

Reactor Oversight Process Whitepaper – Proposed Improvements to the Classification of Licensee-Identified & Self-Revealed Findings & Violations

Prepared by the Nuclear Energy Institute
May 2026

Acknowledgements

NEI acknowledges the assistance of the ROP Task Force during the development of this white paper.

Prepared by: Tim Riti

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Executive Summary

During the July 17, 2024, ROP public meeting, “NEI and other industry representatives expressed that they felt the NRC’s definitions and application of licensee-identified and self-revealed findings may not align with their own definitions and applications of self-identified. Also, that the examples and definitions in IMC 0612 may not closely align with the definitions in the NRC enforcement guidance. They expressed that industry strongly encourages self-identification of issues and offered that the NRC consider its existing definitions to ensure enough credit is offered for licensee self-identification.”¹

Following the ADVANCE Act of 2024 being signed into law on July 9, 2024, NEI submitted a letter² to the NRC on October 28, 2024, outlining improvements to licensing and oversight programs. Attachment 2 of the letter focused on ADVANCE Act Section 507, Improving Oversight and Inspection Programs, and included a recommendation to redefine the terms “self-revealing” and “licensee-identified” to adopt definitions that credit positive licensee behaviors, including questioning attitude and proactive identification of issues. The letter highlighted examples where licensees were not credited for identification, including proactive measures taken to establish early warning alarm setpoints on electronic dosimetry to provide advance notice of a potential issue. Current inspection guidance would classify that condition as “self-revealed.”³

We were pleased to see the following NRC staff recommendation & notification to the Commission in SECY-25-0045, Recommendations for Revising the Reactor Oversight Process, intended to recognize positive industry behaviors associated with issue identification.

1. Revise guidance pertaining to the definition of “licensee-identified” allowing staff to grant identification credit for findings resulting from a good questioning attitude by plant staff. This was a Commission notification item included in IMC-0612, Issue Screening, effective 5/18/2026.
2. Revise treatment of licensee-identified White findings such that they would not count as an Action Matrix input thus would further encourage licensees to identify and rapidly resolve issues that affect safety systems before they may be required to operate in response to an actual event. This recommendation was approved by the Commission in SRM-SECY-25-0045 on January 26, 2026.

The Commission’s decision in SRM-SECY-25-0045 reflects a targeted policy change focused on the regulatory treatment of White findings identified through licensee programs. Although the Commission did not direct wholesale revision of ROP identification categories, its decision to differentiate regulatory consequences based on identification source requires the existing definitions to be applied consistently with the policy change. In particular, the NRC staff must consider whether current definitions of “licensee-identified” and “self-revealed” appropriately distinguish between passive discovery and issues identified as a direct result of deliberate licensee monitoring and assessment programs.

Without that clarification, and the limited changes made only to the definition of licensee-identified in IMC-0612, certain issues identified through structured licensee programs may continue to be

¹ Summary of the ROP Bi-Monthly Public Meeting held on July 17, 2024, dated August 6, 2024. ([ML24213A314](#))

² NEI Letter dated October 28, 2024, “NEI Input in Improvements to Licensing and Oversight Programs.” ([ML24302A311](#))

³ IMC-0612, Issue Screening, 03.17, Self-Revealed. Effective Date: 5/18/2026. ([ML26098A377](#))

categorized in a manner that does not reflect the intent of the policy change approved for White findings or how proactive licensee actions identify issues before being self-revealed.

To resolve this, we recommend the NRC to further revise the definition of licensee-identified and revise the definition of self-revealed including the associated examples in IMC-0612. Specifically, the definition of licensee-identified should be broadened to explicitly recognize modern, program-enabled detection methods, while the definition of self-revealed should be recalibrated to focus on genuinely passive or unforeseeable events. Together, these changes will improve clarity, consistency, and incentive alignment, while maintaining appropriate regulatory rigor and NRC oversight.

A side-by-side comparison of the current definitions from IMC 0612, effective 05/18/26, and proposed changes are provided in Table 1.

1. Historical Basis and Evolution of Licensee-Identified and Self-Revealed Definitions

Under early ROP guidance (e.g., IMC-0612 revisions issued in the early 2000s), the distinction between licensee-identified and self-revealing findings was based on licensee intent and program scope. Back then, findings identified through licensee programs specifically designed to detect a condition (e.g., surveillances, testing, programmatic checks) were generally treated as licensee-identified and conditions discovered incidentally or outside the scope of the applicable licensee program were more likely to be characterized as self-revealing. This approach closely paralleled the NRC Enforcement Policy, which emphasizes the degree of licensee initiative and licensee established monitoring when determining identification credit, even in cases involving events.

Over time, IMC-0612 evolved to place increasing emphasis on whether a condition became apparent through “readily detectable degradation” once it existed, rather than on the mechanism or intent that enabled its detection. Beginning around 2005, NRC inspection guidance incrementally shifted and expanded the self-revealing definition toward a more event-based and objectivity-driven construct. The revised self-revealing definitions emphasized whether a condition was “self-evident,” required “no active and deliberate observation,” and became apparent through “readily detectable degradation” in equipment, processes, or operations. Expanding the definition of self-revealing reduced the credit given to licensees for self-monitoring programs and self-identified issues. Public NRC documents from this period (e.g., baseline inspection program effectiveness reviews from 2005 to 2013) emphasize predictability, clarity, and efficiency but do not articulate an explicit policy decision to narrow recognition of licensee initiative or self-monitoring behaviors.

By 2016 and continuing through the current IMC-0612 definition, self-revealed findings are no longer defined by passive discovery alone. These findings were expanded to include conditions that become apparent through a readily detectable degradation in material condition, capability, or functionality of equipment or plant operations, which include 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. While the staff recognized the benefits of granting licensees identification credit for findings resulting from a good questioning attitude as described in SECY-25-0045, there is more opportunity to improve the definition and how it relates to self-revealed conditions.

This evolution has resulted in a gradual divergence between the ROP’s emphasis on detectability and visibility and the Enforcement Policy’s emphasis on licensee intent, initiative, and self-monitoring. This divergence has become materially important now that SECY-25-0045 assigns regulatory significance to whether a White finding is licensee-identified.

2. Insights on Current Definitions

Under the recently revised IMC-0612 guidance effective 5/18/2026, *“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.”*

By contrast, self-revealed findings and 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.”*

Two structural features of these definitions are key. First, licensee-identified is affirmative and narrowly scoped to certain forms of deliberate observation and it’s unclear how inspectors will assess a good questioning attitude. Second, self-revealed operates in part as a residual category capturing any condition that does not otherwise qualify while also including examples that are commonly detected only because licensees deliberately deploy instrumentation, alarms, testing programs, and monitoring thresholds.

In a modern operating environment, where licensees rely heavily on engineered monitoring systems, alarmed instrumentation, condition-based maintenance, this structure increasingly classifies program-enabled and technology-enabled discoveries as self-revealing even when those discoveries exist only because the licensee deliberately implemented systems to detect early degradation and was actively looking for problems.

3. SECY-25-0045: Policy Change and Conflict with Current Definitions

SECY-25-0045 and SRM-SECY-25-0045 reflect the NRC staff and Commission’s intent to better differentiate between NRC-driven plant performance where NRC identification is required and performance where licensee programs successfully identify and correct issues. Specifically, the Commission approved not counting licensee-identified White findings as Action Matrix inputs but retained a modified NRC follow-up inspection for these findings. The Commission also directed staff to clearly define what constitutes a licensee identified White finding.

The Commission direction cannot be fully realized under the current IMC 0612 definitions. As long as self-revealed continues to include outcomes of deliberate licensee self-monitoring, such as early-alarm actuation, detection via required instrumentation, or failures identified during structured testing, revising licensee-identified alone will have limited effect. The current framework risks denying identification credit to precisely the behaviors the Commission seeks to incentivize, weakening the policy signal to licensee management and the workforce.

4. Recommended Paired Revision of the Definitions

A coordinated revision of both definitions would better align the ROP with Commission intent, the Enforcement Policy, and modern operational practices to better recognize positive industry behaviors associated with issue identification.

NRC staff should pursue a paired revision of the licensee-identified and self-revealed definitions in IMC 0612. This is necessary because the current self-revealed definition encompasses outcomes that are the direct result of deliberate licensee self-monitoring. The following proposals describe explicit, bounded changes that would realign the definitions with the Commissions intent while preserving regulatory rigor.

A. Explicitly broaden licensee-identified definition to include licensee monitoring detection

Identification credit should be based on whether the licensee deliberately created the conditions that resulted in discovery of the problem. This includes events or issues identified through deliberate, licensee-established self-monitoring mechanisms such as proactive use of instrumentation and alarms, periodic testing, and structured self-assessment activities when the adverse condition is recognized and entered into the corrective action program (CAP).

This change does not redefine licensee-identified as “anything the licensee notices.” Rather, it focuses the definition on crediting how the licensee becomes aware of an issue through intentionally deployed systems and processes to detect degradation early. A licensee monitoring program intentionally establishes the activity to detect problems (e.g., tests, alarms, trending, audits) whereby discovery is not incidental; the activity follows defined methods, procedures, and acceptance criteria; the licensee understands an adverse result indicates a condition requiring evaluation; and unsatisfactory results are entered into CAP and addressed under formal processes.

Illustrative examples of expanded licensee-identified treatment

Radiation protection monitoring (dosimeter alarms)

Under current guidance, valid electronic dosimeter alarms are explicitly listed as self-revealed. Under a revised framework, dosimeter alarms should be treated as licensee-identified when the alarm results from the licensee’s deliberate self-monitoring program. The licensee selected, issued, calibrated, and required the use of the device, established alarm setpoints, trained workers on response expectations, and uses the alarm as an early-detection tool for changing radiological conditions. In this context, the alarm is not a passive indication; it is the intended output of an active self-monitoring system. Accordingly, if an ineffective program barrier or inappropriate radiation worker practice is identified because a worker’s dosimeter alarms and the licensee promptly evaluates and enters the issue into CAP it should be classified as licensee-identified. The cause of the dosimeter alarm does not change the identification source when it is the mechanism that first surfaced the condition. If the underlying cause is later determined to involve a self-revealing equipment failure, the attribution principles in the preceding section apply: identification is determined at the point the condition was first recognized, and a subsequent determination of root cause does not change the original identification source.

Instrumentation and control alarms

Plant alarms and indications that alert operators to degrading conditions should be treated similarly when they result from licensee-designed monitoring. For example, an unexpected rise in temperature, pressure, flow, radiation, or leakage identified by installed instrumentation, and recognized and evaluated by the licensee, would qualify as licensee-identified when the alarm or indication exists because the licensee intentionally monitors that parameter for early warning. Examples include, developing seal leakage, abnormal chemistry trends, or emerging equipment degradation identified through routine alarm response and trending would be eligible for licensee-identified credit.

Testing and surveillance outcomes

IMC 0612 appropriately treats degraded conditions identified during testing that do not result in test failure as licensee-identified, recognizing the value of deliberate licensee testing programs in identifying emerging issues. This principle could be clarified to encompass cases where testing reveals degradation and the test procedure does not require a failure or unsatisfactory

determination for the condition observed. Many test procedures establish tiered dispositioning frameworks that distinguish between conditions requiring test failure (e.g., mandatory stop-test criteria) and conditions requiring documentation or notification only. Where a test procedure routes an observed condition to documentation or notification rather than a failure determination, the condition is a degraded condition identified during testing that did not result in test failure, regardless of whether individual parameter readings are outside monitoring ranges. In contrast, conditions first identified because the test procedure requires a failure or unsatisfactory determination for the condition observed, the safety function cannot be performed, or an on-demand failure occurs would continue to be treated as self-revealed. Additionally, adverse trends identified during a surveillance where acceptance criteria are still met and the test is terminated or adjusted at licensee discretion would be treated as licensee-identified.

Licensee-identified credit for testing is based on the testing activity, not on the scope of the maintenance or work activity that initiated the test. The IMC 0612 definition lists "post maintenance testing" alongside "operator rounds, engineering walkdowns, drills, critiques, or audits" as examples of deliberate observation, none of which are limited to a predefined scope. A degraded condition identified during operator rounds receives licensee-identified credit regardless of whether the operator was specifically looking for that condition. The same principle applies to post maintenance testing (PMT): a condition identified during PMT receives credit regardless of whether the condition is related to the maintenance performed or the components worked on, provided the condition is recognized and entered into CAP.

Self-assessments and internal reviews

Issues identified through self-assessments, effectiveness reviews, benchmarking, or internal audits, including those conducted in anticipation of known inspection focus areas, should be credited as licensee-identified when the issue is identified through the licensee's own processes and entered into the corrective action program prior to NRC identification of the same specific deficiency. This credits licensee initiative while preserving NRC authority to independently assess the adequacy, scope, and timeliness of the response. Accordingly, any issue found during a self-assessment performed ahead of an NRC inspection would be classified as licensee-identified if entered into CAP before the NRC identifies the deficiency, even if the NRC has already indicated inspection scope. Licensees that chose not to perform proactive self-assessment activities prior to NRC inspections would not get credit for issues identified by NRC inspectors during the inspection. Consistent with NRC enforcement guidance, licensee identification credit would not normally apply in cases where specific NRC concerns prompted licensee attention to an issue that was not already being actively pursued.

B. Refocus self-revealed definition on genuinely passive discovery

Revise the definition and examples of self-revealed to better distinguish passive discovery from issues identified through deliberate licensee monitoring or assessment. Self-revealed findings would continue to include conditions that become apparent primarily through loss of capability, equipment failure, or operational impact, where the timing of discovery is not meaningfully influenced by licensee initiative.

This preserves the original purpose of self-revealed while providing improved consistency at the boundary between self-revealed and licensee-identified findings in cases involving trend based monitoring or early detection programs.

Illustrative examples of issues that would remain appropriately self-revealed

- Structural or material failures that manifest suddenly without reliance on monitoring thresholds or alarms (e.g., obvious piping rupture with flooding).
- Unprompted equipment failure where no monitoring or test was required or expected at the time of discovery.
- Events where the licensee neither designed nor relied upon a monitoring mechanism to detect the condition and the discovery was unavoidable.

By applying the changes above, self-revealed would exclude predictable outcomes of licensee monitoring programs and be reserved for passive revelations consistent with the original ROP construct and the Enforcement Policy.

C. Clarify attribution rules to reduce subjectivity and disputes

Augment IMC 0612 with objective attribution principles that reduce reliance on subjective judgments about “ease of discovery” and instead focus on licensee intent and action. Identification classification should be based on the mechanism that actually surfaced the condition, not on what might have occurred had the condition remained undiscovered. Attribution should therefore be determined at the point the condition was first recognized and entered into CAP, and a subsequent self-revealed event that results from the same condition does not change the original identification source; it may, however, affect the issue’s significance and the evaluation of corrective action timeliness. Key clarification concepts could include:

- If the licensee identifies and documents an issue in CAP before the NRC identifies the same specific deficiency, the issue is presumptively licensee-identified unless there is evidence of mischaracterization or delayed recognition.
- The presence of an NRC inspection, announced inspection scope, or generic industry issue does not preclude licensee-identified classification when the licensee’s own programs detected the condition.
- Use of industry peers, contractors, or corporate oversight functions acting on the licensee’s behalf qualifies as licensee identification, consistent with existing Enforcement Policy principles.

These clarifications would significantly reduce classification disputes and regional variability, particularly in cases involving alarms, trends, or self-assessments.

Broadening the licensee-identified definition and clarifying the self-revealed definition will materially change outcomes in many of the scenarios SECY-25-0045 is intended to address and, importantly, this approach does not reduce NRC authority or oversight. NRC-identified findings remain unchanged, and SRM-SECY-25-0045 explicitly retains follow-up inspection for licensee-identified White findings. The proposed recalibration simply ensures that identification credit is aligned with licensee intent and investment in self-monitoring.

Illustrative Impact of Revised Identification Criteria

To understand whether the current definitions meaningfully constrain implementation of the Commission’s direction in SRM-SECY-25-0045, a limited retrospective review was performed of White inspection findings since January 2020. The purpose of this review was not to reassess safety significance or re-evaluate performance outcomes, but to assess how often White

findings currently characterized as self-revealed were identified through deliberate licensee testing or monitoring prior to loss of function.

Based on publicly available inspection reports and supporting documentation, this review identified a subset of findings currently characterized as self-revealed where available information indicates the condition was recognized through deliberate licensee testing or monitoring prior to functional failure.

Applying a conservative interpretation of the proposed clarified definition, approximately 6 of 28 White findings (22%) over the past six years would potentially meet the revised licensee-identified criteria.

This illustrative range is not intended to suggest that these findings should have been screened differently for safety significance, or that the ROP mischaracterized performance. Rather, it highlights that the current structural boundary between self-revealed and licensee-identified can, in a subset of cases, obscure the role of proactive licensee identification.

5. Regulatory Benefits and Potential Risks

A paired revision of the definitions would provide several regulatory benefits. It would strengthen safety culture messaging by reinforcing that early identification through robust monitoring and assessment is expected and valued. It would improve predictability and consistency by reducing classification disputes at the boundary between self-revealed and licensee-identified, particularly as the identification source now affects Action Matrix outcomes for White findings. It would also enhance oversight efficiency by focusing NRC resources on conditions that most clearly indicate programmatic vulnerability or weakness, while maintaining verification through follow-up inspection.

Potential risks include concerns about performance masking or inconsistent application across regions and ROP cornerstones. These risks are minimal as the revised definitions will reduce subjectivity for inspectors and apply to low and very low safety significant issues. NRC follow-up inspections will be performed for licensee-identified White findings. Establishing clear, objective criteria and illustrative examples in IMC-0612 will help ensure consistent and uniform application.

6. Conclusion

The Commission's direction in SRM-SECY-25-0045 represents a deliberate policy shift to better recognize proactive licensee identification while preserving regulatory rigor. That choice cannot be fully implemented by revising the licensee-identified definition in isolation. The historical expansion of the self-revealed definition has captured many outcomes of deliberate licensee self-monitoring and would now conflict with the Commission's intent.

Revising both definitions together by broadening licensee-identified to explicitly recognize modern proactive discovery mechanisms and adjusting self-revealed to its intended scope as described in Table 1, offers a principled, bounded, and implementable path forward that aligns the ROP with long-standing enforcement philosophy, modern operational realities, and recent Commission policy direction.

Table 1. Side-by-side of current and proposed definitions

<p>Current Definition (IMC 0612, Eff. 05/18/2026)</p>	<p>Proposed Definition</p>
<p>03.05 Licensee-Identified.</p> <p>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.</p> <p>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.</p>	<p>03.05 Licensee-Identified.</p> <p>(With blueline changes)</p> <p>Licensee-identified findings and violations are (1) identified as a result of deliberate observation, monitoring, or evaluation including or good questioning attitude by licensee personnel; and (2) entered into the licensee corrective action program.</p> <p>Examples of deliberate observations, monitoring, or evaluation and good questioning attitude that result in licensee-identified findings or violations include conditions that are recognized and entered into the corrective action program prior to NRC identification, that are not the direct result of a self-revealing event, and that are identified (1) those identified during activities such as; post maintenance testing, operator rounds, engineering walkdowns, drills, critiques, or audits, and licensee-directed reviews; and (2) degraded conditions identified during testing which do not result in test failure (2) through licensee established early-detection alarms, indications, or monitoring that identify degraded or changing plant conditions before required limits, acceptance criteria, or operational thresholds are exceeded; or (3) during post-maintenance, preventive, predictive, or diagnostic testing including degraded or off-normal conditions observed during any testing activity where the test procedure does not require a failure or unsatisfactory determination for the condition observed or are not within the scope of the test being conducted.</p> <p>(Without Blueline changes)</p> <p>Licensee-identified findings and violations are (1) identified as a result of deliberate observation, monitoring, or evaluation including good questioning attitude by licensee personnel; and (2) entered into the licensee corrective action program.</p> <p>Examples of deliberate observations, monitoring, or evaluation and good questioning attitude that result in licensee-identified findings or violations include conditions that are recognized and entered into the corrective action program prior to NRC identification, that are not the direct result of a self-revealing event, and that are identified (1) during activities such as; operator rounds, engineering walkdowns, drills, critiques, or audits, and licensee-directed reviews; (2) through licensee established early-detection alarms, indications, or monitoring that identify degraded or changing plant conditions before required limits, acceptance criteria, or operational thresholds are exceeded; or (3) during post-maintenance, preventive, predictive, or diagnostic testing including degraded or off-normal conditions observed during any testing activity where the test procedure does not require a failure or unsatisfactory determination for the condition observed.</p>

<p>03.17 Self-Revealed.</p> <p>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.</p> <p>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.</p>	<p>03.17 Self-Revealed.</p> <p>(With blueline changes)</p> <p>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.</p> <p>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; surveillance testing where the test procedure requires a failure or unsatisfactory determination for the condition observed; valid plant or electronic dosimeter alarms; alarms or indications that actuate as a result of exceeding required limits, acceptance criteria, or operational thresholds; identification of large quantities of fluids in areas where one would not normally expect such a condition.</p> <p>(Without blueline changes)</p> <p>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.</p> <p>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; surveillance testing where the test procedure requires a failure or unsatisfactory determination for the condition observed; alarms or indications that actuate as a result of exceeding required limits, acceptance criteria, or operational thresholds; identification of large quantities of fluids in areas where one would not normally expect such a condition.</p>
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