INSPECTION MANUAL CHAPTER 0609 ATTACHMENT 4

INITIAL CHARACTERIZATION OF PERFORMANCE DEFICIENCIES

Effective Date: 05/18/2026

0609.04-01 PURPOSE

The framework described in this attachment to the Significance Determination Process (SDP) is designed to provide guidance to NRC inspectors and management for use in the initial characterization of safety or security performance deficiencies within the seven safety cornerstones of the Reactor Oversight Process (ROP). The initial characterization of performance deficiencies is designed to perform three functions:

a. Provide an opportunity to the inspector to document all applicable information regarding the performance deficiency, and any associated impact on safety or security, in a consolidated format (Table 1).

b. Support the identification of safety cornerstone(s) affected by the degraded condition or programmatic weakness resulting from the performance deficiency (Table 2).

c. Direct the inspector to the appropriate SDP appendix of Inspection Manual Chapter (IMC) 0609 for further evaluation (Table 3).

0609.04-02 GUIDANCE

Each performance deficiency entering IMC 0609, regardless of the cornerstone under which it is identified, is assessed to determine whether it screens to Minor or Green before further evaluation occurs. Performance deficiencies that are determined to be Minor are not findings, and therefore, not subjected to further evaluation by the SDP. Performance deficiencies that are more-than-Minor are considered findings and may screen to Green or be subjected to further evaluation by the SDP.

02.01 Performance Deficiency Consolidated Information Sheet (Table 1)

The objective of Table 1 is to provide the opportunity to document and review all the supporting information pertaining to a performance deficiency in a concise format. Use of this table is optional. Below are detailed descriptions of the table sections to facilitate documentation:

a. Clearly Articulated Performance Deficiency. State the identified performance deficiency, provide the requirement that was not met, and why the issue was reasonably within the licensee's ability to foresee and prevent. Each performance deficiency is treated independently in the SDP.

b. Factual Description of Degraded Condition or Programmatic Weakness. State the facts pertaining to the degraded condition or programmatic weakness without any hypothetical situations, failures, or occurrences. For conditions that involve degraded equipment,

include the affected system(s), structure(s), component(s) (SSCs), and/or train(s), to include their associated function(s), and how they impacted safety or security. The Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones primarily deal with degraded conditions. For a programmatic weakness, include the affected program(s) and describe how the programmatic weakness impacted safety or security. Other pertinent information to consider are root/apparent/proximate cause evaluations, extent of condition assessments, interdependencies with other systems, perspectives from the licensee, and the duration of the degraded condition or programmatic weakness (i.e., exposure time).

c. Logical Link(s) that Connect(s) the Performance Deficiency to the Degraded Condition or Programmatic Weakness. Clearly articulate the nexus (i.e., logical link(s)) between the performance deficiency and the degraded condition or programmatic weakness. The performance deficiency should most often be identified as the proximate cause of the degraded condition or programmatic weakness. The determination of cause need not be based on a rigorous root cause evaluation, but rather on a reasonable assessment and judgment of the staff. If the proximate cause of multiple degraded conditions or programmatic weaknesses is the same, there may be just one independent performance deficiency provided that it is not defined at a level associated with a cross-cutting area as defined in IMC 0310.

d. Supporting Documentation and References. List the documents used during the inspection process. Examples include, but are not limited to, inspection procedures, plant status, licensee event reports, and condition reports.

NOTE: If Table 1 is used to document information pertaining to a security performance deficiency, then the table will have to be properly labeled as Safeguards or Official Use Only - Security Related Information.

02.02 Cornerstones Affected by Degraded Condition or Programmatic Weakness (Table 2)

The objective of Table 2 is to support the identification of safety cornerstones affected by the degraded condition or programmatic weakness resulting from the performance deficiency. The affected cornerstones may already have been identified previously (e.g., scope of the inspection procedure, inspector experience and knowledge of the ROP); however, Table 2 helps to support this determination. Below is a description to facilitate filling out Table 2:

a. Read through the degraded conditions and programmatic weaknesses listed in all seven cornerstones and check all that are applicable. For the degraded conditions, many of the options are associated with SSCs and events.

b. Review all the checked boxes and determine which cornerstone(s) are affected by the degraded condition or programmatic weakness.

02.03 SDP Appendix Router (Table 3)

Typically, one affected cornerstone is identified in Table 2. The inspector should use the SDP Appendix Router (Table 3) to determine the appropriate SDP appendix for further evaluation of the performance deficiency. If more than one cornerstone is affected, and Table 3 results in direction to one (or multiple) SDP appendices, the inspector and management need to ultimately identify one cornerstone based on reasonable judgment

of the situation. If the performance deficiency is determined to be a more-than-Minor finding and progresses to a detailed risk evaluation, the inspector, Senior Reactor Analyst (SRA), and management should confirm the identified cornerstone based on the proportional contribution from each cornerstone to the total risk estimation.

NOTE: If the SDP Appendix Router directs the user to a particular appendix, and upon further evaluation that SDP appendix is not capable of evaluating the performance deficiency and associated degraded condition or programmatic weakness, the inspection staff and applicable SRA, with support from management, should determine if IMC 0609, Appendix M is an appropriate tool. A planning Significance and Enforcement Review Panel (SERP) is required before transitioning to Appendix M other than when directed explicitly by procedure. Refer to IMC 0609, Attachment 1 for additional guidance.

0609.04-03 REFERENCES

IMC 0310, “Aspects Within The Cross-Cutting Areas”

IMC 0609, Appendix A, “The At-Power Significance Determination Process”

IMC 0609, Appendix B, “Emergency Preparedness SDP”

IMC 0609, Appendix C, “Occupational Radiation Safety SDP”

IMC 0609, Appendix D, “Public Radiation Safety SDP”

IMC 0609, Appendix E, “Security SDP for Power Reactors”

IMC 0609, Appendix F, “Fire Protection SDP”

IMC 0609, Appendix G, “Shutdown Operations SDP”

IMC 0609, Appendix I, “Licensed Operator Requalification Program SDP”

IMC 0609, Appendix K, “Maintenance Risk Assessment and Risk Management SDP”

IMC 0609, Appendix L, “Extensive Damage Mitigation Guidelines SDP”

IMC 0609, Appendix M, “Significance Determination Process Using Qualitative Criteria”

IMC 0609, Attachment 1, “Significance and Enforcement Review Panel (SERP) Process”

IMC 0612, “Issue Screening”

END

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Table 1: Performance Deficiency Consolidated Information Sheet
Table 2: Cornerstones Affected by Degraded Condition or Programmatic Weakness
Table 3: SDP Appendix Router

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Attachment 1: Revision History for IMC 0609 Attachment 4

Table 1: PERFORMANCE DEFICIENCY CONSOLIDATED INFORMATION SHEET
Clearly Articulated Performance Deficiency:
Factual Description of Degraded Condition or Programmatic Weakness:
Logical link(s) that Connect(s) the Performance Deficiency to the Degraded Condition or Programmatic Weakness:
Supporting Documentation and References:

Table 2: CORNERSTONES AFFECTED BY DEGRADED CONDITION OR PROGRAMMATIC WEAKNESS
(✓) Check the appropriate boxes

INITIATING EVENTS CORNERSTONE	MITIGATING SYSTEMS CORNERSTONE	BARRIER INTEGRITY CORNERSTONE
❒ A. Primary System LOCA initiator contributor (e.g., RCS leakage from pressurizer heater sleeves, RPV piping penetrations, CRDM nozzles, PORVs, SRVs, ISLOCA issues, etc.) ❒ B. Transient initiator contributor (e.g., reactor/turbine trip, loss of offsite power, main steam/feedwater piping degradations, internal fires or flooding, etc.) ❒ C. Support System initiator contributor (loss of service water, loss of instrument air, DC power, etc.) ❒ D. Steam Generator Tube Rupture (SGTR) ❒ E. External Event initiators (limited to fire and internal flooding)	❒ A. Mitigating Systems and PRA Functionality ❒ Core Decay Heat Removal Degraded ❒ Short Term Heat Removal Degraded ❒ Primary (e.g., Safety Injection–PWR only; main feedwater, HPCI, and RCIC - BWR only) High Pressure–Both Types Low Pressure–Both Types ❒ Secondary - PWR only (e.g. AFW, main feedwater, ADVs) ❒ Long Term Heat Removal Degraded (e.g., ECCS sump recirculation, suppression pool) ❒ B. External Event Mitigating Systems (Seismic/ Flood/Severe Weather Protection Degraded) ❒ C. Reactor Protection System (RPS) ❒ D. Fire Brigade ❒ E. Flexible Coping Strategies (FLEX) ❒ F. Maintenance Rule Scoping and Performance Monitoring ❒ G. Risk Significant Operator Actions	❒ A. Fuel Cladding Integrity ❒ Reactivity Management (e.g., exceed licensed power limit, command and control, uncontrolled control rod movement, inadvertent RCS dilution or cold water injection) ❒ Mismanagement of foreign material exclusion program (e.g. loose parts) ❒ B. RCS Boundary as a mitigator following plant upset (e.g., pressurized thermal shock) Note: All other RCS boundary issues, such as leaks, will be considered under the Initiating Events Cornerstone. ❒ C. Reactor Containment / Drywell Barrier Degraded ❒ Actual Breach or Bypass (e.g., leakage past penetration seals, isolation valves that can contribute to ISLOCA, vent and purge system. Failure of SSCs critical to suppression pool integrity) ❒ Heat Removal, Hydrogen or Pressure Control Systems Degraded ❒ D. Control Room, Auxiliary, Reactor, or Spent Fuel Building Barrier Degraded ❒ E. Spent Fuel Pool (SFP) ❒ Maintaining subcritical conditions ❒ Spent Fuel Pool Water Inventory and/or Temperature (i.e., cooling)

EMERGENCY PREPAREDNESS CORNERSTONE	OCCUPATIONAL RADIATION SAFETY CORNERSTONE	PUBLIC RADIATION SAFETY CORNERSTONE
❒ Failure to Comply with a Planning Standard or Risk-Significant Planning Standard ❒ Actual Event Implementation Problem	❒ ALARA Planning or Work Controls ❒ Exposure or Over-exposure problem ❒ Ability to Assess Dose Compromised	❒ Radioactive Effluent Release Program ❒ Radioactive Environmental Monitoring Program ❒ Radioactive Material Control Program ❒ Transportation or Part 61
SECURITY CORNERSTONE		
❒ Performance deficiencies identified under the IMC 2201, Security and Safeguards Inspection Program		

Table 3: SDP APPENDIX ROUTER
If the performance deficiency and associated degraded condition or programmatic weakness is in the licensee's: 1. Emergency Preparedness cornerstone, STOP. Go to IMC 0609, Appendix B. 2. Occupational Radiation Safety cornerstone, STOP. Go to IMC 0609, Appendix C. 3. Public Radiation Safety cornerstone, STOP. Go to IMC 0609, Appendix D. 4. Security cornerstone, STOP. Go to IMC 0609, Appendix E. 5. Initiating Events, Mitigating Systems, or Barrier Integrity cornerstones, CONTINUE below.
Read sections A through F and answer the YES or NO questions. If NO is answered to all the questions in sections A through F, the user is directed to IMC 0609, Appendix A. A. Shutdown, Refueling, and Forced Outages: 1. Does the performance deficiency pertain to operations, an event, or degraded condition while the reactor vessel is defueled, relate to fuel handling issues, or involve spent fuel pool issues? a. If YES ➛ STOP. Go to IMC 0609, Appendix A. b. If NO, Continue. 2. Does the performance deficiency pertain to operations, an event, or a degraded condition while the plant was shut down ? NOTE: Appendix G is applicable during refueling, forced, and maintenance outages starting when the licensee has met the entry conditions for the system used to remove residual heat and ends when this system has been secured during plant heat-up. a. If YES ➛ STOP. Go to IMC 0609, Appendix G. b. If NO, Continue. B. Licensed Operator Requalification: Does the performance deficiency involve the operator licensing requalification program or simulator fidelity? a. If YES ➛ STOP. Go to IMC 0609, Appendix I. b. If NO, Continue.

C. Maintenance Rule Risk Assessments:

Does the performance deficiency involve the licensee's assessment and management of risk associated with performing maintenance activities under all plant (operating or shutdown) conditions in accordance 10 CFR 50.65(a)(4) and the Baseline Inspection Procedure (IP) 71111.13, "Maintenance Risk Assessment and Emergent Work Control"?

a. If YES ➛ STOP. Go to IMC 0609, Appendix K.

b. If NO, Continue.

D. PRA Configuration Risk Associated with RICT, 10 CFR 50.69, or NFPA 805:

Is the performance deficiency associated with the underestimation of PRA configuration risk associated with Risk Informed Completion Times (RICT), 10 CFR 50.69, or National Fire Protection Association (NFPA) 805 for issues not directly associated with degradation of plant equipment or other physical conditions in the plant that resulted in the need to invoke the licensee risk-informed program?

a. If YES ➛ STOP. Go to IMC 0609, Appendix K.

b. If NO, Continue.

E. 10 CFR 50.155(b)(2) Mitigating Strategies:

Is the performance deficiency associated with the mitigating strategies to maintain or restore core cooling, containment, and spent fuel pool cooling?

a. If YES ➛ STOP. Go to IMC 0609, Appendix L.

b. If NO, Continue.

F. Fire Protection:

1. Does the performance deficiency involve discrepancies with the fire brigade?

a. If YES ➛ STOP. Go to IMC 0609, Appendix A.

b. If NO, Continue.

2. Does the performance deficiency involve: (1) A failure to adequately implement fire prevention and administrative controls for transient combustible materials, transient ignition sources, or hot work activities? (2) Fixed fire protection systems or the ability to confine a fire? (3) Or affect the ability to reach and maintain safe shutdown conditions in case of a fire?

a. If YES➛ STOP. Go to IMC 0609, Appendix F.

b. If NO➛ STOP. Go to IMC 0609, Appendix A.

Exhibit 1: Cornerstone Objectives and Attribute Tables

Cornerstone	REACTOR SAFETY – Initiating Events
Objective	To limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations.
Attributes	Areas to Measure
Design Control	Initial Design and Plant Modifications
Protection Against External Factors	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Switchyard Activities, Grid Stability
Configuration Control	Shutdown Equipment Lineup, Operating Equipment Lineup
Equipment Performance	Availability, Reliability, Maintenance, Barrier Integrity (SGTR, ISLOCA, LOCA (S,M,L)), Refueling/Fuel Handling Equipment
Procedure Quality	Procedure Adequacy (Maint, Test, Ops)
Human Performance	Human Error

Cornerstone	REACTOR SAFETY – Mitigating Systems
Objective	To ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage).
Attributes	Areas to Measure
Design Control	Initial Design and Plant Modifications
Protection Against External Factors	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Seismic, Weather
Configuration Control	Shutdown Equipment Lineup, Operating Equipment Lineup
Equipment Performance	Availability, Reliability
Procedure Quality	Operating (Post-event) Procedures (AOPs, SOPs, EOPs), Maintenance and Testing (Pre-event) Procedures
Human Performance	Human Error (Post-event), Human Error (Pre-event)

Cornerstone	REACTOR SAFETY – Barrier Integrity
Objective	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.
Attributes	Areas to Measure (to Maintain Functionality of Fuel Cladding)
Design Control	Physics Testing, Core Design Analysis (Thermal Limits, Core Operating Limit Report, Reload Analysis, 10 CFR 50.46)
Configuration Control	Reactivity Control (Control Rod Position, Reactor Manipulation, Reactor Control Systems), Primary Chemistry Control, Core Configuration (Loading)
Cladding Performance	Loose Parts (Common Cause Issues), RCS Activity Level

Cornerstone	REACTOR SAFETY – Barrier Integrity
Objective	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.
Procedure Quality	Procedures which could impact cladding
Human Performance	Procedure Adherence (FME, Core Loading, Physics Testing, Vessel Assembly, Chemistry, Reactor Manipulation), FME Loose Parts, Common Cause Issues
Attributes	Areas to Measure (to Maintain Functionality of RCS)
Design Control	Plant Modifications
Configuration Control	System Alignment, Primary/Secondary Chemistry
RCS Equipment and Barrier Performance	RCS Leakage, Active Components of Boundary (Valves, Seals), ISI Results
Procedure Quality	Routine OPS/Maintenance Procedures, EOPs and related Off-Normal Procedures invoked by EOPs
Human Performance	Routine OPS/Maintenance Performance, Post Accident or Event Performance
Attributes	Areas to Measure (to Maintain Functionality of Containment)
Design Control	Plant Modifications, Structural Integrity, Operational Capability
Configuration Control	Containment Boundary Preserved, Containment Design Parameters Maintained
SSC and Barrier Performance	S/G Tube Integrity, ISLOCA Prevention, Containment Isolation, SSC Reliability/Availability, Risk Important Support Systems Function
Procedure Quality	Emergency and Operating Procedures, Risk Important Procedures (OPS, Maintenance, Surveillance)
Human Performance	Post Accident or Event Performance, Routine OPS/Maintenance Performance
Attributes	Areas to Measure (to Maintain Radiological Barrier Functionality of Control Room and Auxiliary Building – PWR, and Standby Gas Trains – BWR only)
Design Control	Plant Modifications, Structural Integrity
Configuration Control	Building Boundaries Preserved
SSC and Barrier Performance	Door, Dampers, Fans, Seals, Instrumentation
Procedure Quality	EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures
Human Performance	Post Accident or Event Performance, Routine OPS/Maintenance Performance
Attributes	Areas to Measure (to Maintain Functionality of Spent Fuel Pool Cooling System)
Design Control	Plant Modifications, Structural Integrity
Configuration Control	System Alignment
SSC Performance	Pumps, Valves, Instrumentation

Cornerstone	REACTOR SAFETY – Barrier Integrity
Objective	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.
Procedure Quality	EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures
Human Performance	Post Accident or Event Performance, Routine OPS/Maintenance Performance

Cornerstone	REACTOR SAFETY – Emergency Preparedness
Objective	To ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.
Attributes	Areas to Measure
ERO Readiness	Duty Roster, ERO Augmentation System, ERO Augmentation Testing, Training
Facilities and Equipment	ANS Testing, Maintenance Surveillance and Testing of Facilities, Equipment and Communications Systems, Availability of ANS, Use in Drills and Exercises
Procedure Quality	EAL Changes, Plan Changes, Use in Drills and Exercises
ERO Performance	Program Elements Meet 50.47(b) Planning Standards, Actual Event Response, Training, Drills, Exercises
Offsite EP	FEMA Evaluation

Cornerstone	RADIATION SAFETY – Occupational Radiation Safety
Objective	To ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation.
Attributes	Areas to Measure
Plant Facilities/Equipment and Instrumentation	Plant Equipment Instrumentation, (ARM Cals & Availability, Source Term Control), Procedures (Radiation Protection and Maintenance)
Program & Process	Procedures (HPT, Rad Worker, ALARA); Exposure/Contamination Control and Monitoring (Monitoring and RP Controls), ALARA Planning (Management Goals, Measures - Projected Dose)
Human Performance	Training (Contractor HPT Quals, Radiation Worker Training, Proficiency)

Cornerstone	RADIATION SAFETY – Public Radiation Safety
Objective	To ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain as a result of routine civilian nuclear reactor operation.
Attributes	Areas to Measure
Plant Facilities/Equipment and Instrumentation	Process Radiation Monitors (RMS) (Modifications, Calibrations, Reliability, Availability), REMP Equipment, Meteorology Instruments, Transportation Packaging, Procedures (Design/Modifications, Equipment Calculations, Transportation Packages, Counting Labs)
Program & Process	Procedures (Process RMs & REMP, Effluent Measurement QC, Transportation Program, Material Release, Meteorological Program, Dose Estimates), Exposure and Radioactivity Material Monitoring and Control (Projected Offsite Dose, Abnormal Release, DOT Package Radiation Limits, Measured Dose)
Human Performance	Training (Technician Qualifications, Radiation & Chemical Technician Performance)

Cornerstone	SAFEGUARDS – Security
Objective	To provide assurance that the licensee's security system and material control and accountability program use a defense-in-depth approach and can protect against (1) the design basis threat of radiological sabotage from external and internal threats, and (2) the theft or loss of radiological materials.
Attributes	Areas to Measure
Physical Protection System	Protected Areas (Barriers, Alarms, Assessment), Vital Areas (Barriers, Alarms, Assessment)
Access Authorization	Personnel Screening, Behavior Observations, Fitness for Duty
Access Control	Search, Identification
Response to Contingency Events	Protective Strategy, Implementation of Protective Strategy
Material Control and Accounting	Transportation of Radioactive Material, Records; Procedures, Inventories
Protection of Safeguards Information	Designation and Storage, Processing, Reproduction, and Transmitting, Removal and Destruction
Cyber Security	Protection of Systems and Networks, Cyber Security Program Plan and Procedures

Attachment 1: Revision History for IMC 0609 Attachment 4

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)
N/A	ML063060347 01/10/08 CN 08-002	Revision History reviewed for last four years. IMC0609 Attachment 4 has been created to remove Phase 1 - Characterization and Initial Screening of Findings of the significance determination process (SDP) from IMC0609 Appendix A.	NO	ML073460588
N/A	ML101400531 06/19/12 CN 12-010	Removed the Phase 1 screening criteria pertaining to the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones and placed the screening criteria in IMC 0609, Appendix A. Revised Table 1 so it is applicable to all cornerstones. Updated Table 2 to add some more items to the Reactor Safety Performance area. Revised Table 3 to clarify which SDP appendices are applicable given the cornerstones of interest and details of the finding. Incorporated feedback from ROPFF 0609.04-1458, 0609.04-1372, and 0609.04-1678. This is a complete reissue no red line.	Senior Reactor Analysts and headquarters staff provided detailed instructor-led training to resident inspectors, region-based inspectors, and other regional staff. June 2012	ML110240265 Closed FBF: 0609.04-1372 ML12171A239 0609.04-1678 ML12171A241
N/A	ML16056A317 10/07/16 CN 16-026	Table 3, SDP Appendix Router was revised to accommodate SDP IMC 0609, Appendix O, “Significance Determination Process for Mitigating Strategies and Spent Fuel Pool Instrumentation” (Orders EA-12-049 and EA-12-051).	No training is required.	ML16060A285
N/A	ML19198A195 7/17/19	Made draft publicly available to discuss at the July 31, 2019, ROP monthly public meeting.	N/A	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)
N/A	ML19011A326 12/13/19 CN 19-040	Revised document to reflect retirement of IMC 0609 Appendix O, “Significance Determination Process for Mitigating Strategies and Spent Fuel Pool Instrumentation” and to align with changes to IMC 0609 Appendix A (ROPFF 0609.04-2295). Table 2 was modified to include support system initiators (ROPFF 0609.04-2289) and move reactivity management issues to the barrier integrity cornerstone (ROPFFs 0609.04-2133 and 0609.04-2201). Table 3 was modified to direct users to IMC 0609 Appendix A for spent fuel pool issues during shutdown (ROPFF 0609.04-2084). Document was reviewed and minor changes were made to allow for use with new reactor designs (AP1000). In accordance with Management Directive 8.13 and COMSECY-16-0022, the Commission was notified of the described changes via SECY-19-0037, “Reactor Oversight Process Self-Assessment for Calendar Year 2018,” (ML19042A100). The Commission was also notified of the revisions in a Commissioner Assistants’ Note (ML19302F254).	No training is required.	ML19014A064 Closed FBFs: 0609.04-2084 ML19014A099 0609.04-2295 ML19014A103 0609.04-2133 ML19014A100 0609.04-2201 ML19014A101 0609.04-2289 ML19064A974
N/A	ML24155A201 10/25/24 CN 24-031	Added direction to Appendix K for PRA configuration control issues. Updated document styles consistent with IMC 0040 guidance and reset the 5-year review requirement. No open feedback forms to address.	No training is required.	ML24156A091

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)
	ML26098A306 04/30/26 CN 26-015	Editorial changes made in support of the relocation of more-than-Minor guidance from IMC 0612 to IMC 0609. Exhibit 1 Cornerstone tables relocated from IMC 0612, Appendix B. These revisions were recommended as a result of the ADVANCE Act 507 Report to Congress that discussed the revision of the ROP Baseline Inspection Program, approved by SRM-SECY-26-0014.		ML25274A088 ML25301A230