**NRC INSPECTION MANUAL** IRAB

INSPECTION MANUAL CHAPTER 0612 APPENDIX B

ADDITIONAL ISSUE SCREENING GUIDANCE

Effective Date: 01/01/2021

Figure 1: Issue Screening



Figure 2: Issue Screening (Traditional Enforcement)



Additional Guidance to Clarify Figures

Inspectors will not use the Reator 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 screen 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, inspectors will not consider the traditional enforcement aspect as part of the ROP performance deficiency.

|  |
| --- |
| 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.  For issues of concern with multiple examples, inspectors will screen each example separately.  On rare occasions, 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 8.4, “Management of Facility-specific Backfitting and Information Collection.” | |

| 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 or enforcement discretion 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 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    * Radiological emergencies 3. Is there a SL-IV or greater violation with no associated performance deficiency?   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 | 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 the degraded condition. 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. Organzational weaknesses should not be identified as performance deficiencies, but should be considered as the CCA. The impact of an organizational weakness could be a PD.  (3) Enforcement Manual, Part I, Section 1.3.5, “Documenting Related Violations,” discusses grouping closely related violations.  Considering this guidance, when an issue of concern 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.  (4) When more than one performance deficiency exists associated with an issue of concern, consideration may be given to selecting a performance deficiency that captures the most significant risk increase of the concern and represents current licensee performance.  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. LIC-100, “Control of Licensing Bases for Operating Reactors,” provides insights into what documents may constitute current licensing basis. * Failure to meet an industry standard constitutes a performance deficiency only 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 3 | Is the performance deficiency More-than-Minor? |
| --- | --- |
| If the answer to any of the following questions is “yes,” then the performance deficiency is More-than-Minor and is a finding. If the answer to all of the following questions is “no,” then the performance deficiency is minor and is not a finding.   * Could the performance deficiency reasonably be viewed as a precursor to a significant event? * If left uncorrected, would the performance deficiency have the potential to lead to a more significant safety concern? * Is the performance deficiency associated with one of the cornerstone attributes listed at the end of this attachment and did the performance deficiency adversely affect the associated cornerstone objective?   Inspectors shall use IMC 0612, Appendix E, “Examples of Minor Issues,” to inform answers to the screening questions listed above. | |

| Block 4 | Does the finding screen to Green? |
| --- | --- |
| Inspectors will screen all findings using IMC 0609, Attachment 4, “Phase 1 – Initial Screening and Characterization of Findings” worksheet. Any finding which cannot be determined to be Green will require a Significance Enforcement Review Panel (SERP). | |

| Block 5 | Is the finding licensee-identified? |
| --- | --- |
| In determining whether a finding is licensee-identified, NRC-identified, or self-revealing, a measure of subjectivity is anticipated and accepted. To make these determinations, inspectors and regional staff should consider not only the definitions of these terms, but also past experience, related precedents, and the over-arching regulatory message that the determination could send. | |

| Block 6 | Identify appropriate cross-cutting aspect(s) |
| --- | --- |
| To identify an appropriate cross-cutting aspect 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 aspect listed in IMC 0310 that best reflects the performance characteristic that is the most significant contributor to the finding (i.e., determine which cross-cutting aspect provides the most meaningful insight into why the finding occurred.) A cross-cutting aspect is a finding characteristic which inversely relates to the reason why the performance deficiency occurred. The cross-cutting aspect is not a finding.   Note that:   * Typically, the staff will assign no more than one cross-cutting aspect to a finding. On rare occasions, when the regional staff considers that a unique or complex inspection finding warrants more than one cross-cutting aspect, before associating more than one cross-cutting aspect to any finding, the regional office will contact the Performance Assessment Branch Chief (NRR/DIRS/IRAB) for concurrence. * For a finding to have multiple examples, the same cross-cutting aspect should be associated with each example, consistent with Enforcement Manual Section 2.13.7. (Unless examples have the same cross-cutting aspect, they can’t be examples of the same finding.) | |

| Block 7 | Should the Issue Involving a Current Licensing Basis Question be Closed Using the Very Low Safety Significance Issue Resolution (VLSSIR) Process?[[1]](#footnote-2) |
| --- | --- |

Inspectors can use the VLSSIR process to discontinue evaluation of an issue involving a current licensing basis question in which the issue cannot be resolved without a significant level of effort and an expenditure of resources the agency has chosen not to utilize because the issue is expected to be of very low safety significance if found to be valid.

If the question as to whether an issue is within the current licensing basis cannot be resolved without a significant level of effort, then the issue may be closed as part of the VLSSIR process. This process can be used if all of the following are met:

* The licensee has demonstrated, and provided a supporting basis, that the issue of concern is not in their current licensing basis; and
* The inspector (using the resource estimate in the applicable inspection procedure as a guideline, which may involve NRC Headquarters support) has not been able to conclude whether the issue of concern is part of the plant’s current licensing basis; and
* The issue (if it were assumed to be an inspection finding) would have insufficient safety significance to warrant additional resource expenditure (i.e., the issue would be very low safety significance as defined in the ROP). The inspector determines whether the issue has insufficient safety significance by processing the issue using IMC 0609, “Significance Determination Process,” and if the issue does not proceed to a “detailed risk evaluation,” or a Phase 2 evaluation when relevant, or Appendix M, then the issue would have insufficient safety significance; and
* The inspector’s branch chief concurrence that spending more time researching the current licensing basis is not likely to benefit public health and safety relative to other inspection activities.

If all of the above are met, the issue can be closed by documenting in accordance with IMC 0611-12.03, “ Very Low Safety Significance Issue Resolution Process” or IMC 0611-06, “Unresolved Items,” if an Unresolved Item (URI) was previously opened on the issue and now requires to be closed.

If all of the above are not met, the issue may be dispositioned as an IMC 0611-06, “Unresolved Item,” pending completion of further licensee or NRC actions necessary to resolve the item. NRC actions to resolve the issue may include the application of the COM-106 (TAR) Process. COM-106 may provide recommendations to inform NRC decisions to be taken to close out the issue, in accordance with its criteria and guidance. Entry into the TAR process will be applicable if the following conditions exist.

* it is a plant-specific issue, and
* issue not of very low safety significance as determined by the SDP, and is
* the issue is associated with (1) plant licensing basis, (2) NRR staff technical position, or (3) risk significance of: plant configuration, event, or operating practice.

| Block 8 | Consider an URI |
| --- | --- |
| Inspectors should 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: Inspectors may not use a URI to obtain more information to determine the significance of a finding. | |

|  |
| --- |
| Figure 2, “Issue Screening (Traditional Enforcement)” |

|  |  |
| --- | --- |
| Block TE3 | Can ROP screening proceed without compromising investigation? |
| Each issue of concern warranting a willfulness investigation triggers a process to determine whether disposition of the associated ROP performance deficiency may proceed without compromising the OI investigation.  Generally, to preclude the possibility of compromising an ongoing willfulness investigation, inspectors should suspend ROP disposition activities that require licensee interaction until the investigation is complete. However, because SDP insights developed during issue dispositioning are integral to dispositioning most traditional enforcement violations, inspectors should disposition ROP performance deficiencies in a timely manner. So, to balance these competing considerations, whenever ROP disposition activities could possibly compromise an ongoing investigation, the Directors (or their designees) of the OI Field Office, DIRS, the associated Regional Division of Reactor Projects or Safety, and OE should reach a consensus decision on whether ROP dispositioning should be suspended or may proceed during the investigation. The parties involved in this decision should ensure that their specific concerns are considered in order to achieve the two desired agency outcomes – a valid and defendable ROP finding and a valid and defendable violation within the enforcement program.  If the decision is to suspend ROP dispositioning, then as soon as the investigation is sufficiently complete or whenever new information arises that might otherwise warrant reevaluating that decision, the parties involved in the decision should revisit the decision, and change it if change is warranted. | |

|  |  |
| --- | --- |
| Block TE4 | 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 while simultaneously assuring that ROP disposition activities are not delayed longer than necessary. | |

|  |  |
| --- | --- |
| 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 investigation. Using the facts/conclusion above, OGC will make a final determination about willfulness. | |

|  |  |
| --- | --- |
| Block TE6 | Screen performance deficiency (Figure 1 Block 3) |
| The absence of a finding may influence but does not preclude the potential to confirm a willful violation, though it may influence the determination of its severity level and/or civil penalty. Similarly, the presence of a finding does not preclude the potential to confirm no willful violation. However, if a willful violation is determined to exist, it may influence the determination of its severity level and/or civil penalty. | |

| Block TE7 | Confirmed willful violation |
| --- | --- |
| To disposition violations involving confirmed willfulness, inspectors shall coordinate with the Office of Enforcement through the Regional Enforcement Coordinator. Additional guidance is contained in the Enforcement Policy and Enforcement Manual.  A violation may be considered more significant than the underlying noncompliance if involves willfulness. When determining the severity level of a willful violation, the NRC, in addition to considering the willful aspects, considers the (1) actual safety consequences, (2) potential safety consequences, including the consideration of risk information, and (3) potential for impacting the NRC’s ability to perform its regulatory function. A notice of violation is normally required for a willful violation. However, a non-cited violation may still be appropriate. Refer to the Enforcement Policy for additional guidance.  The approval of the Director, Office of Enforcement, with consultation with the Deputy Executive Director as warranted, is required for dispositioning willful violations as non-cited violations. | |

|  |  |
| --- | --- |
| Block TE8 | Does the violation warrant enforcement discretion? |
| For violations involving enforcement discretion, inspectors shall coordinate their actions with the Regional Enforcement Coordinator. Additional guidance is contained in the Enforcement Policy and Enforcement Manual.  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. | |

| Block 7 | Consider a URI |
| --- | --- |
| See Block 7 for Figure 1 | |

Cornerstone Objectives and Attribute Tables

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

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

| Cornerstone | REACTOR SAFETY – Barrier Integrity |
| --- | --- |
| Objective | To provide reasonable assurance that physical design barriers (fuel  cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. |
| Attributes | Areas to Measure (to Maintain Functionality of Fuel Cladding) |
| Design Control | Physics Testing, Core Design Analysis (Thermal Limits, Core Operating Limit Report, Reload Analysis, 10 CFR50.46) |
| Configuration Control | Reactivity Control (Control Rod Position, Reactor Manipulation, Reactor Control Systems), Primary Chemistry Control, Core Configuration (Loading) |
| Cladding Performance | Loose Parts (Common Cause Issues), RCS Activity Level |
| Procedure Quality | Procedures which could impact cladding |
| Human Performance | Procedure Adherence (FME, Core Loading, Physics Testing, Vessel Assembly, Chemistry, Reactor Manipulation), FME Loose Parts, Common Cause Issues |
| Attributes | Areas to Measure (to Maintain Functionality of RCS) |
| Design Control | Plant Modifications |
| Configuration Control | System Alignment, Primary/Secondary Chemistry |
| RCS Equipment and Barrier Performance | RCS Leakage, Active Components of Boundary (Valves, Seals), ISI Results |
| Procedure Quality | Routine OPS/Maintenance Procedures, EOPs and related Off-Normal Procedures invoked by EOPs |
| Human Performance | Routine OPS/Maintenance Performance, Post Accident or Event Performance |
| Attributes | Areas to Measure (to Maintain Functionality of Containment) |
| Design Control | Plant Modifications, Structural Integrity, Operational Capability |
| Configuration Control | Containment Boundary Preserved, Containment Design Parameters Maintained |
| SSC and Barrier Performance | S/G Tube Integrity, ISLOCA Prevention, Containment Isolation, SSC Reliability/Availability, Risk Important Support Systems Function |
| Procedure Quality | Emergency and Operating Procedures, Risk Important Procedures (OPS, Maintenance, Surveillance) |
| Human Performance | Post Accident or Event Performance, Routine OPS/Maintenance Performance |
| Attributes | Areas to Measure (to Maintain Radiological Barrier Functionality of Control Room and Auxiliary Building – PWR, and Standby Gas Trains – BWR only) |
| Design Control | Plant Modifications, Structural Integrity |
| Configuration Control | Building Boundaries Preserved |
| SSC and Barrier Performance | Door, Dampers, Fans, Seals, Instrumentation |
| Procedure Quality | EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures |
| Human Performance | Post Accident or Event Performance, Routine OPS/Maintenance Performance |
| Attributes | Areas to Measure (to Maintain Functionality of Spent Fuel Pool Cooling System) |
| Design Control | Plant Modifications, Structural Integrity |
| Configuration Control | System Alignment |
| SSC Performance | Pumps, Valves, Instrumentation |
| Procedure Quality | EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures |
| Human Performance | Post Accident or Event Performance, Routine OPS/Maintenance Performance |

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

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

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

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

Attachment 1 – Revision History for IMC 0612 Appendix B - Issue Screening

| 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 orignial in ADAMS. | No |  |
|  | [ML030800420](https://www.nrc.gov/docs/ML0308/ML030800420.pdf)02/21/2003  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 |  |
|  | [ML031610690](https://www.nrc.gov/docs/ML0316/ML031610690.pdf)06/20/2003  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](https://www.nrc.gov/docs/ML0514/ML051400254.pdf)  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](https://www.nrc.gov/docs/ML0527/ML052700266.pdf)  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 |  |
|  | [ML060400499](https://www.nrc.gov/docs/ML0604/ML060400499.pdf)  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](https://nrodrp.nrc.gov/idmws/ViewDocByAccession.asp?AccessionNumber=ML063000483) |
|  | [ML071720417](https://www.nrc.gov/docs/ML0717/ML071720417.pdf)  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](https://www.nrc.gov/docs/ML0823/ML082310381.pdf)  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](https://nrodrp.nrc.gov/idmws/ViewDocByAccession.asp?AccessionNumber=ML083220751) |
|  | [ML091590496](https://www.nrc.gov/docs/ML0915/ML091590496.pdf)  12/24/2009  CN 09-032 | Rewrite Guidance and Flow Charts to:   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:    1. 1303 - enhance App E Maintenance Rule (MR) examples, remove MR specifics from App B    2. 1355 –enhance Performance Deficiency guidance (e.g. what constitutes a "standard")    3. 1362 - enhance MR minor screening guidance (see 1303)    4. 1366 - enhance minor screening guidance for improved consistency    5. 1398 - improve alignment between 0612 and Enforcement Policy (e.g. minor TE Violations)    6. 1418 – enhance minor screening guidance to reduce subjectivity per 2008 Consolidated ROP Internal Self-assessment (CRIS-08)    7. 1419 - enhance guidance for differentiating self-revealing vs. NRC- vs. License ID per CRIS-08    8. 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 | [ML091480470](https://nrodrp.nrc.gov/idmws/ViewDocByAccession.asp?AccessionNumber=ML091480470) |
|  | [ML12080A204](https://www.nrc.gov/docs/ML1208/ML12080A204.pdf)  09/07/2012  CN 12-020 | Complete Reissue. Simplified guidance. Added enforcement discretion path to traditional enforcement. |  | [ML12205A244](https://nrodrp.nrc.gov/idmws/ViewDocByAccession.asp?AccessionNumber=ML12205A244)  FF 0612B-1398, 1439, 1483, 1496, 1507, 1591, 167*9*, 1680, 1683, 1700, 1703 |
|  | ML17129A62412/13/17  CN 17-029 | Editorial update made to reflect the splitting of IMC 0612 into IMC 0611 for documentation and IMC 0612 for issue screening. |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 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) |
|  | 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. |  | ML19247C918  0612B-1433  ML19220A106  0612B-1436  ML19220A108  0612B-1564  ML19220A109  0612B-1887  ML19220A110  0612B-1929  ML19316A002  0612B-1934  ML19311C610  0612B-1970  ML19220A111  0612B-1997  ML19316A003  0612B-2014  ML19220A112  0612B-2029  ML19316A004  0612B-2203  ML19220A113 |
|  | 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 |

1. “Low Safety Significane Issue Resolution Working Group Recommendation” memo to Ho K. Nieh, Director Office of Nuclear Reactor Regulation (ML19260G224) [↑](#footnote-ref-2)