INSPECTION MANUAL CHAPTER 0609, ATTACHMENT 5

INSPECTION FINDING REVIEW BOARD

Effective Date: 11/19/2026

0609.05-01 PURPOSE

The purpose of the Inspection Finding Review Board (IFRB) is to provide a formal framework to obtain regional staff and management agreement on the proposed performance deficiency, identification credit, and to effectively manage the actions needed to reach a preliminary decision on the significance of inspection findings that do not initially screen to Green. This framework, through effective management oversight and project planning, aims to ensure that all involved regional managers and staff are aligned on the specific actions needed, the scope of the work to be done, and the associated schedule to reach an informed decision on licensee performance deficiencies and their preliminary significance prior to conducting a Significance and Enforcement Review Panel (SERP).

This document will be used in conjunction with Inspection Manual Chapter (IMC) 0609, “Significance Determination Process,” and IMC 0609, Attachment 1, “Significance and Enforcement Review Panel Process.” These procedures are intended to ensure the Significance Determination Process (SDP) is efficient through appropriate management oversight and planning of the disposition of potentially greater-than-Green (GTG) inspection findings.

0609.05-02 APPLICABILITY

This guidance is applicable across all seven cornerstones and all IMC 0609 appendices.

When proposed inspection findings in any cornerstone do not initially screen to Green using the appropriate SDP screening tools, in almost all cases, an IFRB should be convened by regional staff. A straightforward issue that experience has shown will ultimately result in a Green determination without significant effort would not require convening the IFRB.

For proposed findings in the security cornerstone that do not initially screen to Green, an IFRB or Security Issues Forum (SIF) should be convened. When a SIF is held in place of an IFRB, the SIF must fulfill the same objectives, tasks, and assignments that an IFRB would have accomplished.

An IFRB (or SIF for security issues) must be held when deviation from the published guidance for screening of performance deficiencies is proposed, for example to treat a performance deficiency that would screen to Minor as Green (or requiring further evaluation) or to treat a performance deficiency that would screen to Green as requiring further evaluation instead. The IFRB or SIF must approve the proposed approach with subsequent approval by the Director, Division of Reactor Oversight (DRO). Attendance at the IFRB or SIF by the DRO Director is not required but would support efficient decision-making. For an IFRB held for this purpose, complete Exhibit 1 to the extent practicable given the information known about the issue at the time, ensuring at least that the default screening path, the proposed screening path, basis for

the proposed deviation, and the IFRB outcome are documented. The form should be retained consistent with all other IFRB forms.

0609.05-03 OBJECTIVES

- Ensure regional management and staff align on the proposed licensee performance deficiency (PD), the degraded condition, how the performance deficiency is the proximate cause of the degraded condition, and identification credit. The proposed violation can be discussed, but alignment is not necessary at this point.

- Ensure there is early alignment on the scope, schedule, and involved resources to support an efficient and effective preliminary significance assessment.

- Develop any additional key messages to be communicated to licensee senior management by the IFRB Chair.

0609.05-04 GUIDANCE

The IFRB Worksheet (exhibit 1 of this procedure) is used to document the receipt, evaluation, and IFRB decisions for inspection findings for which the responsible branch chief, in consultation with other regional staff as appropriate, agree should be subject to an IFRB. Considering one of the outcomes of the IFRB is an approved performance deficiency, it is understood that, for SDP screening purposes, there needs to be a generally-agreed-upon proposed performance deficiency.

For non-deterministic SDPs, the IFRB should be convened when inspection findings do not initially screen to Green. However, the IFRB is not necessary for issues that do not initially screen to Green if the issue is straightforward and experience has shown it will ultimately result in a Green determination without significant effort (e.g., a bounding risk analysis).

For deterministic SDPs, the IFRB (or SIF) should be convened when inspection findings do not clearly screen to Green using the most appropriate IMC 0609 Appendix. An IFRB (or SIF) is not necessary when the proposed significance of the finding using deterministic SDP flowcharts appears to be exceedingly clear, obvious, and straightforward. In this rare circumstance ,the responsible branch chief should inform regional management when the decision is made to proceed without an IFRB, and the basis for this decision should be included on any future SERP forms for the issue. An IFRB (or SIF) can always be held based on management discretion.

For security inspection findings, a SIF can be used in place of the IFRB. The SIF provides a forum for regional and headquarters staff (Office of Nuclear Security and Incident Response (NSIR), Office of the General Counsel, Office of Enforcement, and Office of Nuclear Reactor Regulation) to solicit input from each other regarding a number of security inspection-related issues, including potentially GTG security findings. When using a SIF instead of an IFRB, the SIF must fulfill the same objectives, tasks, and assignments that an IFRB would have accomplished, including assignment of a designated division-level manager as the single point of contact for the issue.

The IFRB should consist of the IFRB Chair, who will be a Senior Executive Service manager and the Sponsor for the finding (this individual should also normally be the Sponsor during the SERP process), the lead inspector, the Senior Reactor Analyst (SRA), the inspection and

projects branch chiefs responsible for inspection of the issue and responsible for overall NRC inspection activities at the site, and a regional enforcement specialist. Since the IFRB is a regional activity, attendance by headquarters staff is at the region's discretion. It may be beneficial to include the DRO Director for IFRBs in which a deviation from the default screening result is proposed, since DRO Director approval is necessary. Included in the IFRB should be a decision on whether a Planning SERP is needed, consistent with the guidance in section 02.01.a.2 of IMC 0609, Attachment 1.

It is beneficial to hold the IFRB promptly once it is known that an identified performance deficiency is potentially GTG to drive timely dispositioning of the issue. It is also beneficial to have as much certainty around the performance deficiency as possible at the IFRB since subsequent changes to the performance deficiency are likely to have resource implications. For this reason, regions should use judgement in determining when to schedule the IFRB, balancing the desire to delay for purposes of seeking additional information with the ability and desire to disposition the issue in a timely manner. However, it is also recognized that additional information might become available after the IFRB that changes the description of the degraded condition or warrants adjustments to the performance deficiency. A Follow-up IFRB should be considered when it is expected that there may be significant departures from what was agreed upon at the initial IFRB. For example, a Follow-up IFRB could be considered when:

- a change to the degraded condition, identification credit, or previously-aligned-upon performance deficiency is proposed that may result in a significant change to the previously-aligned-upon resources, schedule, and plan for assessing the significance, or
- a previous IFRB on the issue determined that a Follow-up IFRB should be held.

Following the IFRB (or SIF), the IFRB Chair will call senior site management to discuss the outcome of the IFRB and plan for dispositioning the issue. Specific topics to be discussed on this call include, but are not limited to:

- the outcome of the IFRB
- the performance deficiency and identification credit including, if applicable, that a licensee-identified White finding would not result in Action Matrix movement and would involve reduced follow-up
- NRC's planned schedule for dispositioning the issue
- any information needs to support dispositioning the issue
- the concepts of proximate cause and best available information, as necessary

Sensitivity should be given to the possible impact on the licensee of changes to resource and schedule plans, and the issue Sponsor should maintain communication with licensee management throughout the dispositioning of the issue.

Exhibit 1, "IFRB Worksheet," serves as the basis for the discussion of the concerns during the IFRB. The sections of the Worksheet contain a summary of the issue (section 1), the performance deficiency details and initial evaluation (section 2), inspection staff recommended action (section 3), and IFRB decisions (section 4). The IFRB Worksheet shall be promptly sent to the cognizant inspection branch chief and routed with SERP documentation if a SERP will be

held. The IFRB Worksheet shall be maintained in Agencywide Documents Access and Management System (ADAMS). See section 04.02.

Exhibit 2, “Inspection and Significance Determination Process Metrics,” is provided to illustrate the 255-day period from issue identification through final significance determination. The exhibit reflects the completion goals of 120 days from the issue identification until the final exit, 45 days to issue the inspection report or choice letter, and 90 days to complete the SDP evaluation and issue the final significance determination letter.

04.01 IFRB Worksheet

a. Section 1, “Issue Summary”

    1. General Information: Enter Facility Name, Docket/License #, EA Number and Responsible Inspection Branch.

    2. Brief Overall Issue Summary: Provide a short summary of the degraded condition or issue of concern and how it was identified. Describe how the performance deficiency is the proximate cause of the degraded plant condition. Determine if the issue should be considered for an “old design issue.”

    3. Enter Issue Start Date using the calendar drop-box. The other dates will auto-calculate. (Reference IMC 0307, Appendix A for guidance on determination of the event date).

    4. Answer whether the timeliness metric will be met and explain the reason. It is understood that at this point, it isn’t definitively known whether the metrics will be met, so the question should be answered based on the most reasonable projection given the information known at the time. It is best to raise potential concerns with meeting metrics early, even if they may ultimately be met.

b. Section 2, “Issue Information”

    1. Performance Deficiency and Associated Violation: Provide a concise statement of the performance deficiency and associated violation. This is the version of the performance deficiency that, after approval by the IFRB, will be used at the SERP and documented in the inspection report.

    2. Affected Structures, Systems, Components (SSCs), Operator Actions, and Risk-Relevant Functions: List the SSCs, operator actions, and relevant probabilistic risk assessment (PRA) functions that have been affected by the identified performance deficiency. The functions important to the SDP are the risk-relevant functions as described in documents such as the plant risk information e-book (PRIB), the NRC’s Standardized Plant Analysis Risk (SPAR) model, the historical SDP notebooks, or the licensees PRA. The functions may be different from the “specified safety function” as described in the plant’s Updated Final Safety Analysis Report.

    3. Conditions When the Performance Deficiency Would Manifest Itself: Describe the type of accident, environmental conditions, plant configuration (as applicable) during which the performance deficiency would impact plant safety.

4. Initial SDP Screening: Determine which cornerstones are affected. Provide basis for more-than-minor determination. Provide the basis for why the finding does not screen to Green in the applicable IMC 0609 Appendix.

5. Exposure Time: Enter the duration the degraded condition existed or is assumed to have existed, including repair time. Include both the start time and end time for the exposure period, along with the basis for the selection of these dates/times. Describe whether T (if the actual start time of PRA non-functionality is known) or T/2 (if the actual start time of PRA non-functionality is not known) should be considered for calculating the duration. When using T/2, the time period to be halved starts with the last known time the SSC was definitively shown to be PRA functional. Any repair time in which the SSC was unable to perform a PRA function is always included in the exposure time. Additional information about the determination of exposure time is included in the Risk Assessment Standardization Project (RASP) Handbook. Consult with the SRA to determine the exposure time.

6. Are External Events Likely to be the Main Risk Contributor (i.e., earthquake, fire, external flooding, and tornados/high winds): Answer yes/no and if yes, describe the scenarios where the affected component(s) would be called upon.

7. Is Recovery of the “Failed Function” Credible? Describe the conditions for which the licensee may be able to recover the function that was impaired or lost as a result of the performance deficiency. For example, if an operator action could be taken, is there training provided, procedures already established, and equipment necessary to take the action available. Is credit for Flexible Coping Strategies (FLEX) equipment appropriate?

8. Describe How Current PRA Techniques and Tools and Tools Apply. Are the existing PRA models and techniques sufficient to adequately determine the issue significance? Which risk metric will be used for the SDP evaluation (delta core damage frequency, delta large early release frequency, condition core damage probability)? If not, describe alternate means available or needed to determine significance.

9. Additional Issue Complexities, if any.

10. Licensee’s Perspective. Provide licensee’s position on the performance deficiency, if known.

c. Section 3, “Branch Recommendations”

1. Select from the following options:

(a) Region completes the detailed risk evaluation (DRE) or finalizes the deterministic evaluation. Proceed to SERP, if necessary. Select this option when the SRA or other regional staff determined that the finding can be evaluated with regional resources only. If possible, estimate a planned completion date for the evaluation and planned SERP date. Coordinate with regional enforcement staff for the planned completion date(s).

(b) Request additional resources. Proceed to Planning SERP. Select this option when resources outside the region are necessary for completing the DRE or

deterministic evaluation. Identify the additional resources required and form an SDP project team with all the individuals needed to complete the analysis. List those individuals on the IFRB Worksheet. Schedule a Planning SERP and provide the date on the IFRB Worksheet. Conduct Planning SERP in accordance with IMC 0609, Attachment 1.

2. Proposed next steps. Include proposed next steps and actions, including proposed milestones and assignments for discussion at the IFRB.

d. Section 4, “IFRB Outcome”

1. Document the IFRB date and the date of any previous IFRBs on the issue.

2. Indicate whether this is an Initial IFRB or Follow-up IFRB. If it is a Follow-up IFRB, document the reason for the Follow-up IFRB.

3. Document IFRB logistical information.

4. List the IFRB attendees.

5. Document pertinent discussion or comments resulting from the IFRB related to the issue, including actions and due dates, as applicable. Additional actions could include, for example, gathering more information, additional evaluation of the performance deficiency, or accelerated due dates.

6. If the performance deficiency discussed at the IFRB is not approved, determine what is required for approval, next steps, and document who is to complete the action. Determine if communication with the licensee is required to complete any of the actions developed.

7. If the performance deficiency discussed at the IFRB is approved, the IFRB Chair shall contact the respective licensee’s senior management to inform them of the region’s decision to move forward with conducting a DRE and/or a Planning SERP. The IFRB Chair shall advise licensee management that all subsequent management level communications on the finding should be coordinated through the IFRB Chair. The IFRB Worksheet should guide this discussion along with supplemental information, as necessary, provide by regional staff.

04.02 IFRB Documentation Retention

This section applies to both IFRB Worksheets and SIF Worksheets. Worksheets are non-public because they contain pre-decisional enforcement information.

Once the IFRB/SIF is completed, the Worksheet should be treated as a record of the IFRB/SIF, entered into ADAMS, and not further edited. Submit the approved and finalized Worksheet in the native application (e.g., MS Word) to the Document Processing Center to be declared as an Official Agency Record. This also applies to Worksheets associated with issues that will not move forward with a SERP. If a Follow-up IFRB is held, it should have its own IFRB Worksheet. Worksheets should be included in the information provided to SERP members ahead of a SERP or PRCR.

The region is responsible for entering the IFRB Worksheet into ADAMS. NSIR is responsible for entering the SIF Worksheet into ADAMS.

For retrievability and accountability, the Worksheet should be profiled as follows:

ADAMS Property	**Requirement**
Document Title	Must include the reactor name, brief description of the PD or affected component, and "IFRB"
Availability	Select "Non-publicly Available"
Document Type	Select "Enforcement Action Worksheet"
Docket Number	Select the appropriate docket number(s)

0609.05-05 REFERENCES

IMC 0307, Appendix A, "Reactor Oversight Process Self-Assessment Metrics and Data Trending"

IMC 0609, "Significance Determination Process"

IMC 0609, Attachment 1, "Significance and Enforcement Review Panel Process"

END

List of Exhibits:

1. IFRB Worksheet
2. Inspection and Significance Determination Process Metrics

List of Attachments:

1. Revision History Table for IMC 0609 Attachment 5

Exhibit 1: IFRB Worksheet (non-public MLXXXX)

INSPECTION FINDING REVIEW BOARD WORKSHEET If issue will go to SERP, attach to the SERP Worksheet and route together.			
Section 1 – ISSUE SUMMARY Lead branch to complete prior to IFRB			
Facility: Click here to enter text.		Licensee: Click here to enter text.	
IFRB Chair: Click here to enter text.		Lead Branch: Click here to enter text.	
Issue Summary: Provide a short summary of the degraded condition or issue of concern and how it was identified. Describe how the performance deficiency is the proximate cause of the degraded plant condition.			
Issue Start Date	120 Days	165 Days	255 Days
See IMC 0307 Appendix A, section 03.03 for guidance	Interim goal for exiting with IFRB-approved performance deficiency	Interim goal for issuing preliminary significance choice letter/report	Metric for issuing escalated SDP enforcement action
Click to add date	Click to add date	Click to add date	Click to add date
Is the assessment expected to exceed any timeliness metrics? ☐ Yes ☐ No *If Yes, please explain the cause and any actions that might improve the timeline:* *If No, please identify any potential issues that may challenge the metric:*			
Section 2 – ISSUE INFORMATION (All subsections may not be applicable to every issue) Lead Branch to complete prior to IFRB with support from the SRA and other regional staff as needed			
Proposed Performance Deficiency: ☐ Licensee-identified ☐ NRC-identified ☐ Self-revealed Provide a concise statement clearly stating deficient licensee performance and degraded plant condition based on proximate cause. Ref IMC 0612 Section 03.02			
Associated Violation (if known and applicable): Click here to enter text.			
Affected Structures, Systems, Components (SSCs), Operator Actions, and Risk-Relevant Functions: Click here to enter text.			
Conditions when the performance deficiency would manifest Itself (e.g., type of event, plant configuration): Click here to enter text.			
Initial SDP Screening: Click here to enter text.			

Exposure Time: Click here to enter text.		
Are External Events Likely to be the Main Risk Contributor (e.g., earthquake, fire, external flooding, and tornados/high winds)? ☐Yes ☐No If yes, briefly describe the scenario where the component(s) would be called upon.		
Is Recovery of the "Failed Function" Credible? ☐Yes ☐No If yes, describe under what conditions.		
Do Current PRA Techniques and Tools Apply? ☐Yes ☐No If not, describe alternate means to determine significance.		
Additional Issue Complexities, if any: Click here to enter text.		
Licensee's Perspective of the Issue: Include description of licensee's position on the performance deficiency if known.		
Section 3 – BRANCH RECOMMENDATIONS Lead Branch to complete prior to IFRB with support from the SRA or other regional staff. If no IFRB, document the basis.		
☐	Region completes the DRE or finalizes the deterministic evaluation. Proceed to SERP, if necessary	☐ PD subject to DRE is licensee-identified Document the basis
☐	Request Additional Resources. Proceed to a Planning SERP.	Reason(s) a Planning SERP is recommended: Click here to enter text.
		Additional comments for Planning SERP consideration: Provide any additional comments e.g., known conservatisms, significant uncertainties, influential assumptions.
		Proposed Planning SERP Date: Click here to enter a date.
Proposed next steps and needs: Discuss proposed evaluation methodology, level of effort, and resource needs.		

Additional Information required	Owner	Due date
		Click here to enter a date.
		Click here to enter a date.
		Click here to enter a date.

Section 4 – IFRB OUTCOME
Lead branch to complete at IFRB

IFRB Date: Click to add date	Previous IFRBs: Click here to enter text.

IFRB Type: ☐ Initial ☐ Follow-up
Provide reason for Follow-up IFRB if applicable (e.g., revised PD)

IFRB Participants:
IFRB Chair: Click here to enter text.
Lead Inspector: Click here to enter text.
Projects Branch: Click here to enter text.
Other(s): Click here to enter text.
Inspection Branch Chief: Click here to enter text.
SRA: Click here to enter text.
Enforcement Specialist: Click here to enter text.

Summary of IFRB Discussion:
Provide a short summary of the IFRB discussion topics and key decisions

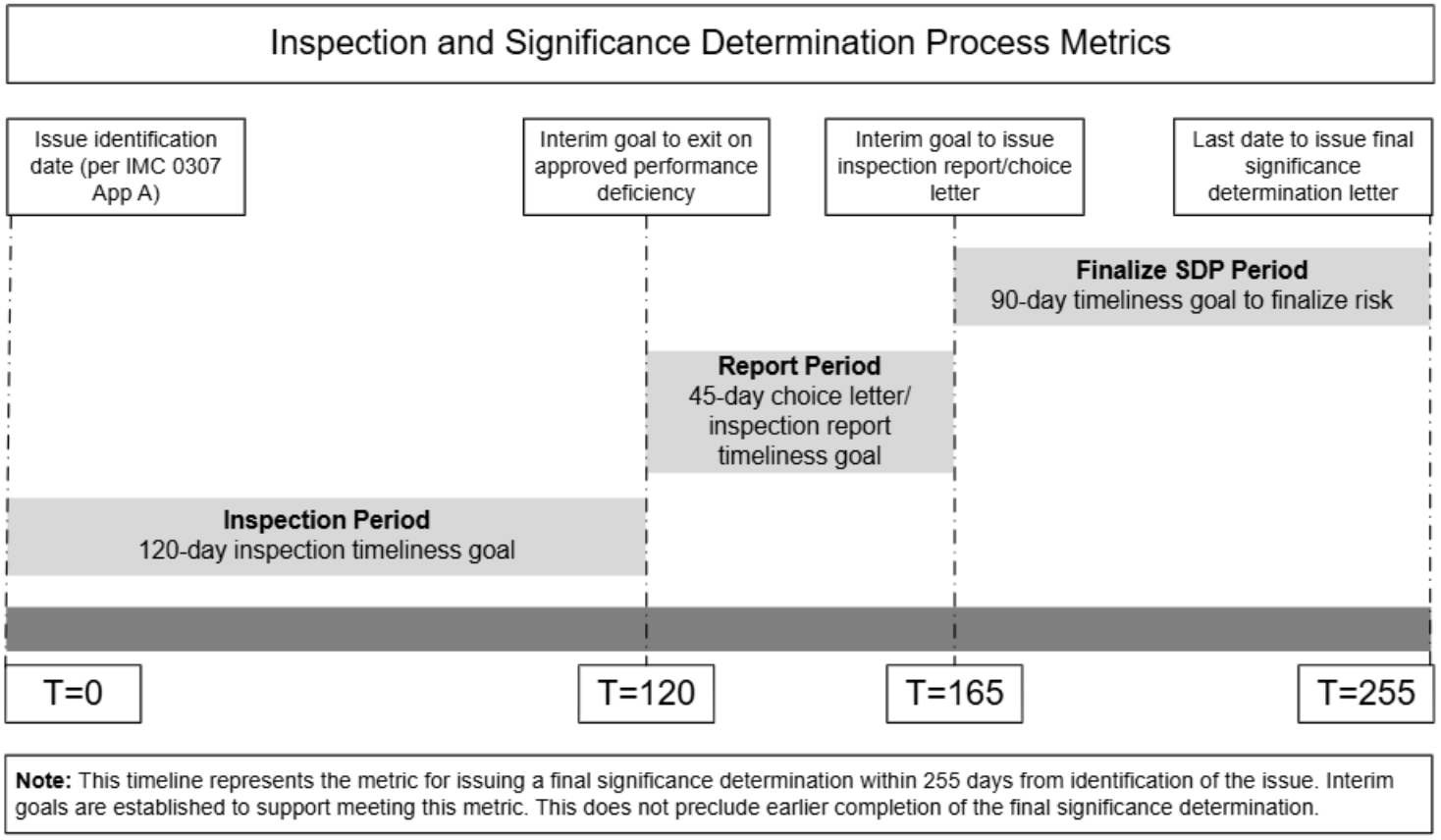
Performance Deficiency Approved: ☐ Yes ☐ No
State the exact approved performance deficiency

Next Steps and Actions:
☐ Green issue, no SERP ☐ Planning SERP ☐ Complete SDP evaluation and SERP

Assigned Date	Action	Owner	Due date
Click here to enter a date.			Click here to enter a date.
Click here to enter a date.			Click here to enter a date.
Click here to enter a date.			Click here to enter a date.

IFRB Chair: Click here to enter text.	Date Approved: Click to add date
IFRB Chair to discuss IFRB outcome with senior licensee management. *List any additional key messages beyond items already included in this form. See section 4 of this guidance for topics that should be discussed with the licensee.*	Licensee individual: Click here to enter text. Date contacted: Click to add date

Exhibit 2: Inspection And Significance Determination Process Metrics



Attachment 1: Revision History for IMC 0609 Attachment 5

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)
	ML16103A405 10/28/16 CN 16-028	This is a new inspection manual chapter developed as part of an NRC initiative to improve the efficiency and effectiveness for making decisions on GTG inspection findings. This document will be used throughout a test phase which is expected to be completed by December 31, 2017, if not sooner.	Presentations were made in three regional offices prior to procedure issuance. In addition, question and answer sessions will be conducted shortly after the procedure is issued.	ML16110A211
	ML18187A183 10/23/18 CN 18-036	Revised to incorporate applicable recommendations from the IFRM Effectiveness Review Report (ML18123A319). Changes primarily reflect expansion of the IFRM process to all Reactor Oversight Process (ROP) cornerstones, revised criteria for holding an IFRB, and clarifications to the purpose of an IFRB. The IFRB-SERP worksheet was revised with the SERP worksheet being relocated to IMC 0609 Attachment 1 and the IFRM survey that supported the pilot period was removed.	No	ML18191A004
	ML18341A101 12/07/18 CN 18-041	Minor revision to provide additional clarity on when a Follow-up IFRB is needed.	No	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)
	ML23285A082 12/15/23 CN 23-037	Revised to make it clear that convening an IFRB should be the default action when findings do not screen to Green across all ROP cornerstones. If a decision is made to not hold and IFRB or SIF for a proposed GTG finding, regional management should be informed. Deleted Exhibit 3, Estimated Time for SDP Completion, based on feedback that it was not necessary, difficult to work with, and not being used. Revised exhibit 2, the SDP metrics figure, to account for changes to metrics since the last revision in 2018. Revised the IFRB Worksheet to expand discussion on potential challenges to meeting timeliness metrics. Enhanced IFRB Worksheet to provide space for IFRB Chair key messages.	None	ML23285A323 FBF 0609.05-2454 ML22090A237
	ML26098A308 04/30/26 CN 26-015	Minor revisions made to align with updates to the issue screening process, which allow for an IFRB as part of approving a deviation from issue screening guidance 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
	ML26288A034 11/19/26 CN 26-053	Minor editorial clarifying revisions to Exhibits 1 and 2 with cleaner appearance of Exhibit 2.	None	N/A