

NRC INSPECTION MANUAL

IRAB

INSPECTION MANUAL CHAPTER 0612 APPENDIX B

ISSUE SCREENING DIRECTIONS

Effective Date: 05/18/2026

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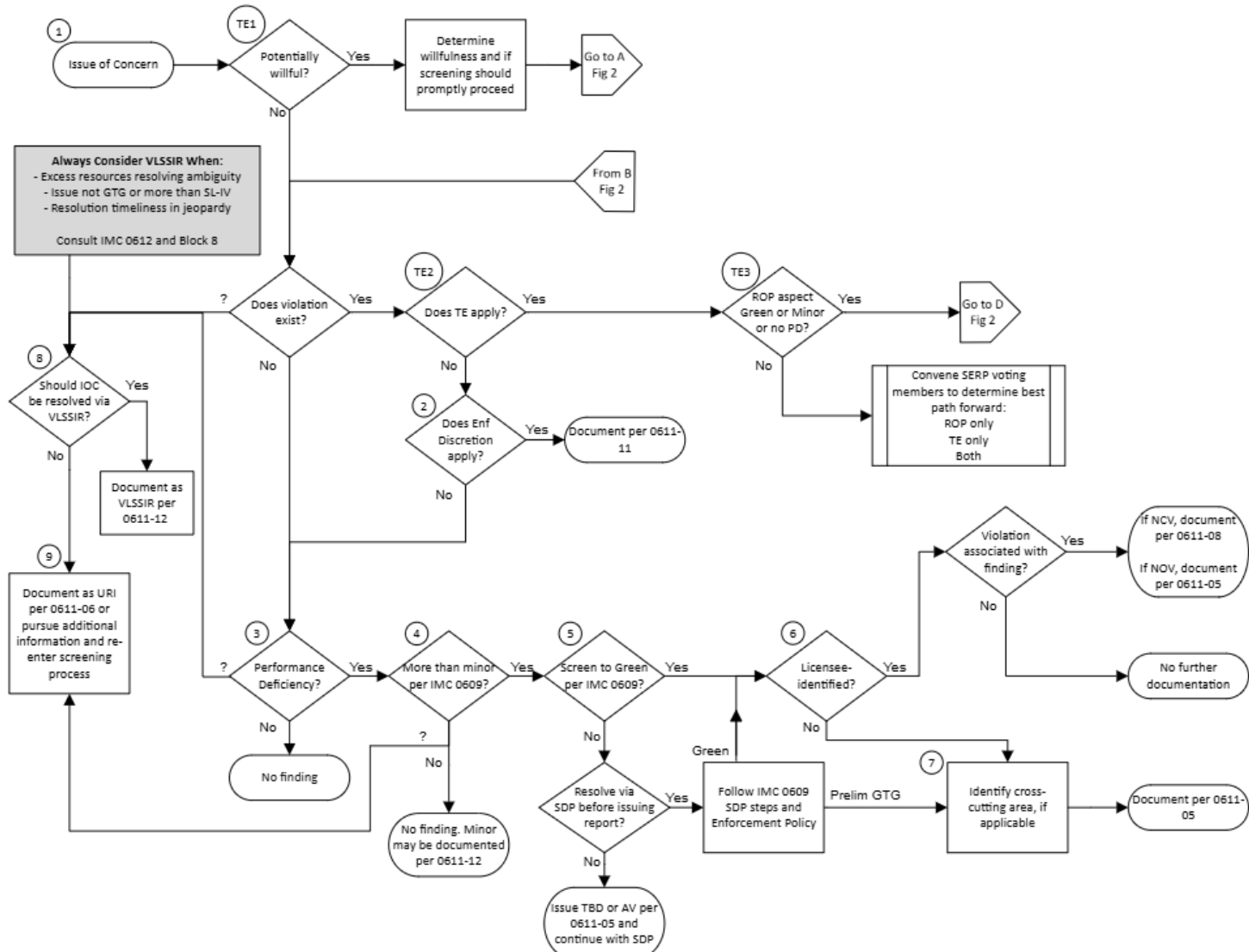
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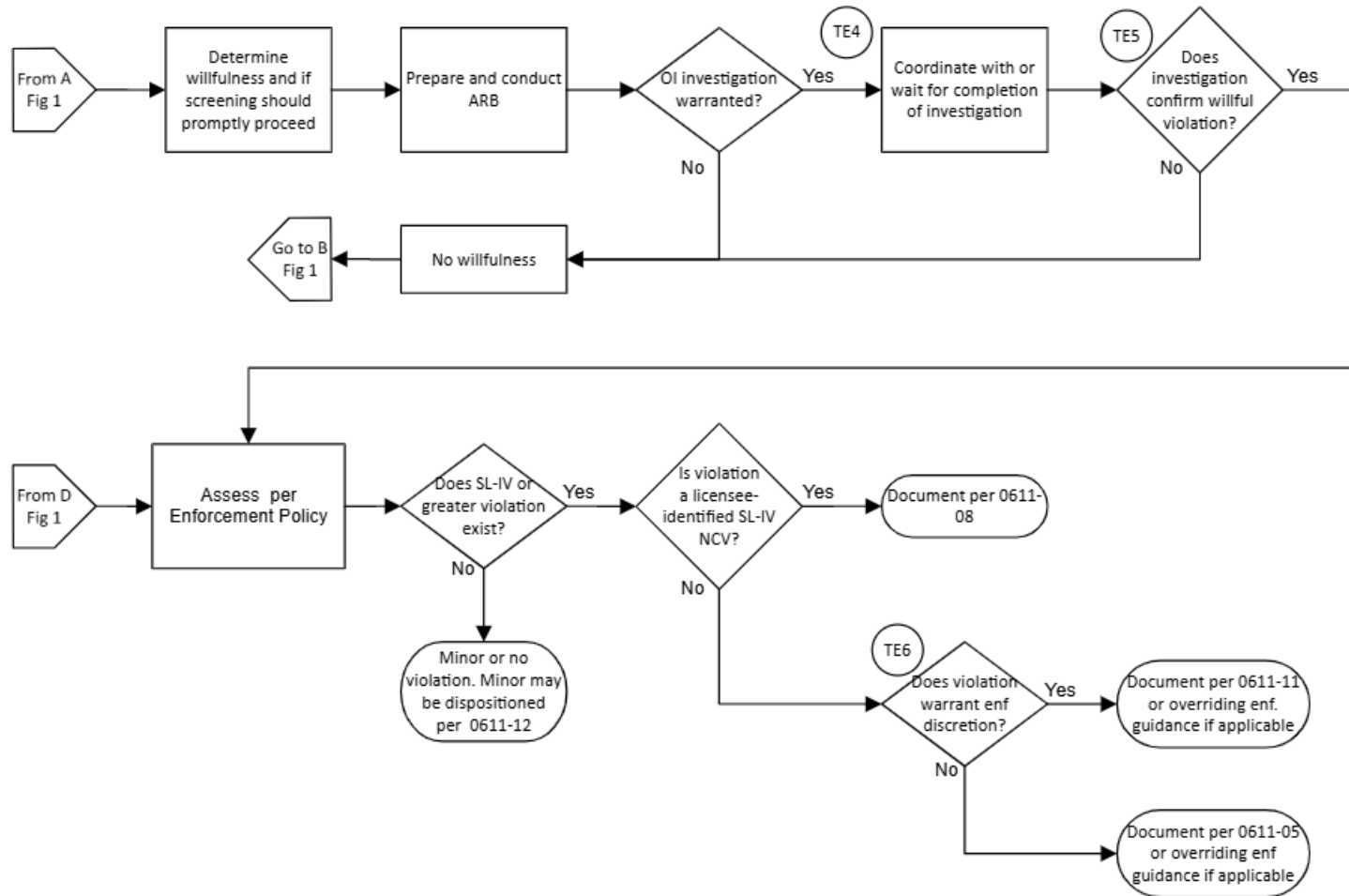
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FIGURE 1: ISSUE SCREENING



Use IMC 0609 Appendix B, “Emergency Preparedness Significance Determination Process” as a supplement to IMC 0612, Appendix B when screening Emergency Preparedness issues.

FIGURE 2: ISSUE SCREENING (TRADITIONAL ENFORCEMENT)



Use IMC 0609 Appendix B, “Emergency Preparedness Significance Determination Process” as a supplement to IMC 0612, Appendix B when screening Emergency Preparedness issues.

Additional Guidance to Clarify Figures

Inspectors will not use the Reactor Oversight Process (ROP) screening process to screen traditional enforcement violations but will use that process to screen their underlying performance deficiencies if any exist. Inspectors will separate traditional enforcement violations from their underlying performance deficiencies and disposition those traditional enforcement violations using the examples and guidance in the Enforcement Manual and Enforcement Policy.

When dispositioning performance deficiencies associated with traditional enforcement violations, **which is typically only considered when the ROP performance deficiency may be greater-than-Green**, inspectors will not consider the traditional enforcement aspect as part of the ROP performance deficiency.

Throughout the inspection and screening process staff shall consider whether the Very Low Safety Significance Issue Resolution (VLSSIR) criteria are met when attempting to resolve open questions involving ambiguity in the licensing basis, design basis, or applicability of regulatory requirements or licensee self-imposed standards. The determination that VLSSIR is an appropriate method for dispositioning an issue of concern may be made more quickly and at a lower level than the guidance discussed herein, which should be viewed as backstop thresholds for VLSSIR engagement and consideration.

GUIDANCE FOR FIGURE 1, "ISSUE SCREENING"

BLOCK 1: ISSUE OF CONCERN IDENTIFIED

An issue of concern is a well-defined observation or collection of observations potentially impacting safety or security which may warrant further inspection, screening, evaluation, or regulatory action. Issues having greater significance and to a lesser extent involving current licensee performance should be prioritized.

For issues of concern with multiple examples, inspectors will screen each example separately.

Issues of concern in the Emergency Preparedness Cornerstone should be routed directly to the emergency preparedness screening and evaluation guidance contained in IMC 0609, Appendix B. Issues of concern in all other Cornerstones or for which the Cornerstone is not certain should proceed through IMC 0612, Appendix B, unless or until it is determined that the issue should be evaluated via the Emergency Preparedness Cornerstone.

An inspector may identify an issue of concern that is neither a regulatory requirement nor an accepted licensee standard which may warrant consideration under the backfit process due to its perceived impact on safety or security. Inspectors identifying such an issue of concern should raise the concern to management and refer to Management Directive (MD) 8.4, "Management of Backfitting, Forward Fitting, Issue Finality, and Information Requests."

BLOCK TE1: IS THERE A POTENTIALLY WILLFUL VIOLATION?

Although inspectors screen issues of concern for indications of potentially willful violations, the determination of willfulness is a legal decision that can only be made by the Office of the General Council (OGC) using facts developed during an investigation conducted by Office of Investigations (OI), normally at the recommendation of the Allegation Review Board (ARB).

See the Enforcement Policy, Enforcement Manual, and Allegation Manual for additional insights involving willfulness. See 10 CFR 50.5 for regulations addressing deliberate misconduct.

BLOCK TE2: DOES TRADITIONAL ENFORCEMENT APPLY?

If any of the following questions can be answered 'yes', the inspector will compare the violation with examples in the Enforcement Policy to determine if the violation rises to severity level (SL) IV or above and thus constitutes a non-minor traditional enforcement violation.

1. Was there a violation that impacted the regulatory process? Examples:
 - Failure to provide complete and accurate information
 - Failure to receive prior NRC approval for changes in licensed activities
 - Failure to notify the NRC of changes in licensed activities
 - Failure to perform 10 CFR 50.59 analyses
 - Reporting failure, etc.

2. Was there a violation that contributed to actual safety consequences? Examples:
 - Actual onsite or offsite releases of radiation exceeding regulatory limits
 - Onsite or offsite radiation exposures exceeding regulatory limits
 - Accidental criticalities
 - Core damage
 - Loss of significant safety barriers
 - Loss of control of radiological material exceeding regulatory limits for public dose
 - **During an actual General Emergency, a licensee's inaccurate protective action recommendation, or lack thereof, directly results in offsite response organizations implementing inappropriate protective actions which are ineffective in providing for the public health and safety**
3. Is there a SL IV or greater violation with no associated performance deficiency or is enforcement discretion being exercised?

Circumstances may arise where enforcement discretion should be considered or exercised to either escalate or mitigate enforcement sanctions or otherwise refrain from taking enforcement action for a particular violation. The Enforcement Policy and Enforcement Manual describe situations where this may apply. Specific circumstances may include:

- Specific cases for which temporary Enforcement Guidance Memoranda prescribes enforcement discretion
- Non-minor violations absent a performance deficiency
- Violations identified during extended shutdowns or work stoppages
- Violations involving old design issues
- Violations identified because of previous enforcement action
- Violations involving certain discrimination issues

Note: Independent spent fuel storage installations (ISFSI), and nuclear materials facilities are not subject to the Significance Determination Process (SDP) and, thus, traditional enforcement will be used for these facilities and their associated license.

BLOCK 2: DOES ENFORCEMENT DISCRETION APPLY?

Violations are considered for enforcement discretion under Enforcement Policy section 3, "Use of Enforcement Discretion" supplemented by guidance in Enforcement Manual Appendix A, "Temporary Enforcement Guidance" or under Enforcement Policy section 9, "Interim Enforcement Policies." Unless specifically authorized by an Enforcement Guidance Memorandum or Interim Enforcement Policy, an enforcement panel is generally required prior to granting enforcement discretion. Severity Level IV non-cited violations are typically not considered for enforcement discretion. Violations receiving enforcement discretion are not assessed under the ROP as performance deficiencies consistent with IMC 0308, Attachment 3.

BLOCK 3: IS THERE A PERFORMANCE DEFICIENCY?

The issue of concern is a performance deficiency if the answer to both of the following questions is “yes”:

- Was the issue of concern the result of the licensee’s failure to meet a requirement or standard? (A standard includes a self imposed standard such as a voluntary initiative or a standard required by regulation)
- Was the cause of the issue of concern reasonably within the licensee’s ability to foresee and correct and should the issue of concern have been prevented?

Notes: (1) The performance deficiency is the proximate cause of the degraded condition and is not **simply** the degraded condition **itself**. To determine this cause, inspectors need not complete a rigorous root-cause evaluation but instead may complete an evaluation based on reasonable inspector assessment and judgment.

(2) Inspectors should define a performance deficiency at the level of deficient performance that directly led to the issue of concern. Organizational weaknesses should not be identified as performance deficiencies but should be considered as the **cross-cutting area (CCA)**. The impact of an organizational weakness could be a performance deficiency.

(3) Enforcement Manual, Part I, section 1.3.5, “Documenting Related Violations,” discusses grouping closely related violations. Considering this guidance, when **a performance deficiency** caused or resulted in multiple violations, it is appropriate for the performance deficiency to be defined at the problem level, thereby creating a relationship between one performance deficiency and many violations.

When evaluating the licensee’s failure to meet a requirement or standard, the inspector should consider the licensee’s intent:

- By definition, the licensee intends to meet regulatory requirements, including license conditions and technical specifications.
- The inspector can generally conclude the licensee intends to meet standards established in current licensing basis documents. **IMC 0326, “Operability Determinations,”** provides insights into what documents may constitute current licensing basis.
- Failure to meet an industry standard constitutes a performance deficiency if the licensee intended to meet that standard. Inspectors may reasonably conclude that standards implemented via licensee procedures or as Nuclear Energy Institute (NEI) initiatives committed to by the industry are standards that the licensee intended to meet.
- The inspector should focus on whether the licensee met regulatory requirements in an acceptable manner rather than whether the licensee met the requirements in a manner specifically approved in a generic communication.

BLOCK 4: IS THE PERFORMANCE DEFICIENCY MORE-THAN-MINOR?

Refer to IMC 0609, Attachment 4, “Initial Characterization of Performance Deficiencies,” to determine the appropriate Cornerstone for the performance deficiency. IMC 0609, Attachment 4, will route the performance deficiency to the relevant appendix to IMC 0609, “Significance Determination Process,” which contains criteria for determining whether the performance deficiency is more-than-Minor. If the performance deficiency screens to Minor, return to this document and proceed via Figure 1.

BLOCK 5: DOES THE FINDING SCREEN TO GREEN?

Refer to IMC 0609, Attachment 4, “Initial Characterization of Performance Deficiencies,” to determine the appropriate Cornerstone for the performance deficiency. IMC 0609, Attachment 4, will route the performance deficiency to the relevant appendix to IMC 0609, “Significance Determination Process,” which contains criteria for determining whether the performance deficiency is a more-than-Minor inspection finding that screens to Green. Once it is determined that the performance deficiency screens as a Green finding, must be evaluated further by the SDP, or is potentially greater-than-Green, return to this document and consult Figure 1. Any finding that cannot be determined to be Green will require a Significance Enforcement Review Panel (SERP).

BLOCK 6: IS THE FINDING LICENSEE-IDENTIFIED?

Consider the definitions in IMC 0612 when determining whether a finding is licensee-identified, NRC-identified, or self-revealing.

BLOCK 7: IDENTIFY APPROPRIATE CROSS-CUTTING AREA(S)

To identify an appropriate cross-cutting **area** for a finding, the inspector will:

- Review applicable causal information related to the finding to identify the cause(s) of the performance deficiency. (To identify causes, inspectors need not perform independent causal evaluations beyond what would be appropriate for the complexity of the issue. For the most-complex issues, inspectors may need to complete informal apparent-cause evaluations.)
- Among those causes, identify the performance characteristic that is either the primary cause of the performance deficiency or the most-significant contributor to it.
- Also, apply additional considerations to determine whether the CCA is reflective of present performance.
- Select the cross-cutting **area** that best reflects the performance characteristic that is the most significant contributor to the finding (i.e., determine which cross-cutting **area** provides the most meaningful insight into why the finding occurred, which may on

occasion closely resemble the finding.) A cross-cutting **area** is a finding characteristic which inversely relates to the reason why the performance deficiency occurred.

Note that:

- Typically, the staff will assign no more than one cross-cutting **area** to a finding. The regional staff may assign more than one cross-cutting **area** when there are unique or complex inspection findings warranting more than one cross-cutting **area**. Confer with the Reactor Assessment Branch Chief (NRR/DRO/IRAB) prior to assigning more than one cross-cutting **area** to a finding.
- For a finding to have multiple examples, the same cross-cutting **area** should be associated with each example, consistent with Enforcement Manual, Part I, Section 1.3.4, "Documenting Multiple Examples of a Violation." (Unless examples have the same cross-cutting **area**, they can't be examples of the same finding.)

BLOCK 8: SHOULD THE ISSUE OF CONCERN BE RESOLVED USING THE VLSSIR PROCESS?

VLSSIR is a Process used to discontinue inspection, screening, and evaluation of an issue involving ambiguity in the licensing basis, design basis, or applicability of regulatory requirements or licensee self-imposed standards in which: (1) the resolution of the issue would require considerable staff effort; and (2) the agency has chosen to not expend further effort to resolve the question because the issue would be no greater than Green under the ROP or SL-IV under the traditional enforcement process, if resolved. VLSSIR is not intended to be used to disposition an issue of concern in which the NRC and licensee simply do not agree, absent some level of ambiguity in NRC's view of the issue. It is important to listen to and consider licensee perspectives and VLSSIR consideration is not intended to undermine that. When determining whether to use VLSSIR, cease further effort on the issue, or continue dispositioning based on resources expended, focus on agency resources expended seeking to understand the issue as opposed to effort expended evaluating and responding to licensee perspectives.

Discontinue issue inspection, screening, or evaluation and document via VLSSIR at any point in the inspection process once it becomes apparent that the resources required to resolve an open issue of concern that would not be greater than Green or SL-IV are not commensurate with the safety or security significance of the issue and would not effectively and efficiently serve the Agency's mission. Consider VLSSIR when it becomes apparent that timeliness goals for resolving very low safety or security significance issues may not be met. Once onsite or virtual direct inspection activities have been completed, dispositioning of open issues of concern shall be revisited every calendar week with the inspection lead's branch chief and division management to determine whether continued dispositioning is within the Agency's interests or if it is more appropriate to use VLSSIR or cease further effort on the issue of concern.

Additionally, IMC 2515, Section 11.07, establishes a 16-hour threshold for headquarters support of an inspection issue at which point division management should be engaged to consider VLSSIR. Very small inspection samples with, for example, 1 or 2 hours of budgeted inspection effort, may warrant consideration of VLSSIR for open issues of concern involving ambiguity sooner.

Either Criterion 1 or 2 below must be met to document an issue via VLSSIR:

Criterion 1: All of the following are met:

- The inspection staff has not been able to conclude that the issue of concern is a violation of regulatory requirements or failure to meet a licensee self-imposed standard, as described in Block 3, after considering any licensee provided supporting information and any relevant information developed during the inspection process.
- The condition surrounding the issue of concern cannot have any potential to be greater than Green (i.e., not greater than very low safety or security significance, if the issue was determined to be a finding evaluated using the SDP screening questions or via a bounding evaluation by an SRA) nor greater than Severity Level IV if the issue was determined to be a violation subject to traditional enforcement.
- The resources required to resolve the question involving ambiguity in the licensing basis, design basis, or applicability of regulatory requirements or licensee self-imposed standards would not effectively and efficiently serve the Agency's mission or it becomes apparent that timeliness goals for resolving very low safety or security significance issues may not be met.

Criterion 2: The issue of concern was evaluated using Office Instruction COM-106, "Technical Assistance Request (TAR) Process" and recommended for no further action because the VLSSIR definition and criteria for use are met.

Cases may arise where clarification of a requirement through generic processes, interim staff guidance, or other appropriate means may be necessary, outside of inspection and assessment, to address broader safety and regulatory concerns.

See the TAR Process for further information how to address current licensing basis questions that do not meet the above criteria.

Open URIs may be assessed using the above criteria to determine whether they should be closed using the VLSSIR process.

BLOCK 9: OPEN OR CLOSE AN URI

Open an Unresolved Item (URI) when an inspection must exit pending receipt of information required to determine one of the following:

- If there is a performance deficiency
- If the performance deficiency is More-than-Minor
- If the issue of concern is a violation

Note: An URI shall not be used to obtain more information in determining the significance of a finding.

Close an URI when any one of the following conditions are met:

- No performance deficiency exists (e.g., issue of concern being evaluated using MD 8.4, the associated violation receives enforcement discretion)

- The performance deficiency is minor
 - The issue of concern was resolved using the VLSSIR process.
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BLOCK TE3: DECISION ON PATH FORWARD

When a traditional enforcement violation is present, the default screening path will be to pursue only the traditional enforcement aspect. Any associated ROP aspect would not be pursued, provided the ROP aspect would be Green or minor. When pursuing only the traditional enforcement aspect, the next step would be to follow transfer gate 'D' to Figure 2 and consult the Enforcement Policy.

In the event an associated ROP aspect is potentially greater-than-Green, SERP voting members will be convened to determine whether to pursue only the traditional enforcement aspect, only the ROP aspect, or both aspects.

Once the SERP voting members make a decision, follow the appropriate screening path(s) in Figures 1 and 2. For traditional enforcement, follow the 'D' transfer gate to Figure 2 and for ROP proceed beginning with Block 3 on Figure 1.

GUIDANCE FOR FIGURE 2, "ISSUE SCREENING (TRADITIONAL ENFORCEMENT)"

BLOCK TE4: COORDINATE WITH OR WAIT FOR COMPLETION OF INVESTIGATION

This block requires enhanced coordination to preclude the possibility of compromising an ongoing investigation by proceeding prematurely with ROP disposition activities, if any, while simultaneously assuring that ROP disposition activities are not delayed inappropriately. This rare scenario should only occur if a SERP decision was made at TE3 to pursue both escalated TE and ROP paths.

BLOCK TE5: DOES INVESTIGATION CONFIRM A WILLFUL VIOLATION?

In accordance with the Enforcement Policy and Enforcement Manual, OI, upon concluding its investigation, will issue a conclusion about willfulness based on the facts collected/developed during the investigation. Using the facts/conclusion above, OGC will make a final determination about willfulness.

BLOCK TE6: DOES THE VIOLATION WARRANT ENFORCEMENT DISCRETION?

For violations involving enforcement discretion, coordinate actions with the Regional or Program Office Enforcement Coordinator. See the Enforcement Policy and Enforcement Manual for additional information.

Some enforcement discretion decisions are made on a case-by-case basis in consultation with the Office of Enforcement, while others may be instituted under a temporary Enforcement Guidance Memorandum or Interim Enforcement Policies.

Attachment 1: Revision History for IMC 0612 Appendix B

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	04/29/2002 CN 02-021	IMC 0612 Appendix B removed from IMC 0612 and made a standalone document. Unable to locate original in ADAMS.	No	
	ML0308004200 2/21/2003 CN 03-006	Editorial changes made to reflect title changes to standard ROP terminology. Appendix B was removed as an attachment to IMC-0612 and was issued as stand alone document.	No	
	ML0316106900 6/20/2003 CN 03-021	Revised to achieve the following: 1. Consistency with IMC-0306. 2. Present information in the order in which the activities will normally be performed in the process of developing and transmitting a reactor inspection report. 3. Remove specific enforcement guidance to ensure consistency between the guidance in 0612 and the Enforcement Policy and Manual. 4. Correct incorrect or conflicting information.	No	
	ML051400254 05/19/2005 CN 05-014	Revised to add Question No. 5 to Minor Questions in section 3 and Question No. 6 to the SDP Questions in section 4 to reflect the new maintenance risk assessment and risk management SDP, IMC 0609, Appendix K, "Maintenance Rule Risk Assessment and Risk Management."	No	
	ML052700266 09/30/2005 CN 05-028	Revised to clarify the definition of a performance deficiency and a functionality of the control room. Also, the auxiliary building attribute was added to the cornerstone and objective section.	No	
	11/01/2006	Revision history reviewed for the last four years.	No	

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML060400499 11/02/2006 CN 06-033	Revised definition of performance deficiency to bring the definition in alignment with the basis for performance deficiency as described in ROP basis document, IMC-0308 attachment 3, "Significance Determination Process Basis Document."	Yes 09/06/2006	ML063000483
	ML071720417 09/20/2007 CN 07-029	Revised flow chart and section 3 guidance to address feedback forms. Corrected formatting error on page B-7.	No	
	ML082310381 12/04/2008 CN 08-034	Revised Guidance and Flow Chart to be consistent with changes to IMC 0612. Updated Cornerstone Objectives and Attributes to be consistent with IMC 0308.	Yes 12/03/2008	ML083220751

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML091590496 12/24/2009 CN 09-032	Rewrite Guidance and Flow Charts to: <ol style="list-style-type: none"> 1. Implement enhanced Traditional Enforcement (TE) integration in ROP 2. Enhance organization and access 3. Incorporate IMC 0305 Cross-Cutting Aspect inspection guidance 4. Address (in part) the following 0612-related ROP Feedback: <ol style="list-style-type: none"> a. 1303 - enhance App E Maintenance Rule (MR) examples, remove MR specifics from App B b. 1355 –enhance Performance Deficiency guidance (e.g. what constitutes a "standard") c. 1362 - enhance MR minor screening guidance (see 1303) d. 1366 - enhance minor screening guidance for improved consistency e. 1398 - improve alignment between 0612 and Enforcement Policy (e.g. minor TE Violations) f. 1418 – enhance minor screening guidance to reduce subjectivity per 2008 Consolidated ROP Internal Self-assessment (CRIS-08) g. 1419 - enhance guidance for differentiating self-revealing vs. NRC- vs. License ID per CRIS-08 h. 1425 - resolve CCA guidance cross-reference errors 5. Consolidate screening guidance from section 0612-05 'Screening Inspection Results,' of IMC 0612-proper into Appendix B screening guidance. 	Yes 12/10/2009 ID Credit Training ML16154A237	ML091480470

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML12080A204 09/07/2012 CN 12-020	Complete Reissue. Simplified guidance. Added enforcement discretion path to traditional enforcement.		ML12205A244 FF 0612B-1398, 1439, 1483, 1496, 1507, 1591, 1679, 1680, 1683, 1700, 1703
	ML17129A624 12/13/17 CN 17-029	Editorial update made to reflect the splitting of IMC 0612 into IMC 0611 for documentation and IMC 0612 for issue screening.		
	ML19247C384 12/12/19 CN 19-039	Revised to address feedback forms, ANO Lessons Learned Recommendation 5, and Columbia DPO-2018-001 Recommendation 1. Provides new guidance for the Very Low Safety Significance Issue Resolution (VLSSIR) process (ref: "Low Safety Significance Issue Resolution Working Group Recommendation" memo to Ho K. Nieh, Director Office of Nuclear Reactor Regulation (ML19260G224))		ML19247C918 0612B-(1433) ML19220A106 (1433) ML19220A108 (1436) ML19220A109 (1564) ML19220A110 (1887) ML19316A002 (1929) ML19311C610 (1934) ML19220A111 (1970) ML19316A003 (1997) ML19220A112 (2014) ML19316A004 (2029) ML19220A113 (2203)
	ML20274A209 12/10/20 CN 20-070	Revised to incorporate some changes in Figure 1 to align with IMC 0611. Added clarifying guidance on the concept of licensee ability to foresee and correct, and the definition of performance deficiency in Block 2. Also modified the enforcement bullet in Block 2.		ML20275A010 FBF 0612B – 2268 ML19220A114 FBF 0612B-2415 ML20345A168

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML21203A356 07/23/21 CN 21-026	Clarified the VLSSIR requirements to align with the TAR process and to address FBF 0612B-2427. Established URI closure criteria.		ML21116A046 FBF 0612B-2427 ML21113A110
	ML22019A175 08/08/22 CN 22-016	Updated the VLSSIR and URI consideration and flowchart to clarify that the presence of traditional enforcement (e.g., impeding the regulatory process) does not preclude VLSSIR and URI documentation. Clarified that violations receiving enforcement discretion are not assessed under the ROP, consistent with IMC 0308 Att 3. Removed guidance that was inconsistent with defining the performance deficiency as the proximate cause of the degraded condition, consistent with IMC 0308 Att 3.	Yes, Completed on 7/7/22	ML22160A571
	ML23219A174 08/09/23 CN 23-022	Aligned Block 2 wording on enforcement panels with the Enforcement Manual. Clarified CCA assignment wording under Block 7 with respect to its relationship to the associated performance deficiency/finding.	N/A	N/A
	ML25086A249 05/28/25 CN 25-015	Updated VLSSIR language to incorporate a revision to VLSSIR applicability to include ambiguity in the applicability of regulatory requirements and additional agency-wide focus on the level of effort spent resolving very low safety significance issues. Updated Figures 1 and 2 to simplify Traditional Enforcement issue screening. Added a Table of Contents and modified/removed shading for readability.	N/A	ML25086A272

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML26098A376 04/30/26 CN 26-015	Incorporated resolution to feedback form 0612B-1859. Revisions made to reflect relocation of more-than-Minor guidance from IMC 0612 to IMC 0609. Removed reference to office instruction LIC-100, which has been sunset. Clarified that issue screening for emergency preparedness cornerstone issues routes directly to EP-specific guidance in IMC 0609 Appendix B. Minor edits to clarify the use of dual path for potentially greater-than-Green ROP issues and revisions to the cross-cutting issues program. 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 via SRM-SECY-26-0014.		ML25274A088 ML25301A230 FBF 1859 ML16165A223