inspection procedures, (IP) 71152 triennial team inspections seek to assess elements of the PI&R programs that may not rise to the level of ROP findings. Consequently, these inspections may, in some instances, document qualitative observations, minor performance deficiencies, and minor violations. The following guidance supplements that the guidance contained in IMC 0611.

1. The inspection report should describe the observations and basis for the assessment conclusion. The inspection scope for the assessment area should include documentation of the non-cited violations (NCVs), findings (FINs), licensee-identified violations (LIVs), or minor violations (MVs) that were reviewed for verification of corrective actions as well as open corrective actions to prevent recurrence (CAPRs) that were reviewed resulting from supplemental inspections. The report outline below contains the inspection requirements for the assessment area in a logically organized format.

Negative assessment conclusions should be supported by examples of performance deficiencies. When documenting such performance deficiencies, the discussion must include a disposition of the performance deficiency consistent with IMC 0612 and the Agency's enforcement process. Other conclusions should be supported by a brief basis statement and should include the scope of material reviewed in reaching the conclusion.

To document the review and closure of open CAPRs associated with prior supplemental inspection in RPS refer to IMC 0306, Section 06.09 for guidance.

2. Report Cover Letters

Inspection report cover letter guidance is contained in IMC 0611, Exhibit 4, "Cover Letter Templates." IMC 0611, Exhibit 4, contains a report cover letter template that can be modified to create a triennial PI&R inspection report cover letter.

1. Corrective Action Program Effectiveness

(a) Inspection Scope

Problem Identification<sup>1</sup> – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, any other activities that were competed to determine whether the licensee is identifying problems at the proper threshold and entering them into the corrective action program.

Problem Prioritization and Evaluation<sup>1</sup> – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, any other activities that were competed to determine whether the licensee is adequately prioritizing and evaluating problems. Identify the prioritizations and evaluations which were reviewed and were associated with previously documented NRC findings, minor violations (MV), or other inspection activities. Include pertinent reference numbers (e.g., condition report numbers, NRC finding numbers, NRC inspection reports).

Corrective Actions<sup>1</sup> – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, any other activities that were competed to determine whether corrective actions are effective, timely, and in the case of significant conditions adverse to quality, prevent recurrence. Identify the corrective actions that were reviewed and associated with previous documented NRC findings, minor violations, supplemental inspections, or other inspection activities. Include pertinent reference numbers (e.g., condition report numbers, NRC finding numbers, NRC inspection reports).

The inspection scope should include those issues that were designated as part of the 5-year review. In addition, the specific NCVs, FINs, LIVs, MVs, and open CAPRs that were reviewed should be documented.

(b) Assessment

Problem Identification<sup>1</sup> – Document a conclusion regarding the licensee's effectiveness in problem identification and include the bases for the conclusion. Discuss issues and relevant observations regarding problem identification.

Problem Prioritization and Evaluation<sup>1</sup> – Document a conclusion regarding the licensee's effectiveness in prioritizing and evaluating problems and include the bases for that conclusion. Discuss issues relative to:

- the effectiveness of the licensee's process for prioritizing problems for resolution,
- technical adequacy and depth of evaluations (including root cause analysis where appropriate),

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<sup>1</sup> These three areas may be combined into a single write-up

- adequate consideration of operability and reportability requirements, and
- appropriate consideration of risk in prioritizing or evaluating problems for resolution

Corrective Actions<sup>1</sup> – Document a conclusion regarding the licensee’s ability to develop and implement effective corrective actions and include the bases for the conclusion. Discuss issues and relevant observations regarding corrective actions, including, for significant conditions adverse to quality, issues associated with corrective actions taken to prevent recurrence.

Attachment 1: Revision History for IMC 0611 Appendix D

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)
	<a href="#">ML031610702</a> 06/24/03 CN 03-021	Initial Issuance		
C1	<a href="#">ML061560471</a> 06/22/06 CN 06-015	PI&R Team Inspection Report format revised to accommodate the safety culture initiative described in Staff Requirements – SECY-04-0111 – “Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture,” dated August 30, 2004	Yes 07/01/2006	<a href="#">ML061570081</a>
	<a href="#">ML111881201</a> 10/28/11 CN 11-024	Relocated example cover letter guidance to IMC 0612 Exhibit 4.		
	<a href="#">ML12345A022</a> 08/13/13 CN 13-017	Revised to address regional reliability effort change recommendations. Removed sample inspection report for future incorporation into IMC 0612 Exhibit 3.		<a href="#">ML13052A347</a> FF 0612D-1785, 1827, 1843, 1844, 1845, 1846, 1847
	<a href="#">ML17130A997</a> 12/13/17 CN 17-029	Editorial update made to reflect the splitting IMC 0612 into IMC 0611 for documentation and IMC 0612 for issue screening.		
	ML22339A153 12/29/22 CN 22-029	Completed five-year review. IMC 0611 App D. FBFs 1616 & 2470 remain open.		N/A

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)
	ML23222A168 10/31/23 CN 23-032	Revised to incorporate changes to IP 71152 as a result of recommendations from the Problem Identification and Resolution Comprehensive Review (ML20247J602).		ML23222A180
	ML24269A085 12/06/24 CN 24-039	Revised to remove guidance for documenting review and closure of open CAPRs for prior supplemental inspections and replace with reference to IMC 0306 section 06.09.		ML24269A101
	ML25338A327 05/01/26 CN 26-019	Revised due to the team inspection frequency changing to triennial and the scope narrowed to licensee corrective action programs in accordance with SRM SECY-26-0014.		ML25274A088 ML25301A230