

NRC INSPECTION MANUAL

IRAB

INSPECTION MANUAL CHAPTER 0612

ISSUE SCREENING

Effective Date: 05/18/2026

TABLE OF CONTENTS

0612-01	PURPOSE	1
0612-02	OBJECTIVES.....	1
0612-03	DEFINITIONS	1
03.01	Apparent Violation (AV).....	1
03.02	Cross-Cutting Area (CCA).....	1
03.03	Finding.....	1
03.04	Issue of Concern.....	1
03.05	Licensee-Identified.....	1
03.06	Minor Violation.....	2
03.07	Non-Cited Violation (NCV).....	2
03.08	Notice of Violation (NOV).....	2
03.09	NRC-Identified.....	2
03.10	Observation.....	2
03.11	Pending Significance.....	2
03.12	Performance Deficiency.....	2
03.13	Preliminary Significance.....	2
03.14	Present Performance.....	2
03.15	Regulatory Requirement.....	3
03.16	Standard or Self-Imposed Standard.....	3
03.17	Self-Revealed.....	3
03.18	Severity Level (SL).....	3
03.19	Significance Determination Process (SDP).....	3
03.20	To Be Determined (TBD).....	3
03.21	Traditional Enforcement (TE).....	3
03.22	Unresolved Item (URI).....	3
03.23	Violation.....	4
03.24	Very Low Safety Significance Issue Resolution (VLSSIR).....	4
0612-04	RESPONSIBILITIES AND AUTHORITIES	4
0612-05	ISSUE SCREENING GUIDANCE	5
05.01	Consideration of the Very Low Safety Significance Issue Resolution Process.....	5
05.02	Determination of Minor Versus More-than-Minor.....	5
0612-06	REFERENCES	6
Attachment 1: Revision History for IMC 0612		Att1-1

0612-01 PURPOSE

01.01 Provide requirements for inspection issue screening.

01.02 Ensure that all violations of Nuclear Regulatory Commission (NRC) requirements by power reactor licensees are appropriately dispositioned in accordance with the NRC Enforcement Policy. This includes traditional enforcement violations which cannot be addressed only through the Reactor Oversight Process (ROP).

0612-02 OBJECTIVES

02.01 Screen inspection results to determine if issues warrant documentation in inspection reports.

02.02 Ensure that violations are dispositioned in accordance with the Enforcement Policy and to ensure that performance deficiencies are screened, assessed, and documented in accordance with this IMC.

0612-03 DEFINITIONS

The following terms are applicable for the purposes of screening and documentation:

03.01 Apparent Violation (AV). A non-compliance with a regulatory requirement for which an enforcement decision has not been reached.

Examples include: (a) violations associated with ROP findings having pending or preliminary significance, (b) traditional enforcement violations being considered for escalated enforcement action, (c) violations being considered for enforcement discretion.

03.02 Cross-Cutting Area (CCA). Refer to IMC 0310, "Aspects Within the Cross-Cutting Areas" for the definition.

03.03 Finding. A performance deficiency determined to be **more-than-Minor (MTM)** in accordance with **the issue screening and significance evaluation processes governed by IMC 0612, Appendix B, IMC 0609, Attachment 4, and the IMC 0609 appendices.**

03.04 Issue of Concern. A well-defined observation or collection of observations potentially impacting safety or security which may warrant further inspection, screening, evaluation, or regulatory action.

03.05 Licensee-Identified. Licensee-identified findings and violations are (1) identified as a result of deliberate observation **or good questioning attitude** by licensee personnel; and (2) entered into the licensee corrective action program.

Examples of deliberate observations **and good questioning attitude** that result in licensee-identified findings or violations include (1) those identified during activities such as post maintenance testing, operator rounds, engineering walkdowns, drills, critiques, or audits; and (2) degraded conditions identified during testing which do not result in test failure **or are not within the scope of the test being conducted.**

- 03.06 Minor Violation. A violation associated with a minor performance deficiency or a traditional enforcement violation that is less than Severity Level (SL) IV. All violations, including minor violations, must be corrected. Minor violations are not routinely documented in inspection reports **but the corrective action document(s) for minor violations may be listed as documents reviewed even when a Minor violation is not documented.**
- 03.07 Non-Cited Violation (NCV). A method for dispositioning a SL IV violation or a violation associated with a Green ROP finding that meets the criteria in Section 2.3.2 of the Enforcement Policy.
- 03.08 Notice of Violation (NOV). A written notice setting forth one or more violations of a legally binding requirement (see 10 CFR 2.201, "Notice of Violation").
- 03.09 NRC-Identified. NRC-identified findings or violations are found by NRC inspectors, of which the licensee was not previously aware or had not been previously documented in the licensee's corrective action program. NRC-identified findings or violations also include issues initially identified by the licensee to which the inspector has identified inadequacies in the licensee's characterization or evaluation of the issue of concern.
- 03.10 Observation. A factual detail noted during an inspection.
- 03.11 Pending Significance. A significance characterization assigned to a finding which requires further safety or security significance evaluation to determine a preliminary significance.
- 03.12 Performance Deficiency. The licensee's failure to satisfy one or more regulatory requirements or self-imposed standards where such failure was reasonably foreseeable and preventable. Additional information is provided in block 2 of Appendix B of this IMC.
- 03.13 Preliminary Significance. A significance characterization assigned to a finding that has received a preliminary significance determination from the Significance Enforcement Review Panel (SERP) and was determined to be preliminarily White, Yellow, Red, or Greater than Green.
- 03.14 Present Performance. The potential **cross-cutting area** is reflective of present performance if the performance deficiency (not the event or condition resulting from the performance deficiency) occurred recently, nominally within the last 3 years. When appropriate, apply additional considerations to determine whether the **cross-cutting area** is reflective of present performance.
- a. If the performance deficiency occurred more than 3 years ago, but the performance characteristic has not been corrected or eliminated, the inspector can conclude that the **cross-cutting area** is reflective of present performance.
 - b. If the performance deficiency occurred within the last 3 years, but the performance characteristic has since been corrected or eliminated, the inspector can conclude that the **cross-cutting area** is not reflective of present performance.

Note: Corrected or eliminated **cross-cutting areas** means the licensee had taken actions prior to the discovery of the performance deficiency and because of these actions, a similar issue would not likely occur now. For example, the licensee initiates actions to

improve the quality of calculations; however, 2 months later, the inspector identifies problems with a calculation which had been issued a year before this effort. If the inspector believes the licensee's actions to improve calculations would have prevented this recently identified issue, the inspectors can conclude the performance deficiency is not reflective of current performance.

- 03.15 Regulatory Requirement. A legally binding obligation such as a statute, regulation, license condition, technical specification, or order that is enforceable by the NRC.
- 03.16 Standard or Self-Imposed Standard. A licensee-established expectation that does not constitute a regulatory requirement.
- 03.17 Self-Revealed. Self-revealed findings or violations are those identified as a result of a condition that (1) become apparent through a readily detectable degradation in material condition, capability, or functionality of equipment or plant operations; and (2) does not meet the definition of licensee-identified or NRC-identified.

Examples of self-revealed findings or violations include those revealed through: unplanned reactor trips and secondary plant transients; obvious equipment and piping failures; failed on demand testing; valid plant or electronic dosimeter alarms; identification of large quantities of fluids in areas where one would not normally expect such a condition.

- 03.18 Severity Level (SL). The significance of a violation evaluated under traditional enforcement.
- 03.19 Significance Determination Process (SDP). The process described by IMC 0609 and associated appendices that is applied to an inspection finding to determine its safety or security significance as either Green (very low), White (low), Yellow (**moderate**), or Red (high). **The determination of whether a performance deficiency is MTM is also made within the SDP documents.**
- 03.20 To Be Determined (TBD). A significance characterization assigned to a finding with pending or preliminary significance. The TBD characterization will apply until the final significance is documented in an inspection report or final determination letter.
- 03.21 Traditional Enforcement (TE). An Enforcement Policy process used to disposition violations of NRC requirements that are not dispositioned through the ROP SDP. Violations receiving traditional enforcement are assigned a Severity Level and may include the imposition of a civil penalty as appropriate. Traditional enforcement is applied to violations associated with (a) actual consequences, (b) willfulness, and (c) impeding the regulatory process. Additionally, traditional enforcement is used to disposition violations receiving enforcement discretion or violations without a performance deficiency. Independent spent fuel storage installations (ISFSI), and nuclear materials facilities are not subject to the SDP and, thus, traditional enforcement will be used for these facilities.
- 03.22 Unresolved Item (URI). An issue of concern associated with inspection activity which requires more information to determine if: (a) a performance deficiency exists, (b) the performance deficiency is MTM, or (c) the issue of concern potentially constitutes a violation.

- 03.23 Violation. The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification. Violations can be non-cited, cited, escalated or dispositioned using enforcement discretion.
- 03.24 Very Low Safety Significance Issue Resolution (VLSSIR). A process used to discontinue inspection 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.

0612-04 RESPONSIBILITIES AND AUTHORITIES

- 04.01 General Responsibilities. Each inspection of a reactor facility must be properly characterized.
- 04.02 Inspectors. Ensure that inspection results are properly characterized and documented in accordance with NRC guidance. Ensure branch chiefs are aware of the status of questions and issues during an inspection involving ambiguity that may not be easily resolved, and consider VLSSIR when appropriate.
- 04.03 Division Directors, Branch Chiefs, and Direct Supervisors. Review each inspection report to ensure it is consistent with the directives provided in this IMC.

Ensure that inspection findings, determinations, and actions are consistent with NRC policies, directions, and technical requirements. For example, ensure that screening and significance determinations documented in the inspection report are in accordance with Appendix B, "Issue Screening Directions," of this IMC, IMC 0609, "Significance Determination Process," and the Enforcement Policy, as applicable.

Ensure that violations are addressed in accordance with the Enforcement Policy and the Enforcement Manual.

Ensure that VLSSIR is considered when appropriate and prior to expending excess resources on unresolved inspection issues involving ambiguity in the design basis, licensing basis, or applicability of regulatory requirements or licensee self-imposed standards. This includes a weekly review with division management of unresolved inspection issues for consideration of the VLSSIR process once direct inspection has concluded.

- 04.04 Division of Reactor Oversight – Reactor Assessment Branch.
- a. Provide interpretations and support for information contained in this IMC.
 - b. Facilitate resolution of identified gaps in IMC directions and guidance.

05.01 Consideration of the Very Low Safety Significance Issue Resolution Process

Consideration of VLSSIR shall occur any time an issue of concern involving ambiguity in the licensing basis, design basis, or applicability of regulatory requirements or licensee self-imposed standards is not efficiently resolved and would not be greater than Green or more than SL-IV if resolved. Staff should also consider VLSSIR when it becomes apparent that timeliness goals may not be met for resolving issues not greater than very low safety or security significance or SL-IV. Consideration of VLSSIR should occur during an inspection as well as after, as issues that meet the criteria for VLSSIR consideration may arise during an inspection, and excessive effort could be expended during the inspection absent timely resource considerations. Inspectors shall ensure their branch chief is aware of the status of questions and issues during an inspection involving ambiguity that may not be easily resolved and consider VLSSIR when appropriate. Following the completion of pre-scheduled direct inspection effort, the dispositioning of any open inspection issues that meet the intent of VLSSIR should be evaluated with the branch chief and division management weekly to determine whether continued dispositioning, VLSSIR, or some other outcome, such as ceasing effort on the issue, is in the best interest of the Agency and the application of its resources.

A predetermined level of effort need not be expended prior to consideration of VLSSIR and a recommendation to use VLSSIR may be made both sooner and at a lower level than specified. The weekly review of open inspection issues should be seen as a backstop to ensure excessive effort is not spent before an informed decision on resource application is made. Similarly, a backstop 16-hour threshold for branch chief or division director engagement is established in IMC 2515, Section 11.07, pertaining to headquarters support of inspection questions. Some inspection samples are budgeted for a small level of effort, on the order of 1 or 2 hours of direct inspection. For small samples like this, the threshold in IMC 2515 and the weekly review may be seen as disproportionate to the level of inspection effort, and it may be more appropriate for VLSSIR consideration sooner.

The consideration of whether to use VLSSIR should include, though is not limited to, whether the issue of concern is close to being resolved, whether there is some Agency interest in continuing to pursue the issue of concern, and how Agency resources have been used to date in attempting to resolve the issue. 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 this guidance 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.

05.02 Determination of Minor Versus More-than-Minor

The minor–MTM determination was previously located within IMC 0612 but has been relocated to IMC 0609 as part of an ROP Baseline Inspection Program revision effort completed in response to Section 507 of the ADVANCE Act. With this relocation came the elimination of the existing more-than-Minor questions and the accompanying examples in IMC 0612, Appendix E. Additionally, issue screening guidance specific to

the Emergency Preparedness Cornerstone contained in IMC 0612, Appendix G, was revised and relocated to IMC 0609, Appendix B. The overarching intent behind these changes was to reduce the degree of subjectivity and judgment necessary for the determination of whether a performance deficiency is more-than-Minor.

Restoring compliance is required for all violations (Minor or MTM).

0612-06 REFERENCES

IMC 0310, "Aspects Within the Cross Cutting Areas"

IMC 0609, "Significance Determination Process"

END

APPENDICES

Appendix B: Issue Screening Directions

Attachment 1: Revision History for IMC 0612

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)
	01/06/00 CN 00-021	Initial issue of IMC 0610*		
	02/27/01 CN 01-005	IMC 0610* was revised to incorporate revisions to Physical Protection Group Two Questions, in concert with issuance of the interim Physical Protection SDP. Also minor revisions were added to: address treatment of third party reviews, clarify guidance on writing inspection summaries, provide several examples of maintenance findings, and make several administrative revisions.		
N/A	ML021280215 04/29/02 CN 02-021	Initial issue of IMC 0612. Revised from IMC 0610* to address revised documentation requirements of the revised ROP. This revision changed the manner in which findings are documented, deleted "no color" findings and the requirements to add licensee identified violations to the Plant Issue Matrix. Other Major changes involved re formatting several sections for clarity; provided a sample inspection report (to be issued separately); re structured and revised the thresholds for documentation (Appendix B); provided numerous new examples of minor violations in Appendix E; and provided a revised format for documenting findings.	None	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	ML031610632 06/20/03 CN 03-021	IMC 0612 Power Reactor Inspection Reports main body, app appendices and exhibits were revised to achieve the following: 1. Consistency with IMC 0306 (Information Technology Support for the Reactor Oversight Process) 2. Presented information in the order in which the activities will normally be performed in the process of developing and transmitting a reactor inspection report. 3. Removed specific enforcement guidance to ensure consistency between the guidance in IMC 0612 and the Enforcement Policy and Enforcement Manual. 4. Corrected incorrect or conflicting information.	None	N/A
N/A	ML040150518 01/14/04 CN 04-001	Changed the inspection report timeliness to 45 calendar days for most inspection reports, including Special Inspections.	None	N/A
N/A	ML052700137 09/30/05 CN 05-028	Revised to clarify definitions for NRC identified, self revealing and licensee identified; to provide additional guidance on how to document cross cutting issues; to improve guidance on LER closure; to update the new report timeliness requirement; and to reflect changes made to the document based on inspector feedback.	Yes but not prior to issuance	N/A
	02/10/06	Revision history reviewed for the last four years.		

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	ML061300434 06/22/06 CN 06-015	Revised to provide additional guidance and requirements for documenting cross-cutting aspects of inspection findings and to provide guidance on inspection report approval requirements when resolution to unresolved items are based on discussions between inspector(s) and NRR technical staff(s). Enhancing the ROP to more fully address safety culture (SRM 04-0111). Commitment tracking added to IMC 0612 in connection with relocating guidance specific to documenting crosscutting attributes (CCAs) in inspection reports from IMC 0305 to IMC 0612.	Yes 07/01/06	ML061510135
N/A	ML063000257 11/02/06 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 09/06/06	ML063000483
N/A	ML070720191 09/20/07 CN 07-029	IMC 0612 has been revised to add guidance on NRC use of INPO documents and on cover letters for security inspections. Also enhanced guidance on NCVs and SCAQs.	None	ML071560246
N/A	ML082270500 12/04/08 CN 08-034	IMC 0612 has undergone a major re-write to incorporate numerous feedback forms and to add additional guidance for documenting inspection findings.	Yes but not prior to issuance	ML083220722

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)
	ML091590492 04/30/10 CN 10-013	<p>Support changes to IMC 0612 App B to Enhance Integration of ROP with traditional enforcement and consolidation of screening guidance to App B.</p> <p>Recognize creation of IMC 0310 and relocate guidance specific to screening and documenting cross-cutting attributes (CCAs) from IMC 0305 to IMC 0612 App B and IMC 0612, respectively.</p> <p>Address (in part) Feedback Forms 0612-1304, -1352, 1355, -1359, -1365, -1393, -1403, -1410, -1411, -1418, -1419, -1420, -1437, and -1451 associated with documentation of apparent violations, screening analysis, self-imposed standards, SUNSI, cross-cutting finding attributes, findings involving enforcement discretion, screening of minor performance deficiencies, definition/glossary topics, establishing an appropriate level-of-guidance, inclusion of appropriate external references.</p> <p>Consolidate all screening guidance from Section 0612-05 'Screening Inspection Results,' into Appendix B screening guidance.</p> <p>Enhance document usefulness through enhanced use of hyperlinked content.</p>	Yes but not prior to issuance	ML091480470

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)
	ML12058A229 07/10/12 CN 12-014	This revision is a complete reissue which improves the integration of traditional enforcement into the ROP. Significant changes include: Clarified purpose of IMC, revised definitions (present performance, issue of concern, pending significance, preliminarily significance), clarified guidance for documenting traditional enforcement licensee identified violations, added additional guidance to direct the documentation of traditional enforcement violations and associated findings in a combined write-up, corrected numerous terminology issues, enhanced and clarified the documentation requirements for CCAs, redefined present performance as it applies to CCA screening, removed guidance related to photography and SUNSI that is redundant to IMC 0620, and added additional guidance on documenting licensee-identified violations.	None	ML12128A372 Closed FF: 0612-1352, 1434, 1437, 1469, 1490, 1491, 1492, 1493, 1494, 1495, 1497, 1498, 1499, 1502, 1508, 1509, 1528, 1533, 1552, 1559, 1565, 1566, 1567, 1569, 1572, 1588, 1592, 1595, 1596, 1621, 1628, 1669, 1672, 1681, 1697, 1717, 1766
	ML12244A483 01/24/13 CN 13-003	Added requirement to add statement indicating crosscutting aspects assigned to licensee-identified pending or preliminary findings are conditional on non-Green SDP results. Added additional guidance related to documenting findings with pending significance. Added guidance related to reissuing inspection reports. Added note to present performance definition. Revised wording for NCV treatment under Section 6.03b8(a) to conform with Section 2.3.2 of the Enforcement Policy. Added requirement to use plain writing in inspection reports. Added definition for Observation which was inadvertently removed during the last revision.	None	ML12293A326 Closed FF: 0612-1802 & 1807

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)
	ML13058A316 05/06/16 CN 16-012	<ul style="list-style-type: none"> • Clarified licensee-identified, self-revealed, and NRC identified definitions. Added “failed on demand testing” to self-revealed examples. • Added direction on how to document multiple examples of the same finding. • Added a requirement to document when the violation occurred and how long it existed for Section 40A7 NCVs. • Clarified definition of performance deficiency (application or meaning not changed see IMC 0308 Att 3 for basis). • Aligned finding summary and 4 part write-up requirements to eliminate inconsistencies. • Specified existing requirement to document performance deficiency screening when documenting a TE violation without a finding. • Removed replicative cover letter directions already included in IMC 0612 Exhibit 4. • Enhanced direction for amending inspection reports. • Added direction for retaining proprietary information. • Added direction not to communicate regulatory determinations or actions that have not been established in accordance with applicable processes. • Removed requirement to list more than six documents reviewed in a sample in the report attachment. 	None	<p>ML15229A315</p> <p>Closed FF: 06121530, 1555, 1684, 1900, 1917, 1954, & 2152</p> <p>April 2015 DDCM Action Items 25 & 26</p>
N/A	ML17122A246 05/03/17 CN 17-009	Created IMC 0611 to separate power reactor inspection reports from issue screening. No other changes were made to IMC 0612.	None	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)
	ML19214A243 12/12/19 CN 19-039	Revised to address open feedback forms and OIG 16-A-21 Recommendation 2.		ML19217A135 FBFs (0612B): ML19220A106 (1433) ML19220A108 (1436) ML19220A109 (1564) ML19220A110 (1887) ML19220A111 (1970) FBFs (0612E) ML19226A027 (1366) ML19226A029 (1420) ML19226A043 (1931)
N/A	ML23067A031 08/09/23 CN 23-022	Revised VLSSIR definition to align with the agreed to NRC standard definition found in the NMSS VLSSIR working group report (ML22353A599). Considered editorial.		None
	ML25086A248 05/28/25 CN 25-015	Updated VLSSIR definition and added descriptive VLSSIR text to Section 5 as part of an overall effort to revise the applicability of VLSSIR to cover ambiguity in applicability of regulatory requirements and enhanced consideration of resources spent on very low safety significance issues.	N/A	ML25086A273

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)
	ML26098A377 04/30/26 CN 26-015	Revisions made in support of relocating more-than-Minor guidance from IMC 0612 to IMC 0609. 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