
INSPECTION MANUAL CHAPTER 0102

OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND EXAMINERS AT LICENSEE FACILITIES

0102-01 PURPOSE

Periodic industry feedback and internal reviews have identified the need for continued management involvement and oversight of NRC activities conducted at licensee facilities. This chapter describes the policy for management involvement and oversight of inspections, operator licensing examinations, audits, and other onsite inspection related activities at licensee facilities. This policy is intended to ensure the effective direction of activities, communication, and inspector objectivity at licensee facilities. Objectivity is the extent to which the inspector or examiner implements the NRC's programs, interfaces with the public and conducts both personal and work relationships in an unbiased manner, free from both partiality and antagonism toward a licensee or vendor, or the employees of a licensee or vendor, as evidenced by patterns of the inspector's or examiner's actions. The requirements and guidance provided in this section are to be used by NRC managers to verify employee performance and objectivity by direct observation of onsite activities at licensee facilities and through other available indirect methods as needed. Onsite activities include individual or team inspections, examinations, audits, visits, and reviews. NRC employees should use the applicable guidance and requirements of this section in the performance of their onsite activities.

0102-02 APPLICABILITY

Line management is responsible for overseeing employees that conduct onsite activities at licensee facilities by clearly establishing and communicating performance expectations, providing staff development opportunities, evaluating feedback from licensee licensees, and ensuring that onsite activities are performed as intended. Employees should be considered for recognition when management finds them exhibiting outstanding performance, superior technical expertise, continuing sound judgment and professional behavior. Management is expected not only to hold the staff accountable for its actions when instances of performance or conduct inconsistent with agency positions or supervisory expectations are detected, or an employee's objectivity is questioned, but also to address any staff developmental needs to prevent recurrence of the inappropriate action. Circumstances may arise which require greater management involvement above the levels described in these guidelines.

0102-03 RESPONSIBILITIES AND AUTHORITIES

03.01 Regional Administrators

- a. Regional administrators or their deputies are responsible to ensure sufficient routine management communication with each employee to maintain oversight and monitor objectivity of the employees when they are on site.

- b. Regional administrators or their deputies are responsible for monitoring regional management activities and visiting sites to ensure that all sites receive adequate attention and that all onsite activities receive adequate safety, security and management oversight.
- c. The regional administrators shall ensure that the appropriate NRR manager is informed of all significant issues.
- d. **Regional Administrators or their deputies should visit each of their sites at least once every 2 years.** During their site visits, regional administrators should focus their observations on ongoing and/or apparent safety and security issues. Also, they should overtly solicit feedback from their licensee counterparts regarding implementation of the NRC regulatory program at their facility. Regional administrators must ensure that adverse comments are validated and appropriate corrective actions are initiated. Should regional administrators or their deputies receive feedback from licensees that warrants capturing to be used as part of ROP annual assessments, record the feedback on a "Site Visit Observation Form" (NRC Form 649). See section 05.03 below for further details. Further, Regional administrators or their deputy should seek opportunities for public outreach as appropriate. This might include attendance at public exit meetings and other outreach opportunities, as appropriate. Consideration of public outreach should be consistent with the Action Matrix guidance.
- e. Regional administrators should make sure that licensees are aware that there are multiple tiers for raising concerns. Concerns regarding regional staff performance should be raised with the regional administrator, but concerns regarding the regional administrator should be raised to the EDO.

03.02 Division Directors

- a. Division directors should meet with their subordinate line managers on a regular basis (e.g., weekly) to discuss onsite activities, including significant findings, trends, and potentially generic issues. Their level of involvement should be proportional to the significance of the findings. They shall ensure that **an appropriate** NRC manager is present at those onsite activity exit meetings where findings have resulted in an apparent **or** significant finding.
- b. The **Division of Operating Reactor Safety (DORS)** division director or deputy should make every effort to visit each site at least once every 2 years. The **DORS** and **Division of Radiological Safety and Security (DRSS)** division directors or deputies should consider making contact with individual licensee managers or unit managers as appropriate to the ongoing and/or apparent, security or regulatory impact issues at the site. During site visits, **DORS and DRSS** division directors and their deputies should focus their observations on ongoing and/or apparent safety and security issues. Also, they should overtly solicit feedback from their licensee counterparts regarding implementation of the NRC regulatory programs at their facility. Division directors must evaluate the validity of the licensee's adverse comments and initiate appropriate action to correct the problem. Should regional administrators or their deputies receive feedback from licensees that warrants capturing to be used as part of ROP annual assessments, record the feedback on a "Site Visit Observation Form" (NRC Form 649). See section 05.03 below for further details. In addition, the **DORS** director or deputy should hold a brief personal discussion with the **senior** resident inspector (**SRI**) of each site periodically (i.e., about quarterly) to discuss ongoing and/or apparent safety, security or impact

issues; this discussion may take place during a site visit, during an inspector's visit to the regional office for other agency business, during a periodic inspection debrief, or **virtually**.

- c. Division directors shall ensure that the regional administrator is informed of all significant safety, security and any issues related to NRC employee performance, identified by or resulting from NRC onsite activities.
- d. Division directors and their deputies should periodically assess their activities to confirm that oversight activities are being performed.

03.03 Line Managers

- a. Line managers should keep abreast of onsite activities conducted by employees over whom they have supervisory authority.
 - 1. Line managers should discuss onsite activity plans with their employees before onsite activities begin to ensure the employee's activities are properly scheduled, coordinated and focused.
 - 2. Regional **project** line managers should talk with their resident inspectors at each of their sites several times a week.
 - 3. Line managers responsible for an onsite activity should discuss the findings and concerns with the employees assigned to the activity before the facility exit meeting is held. Discussions should focus on potential safety and regulatory approaches to issues to ensure mixed messages are not sent to the licensee.
 - 4. Line managers will oversee significance determinations of inspection findings and any enforcement decisions involving facilities or activities for which they are responsible.
 - 5. **Line managers should attend at least one exit meeting annually to observe their subordinate inspectors. This expectation can be accomplished by attending an** exit meeting for their subordinate resident and specialist inspectors if significant inspection or examination findings (e.g., potentially greater than green significance, possible escalated enforcement or unsatisfactory requalification examination) will be discussed. **Appropriate** line manager shall attend team inspection exit meetings as directed by their division directors and should supplement the discussion at the meeting, as necessary.
 - 6. Line managers responsible for an onsite activity should promptly and thoroughly debrief the assigned employees after the employees leave the site. Line managers must promptly intervene and communicate any changes in findings or conclusions to **project management and** shall promptly contact the licensee to discuss the changes if necessary.
 - 7. **Project** line managers shall ensure the **resident inspectors (RIs)** conduct inspections to maintain access to and familiarity with their backup sites or, if not assigned a backup site, are annually assigned to an inspection at another site. These efforts should be coordinated to ensure adequate site coverage is maintained at all reactor sites.

- b. Line managers should ensure that their division director and the regional division director are promptly informed of significant safety and regulatory issues identified by employees whom they supervise.
- c. Line managers shall ensure that inspectors do not track or trend minor issues. This means that line managers shall ensure that inspectors are not performing data analysis and charting of minor issues.
- d. Line managers from the region and Office of Nuclear Safety and Incident Response (NSIR) responsible for the Force-on-Force inspections shall observe each of their employees, if practicable, during an onsite activity at least once each calendar year. During their site visits, line managers may accompany any or all of their employees who are on site at the time of their visit. In addition, project line managers should visit one of the sites they are responsible for once a quarter. These visits may be combined (i.e., accomplished on one trip rather making two separate trips) for plants which are collocated or nearby (e.g., Salem/Hope Creek). Project line managers shall maintain unescorted access authorization at each of their sites.

Regional operator licensing managers should alternate their field observations between examination and inspection activities for their employees who are certified in both areas. When observing an examination, the manager should accompany the examiner during a complete operating test. Part-time (i.e., reserve) examiners are also subject to periodic observation and evaluation while administering operating tests. These observations shall:

- 1. be performed at least every 24 months by the regional operating licensing branch chief or a certified chief examiner, and
- 2. cover at least half of a walk-through (i.e., five system job performance measures and two administrative topics) and at least one simulator scenario.

These observations are in addition to and do not replace the annual accompaniments required by the part-time examiner's supervisor.

- e. Line managers should continuously assess the performance of their assigned employees using a combination of direct observation of the employees' activities during site visits and the review of their performance as portrayed in inspection or examination reports, telephone conversations, and other indirect methods. A line manager's site visit should be of sufficient duration to supplement the indirect methods of assessing the performance of their subordinate employees. Line managers should focus on the following applicable areas related to assessing their subordinate employees:
 - 1. Does the employee independently verify information from the licensee when appropriate?
 - 2. Does the employee adhere to NRC regulatory positions and policies when discussing issues with licensee or NRC management, avoiding personal interpretations and opinions?
 - 3. Does the employee maintain a professional relationship with the licensee using good interpersonal relationship skills?

4. Has the employee provided an accurate and balanced account of licensee performance and plant conditions in communications with NRC regional management via inspection reports, telephone calls, or other means?
 5. How do licensee staff and managers respond to the employee's questions or concerns?
 6. Is the employee focused on safety significant concerns, applying significance determination and enforcement guidance appropriately?
 7. Does the employee develop issues without biased interpretation of facts?
 8. Are findings adequately supported by the facts?
 9. Does the employee conduct exit interviews in accordance with NRC policies and practices?
- f. Line managers should tour the facility during their site visits. Facility tours should include those areas the employees would normally tour on a routine basis. **Project** line manager tours should include an overview of control room activities and inspector interactions with control room staff. The tour should be used to provide the line manager with insights regarding how well the licensee performs and how well the employee has characterized the licensee performance in communication with NRC regional management.
 - g. During site visits, line managers should make every effort to have discussions with maintenance, operations, radiological controls, engineering and technical support, quality control, and senior site managers as applicable. These discussions should include quality of licensee interactions with NRC employees or team inspections. Have there been significant conflicts or concerns with findings or the manner in which findings were communicated to the licensee?
 - h. Line managers should meet individually with their employees to discuss onsite activity-related performance and objectivity issues observed during each site visit.
 - i. Line managers **shall** document the objectivity of their assigned employees as part of the employees annual performance review. When patterns tend to indicate a loss of objectivity, corrective measures should be immediately implemented by regional management.

03.04 Senior Resident Inspectors

- a. SRIs should routinely brief their immediate supervisor on resident inspection issues and findings and should keep their supervisor informed of scheduled exit meetings.
- b. SRIs should keep abreast of all NRC onsite activities at the facility to which they are assigned. However, minor issues should not be tracked or trended.
- c. SRIs should attend entrance and exit meetings. If the SRI is unavailable, other **RIs** should attend in their place. For economy of time, meetings for multiple onsite activities should be combined whenever possible.

- d. To enhance objectivity, SRIs and RIs shall spend a minimum of 1 week each **calendar** year inspecting at another site. This inspection may be accomplished by participating in a team inspection at another site, or by visiting their backup site for familiarization.

03.05 Individual Inspectors, Team Leaders, and Examiners

- a. Inspectors, team leaders, chief examiners, and other staff who lead NRC onsite activities should develop an appropriate plan, brief and receive approval from the line supervisor responsible for the activity on their planned activities, and should provide a copy of the inspection, examination, or audit plan to the responsible regional supervisor before the onsite activities begin.
- b. All NRC staff who leads NRC onsite activities will conduct an entrance meeting with the principal facility personnel before beginning onsite activities. The SRI, or the RI in the SRI's absence, should be invited to all entrance briefings.
- c. All NRC staff who leads NRC onsite activities should brief the immediate line supervisors responsible for the activity and the SRI regarding their findings before any exit meeting with the facility licensee takes place.
- d. Inspectors, team leaders, chief examiners, and other staff who lead or participate in NRC onsite activities shall maintain a professional, objective relationship with licensee management and staff.

0102-04 REQUIREMENTS

Regional and NSIR line managers shall observe each of their permanently assigned inspectors, if practicable, during an onsite activity at least once each calendar year.

Line managers shall document the objectivity of their assigned permanent inspectors as part of the employee's annual performance review.

0102-05 GUIDANCE

05.01 General

Direct observation alone is not sufficient. Line managers must take an active role in the onsite activities that they oversee. They must engage their employees in open, two-way communication regarding their inspection or examination findings so that both parties fully understand the issues and the appropriate regulatory approach to those issues. By sharing their perceptions, opinions, and philosophies, employees will gain a better understanding of what their supervisors expect of them and supervisors will gain valuable insights to the capabilities and shortcomings of their employees and the inspection program. Similarly, reviews of inspection reports, peer reviews, involvement in enforcement actions, senior management debriefings, management self-assessments, involvement in developing mid-cycle and end-of-cycle assessment reports, and feedback from licensees can provide additional insights to the conduct, objectivity, and performance of employees and managers as well.

- a. Every level of management must clearly communicate to its subordinates the agency's expectations regarding the duties of inspectors and examiners and the principles to be applied in the performance of those duties.
- b. Only trained and qualified (IMC 1245 Appendix A **or equivalent**) individuals having the knowledge and aptitude to perform onsite activities in a manner consistent with agency expectations should be assigned to perform independent onsite activities.
- c. When onsite activities are initiated, line managers must oversee those activities to ensure that the agency's expectations and principles regarding inspectors and examiners are satisfied.
- d. There are no restrictions on the number of site assignments or total time in position for RIs provided that their performance remains acceptable as defined by Management Directive 10.67, "Non-SES Performance Appraisal System." Hence, **RIs** and their managers should maintain the flexibility to make job assignments and career decisions in the best interest of both the NRC and the individual.
- e. Throughout this IMC, the term "employee" applies to all NRC technical staff who perform independent inspections or examinations at **licensee or applicant** facilities. The term "inspections" applies to inspections, examinations, audits, and reviews conducted by NRC technical staff at **licensee or applicant** facilities.

05.02 Observations

To assess the adequacy of program guidance (e.g., inspection procedures, tools, and resources) and verify the adequacy of employee performance, line managers must directly observe onsite activities. Those onsite observations should assess the adequacy of program guidance and the following individual performance attributes:

- a. safety perspective and the application of safety principles during onsite activities
- b. the adequacy of technical training and preparation for the onsite activity
- c. knowledge of applicable regulatory requirements, procedures and guidelines (e.g., 10 CFR, NRC Inspection Manual, inspection procedures, updated final safety analysis reports (UFSAR), Operator Licensing Examination Standards, NUREGs, regulatory guides, and industry codes and standards)
- d. adherence to agencywide regulatory positions and policies (e.g., backfit) and avoidance of personal interpretations and opinions.
- e. employee objectivity considering the employee's experience, technical expertise, site familiarity, industriousness, overall effectiveness, external and internal pressures, and differences of opinion based on valid technical merit
- f. employee demeanor, professionalism, and interpersonal skills (e.g., ability to communicate accurately and effectively with licensees)
- g. effective onsite activity techniques, including in part, evidence of good preparation, a performance-based focus, selection of risk-informed samples, emphasis on direct

observation of activities, use of in-depth probing where appropriate, and sufficient emphasis on independently verifying licensee provided information.

05.03 Site Visit Observation Form (NRC Form 649)

NRR regularly reports to the Commission the results of feedback from licensees on the impact of our activities [C1]. An important part of the report is an analysis of the feedback solicited by regional managers during periodic visits. The feedback obtained from licensees by regional managers must be forwarded to the NRR Division of Reactor Oversight (DRO), Performance Assessment Branch (IRAB). The feedback should be reported to IRAB on **NRC Form 649, "Site Visit Observation,"** which is available through the **NRC Forms Library (non-public)**. As noted on the form, the completed form can be emailed to FeedbackROP.resource@nrc.gov and/or a hard copy forwarded to the IRAB Branch Chief. Note that there is a "Submit Via Email" at the bottom of the form that will automatically forward your completed form to the appropriate email address.

A Site Visit Observation Form will be used to document ongoing and/or apparent, security or regulatory impact observations, made to Division or Regional Management during site visits that the senior manager believes should be included in the ROP annual assessment. **This form is not intended for routine feedback from licensees, only that which is deemed appropriate to include in an annual assessment of the ROP.** The specificity of comments should be adequate to convey the safety, security, or regulatory impact issue so that meaningful communications can occur; however, a detailed account of the issue is not required. Issues related to security should only be documented if they relate to regulatory impact issues. It is not intended that this Form document safeguards issues. It will include documentation of actions deemed appropriate by the regional administrator or deputy regional administrator.

0102-06 REFERENCES

IMC 1245 Appendix A, "Basic-Level Training and Qualification Journal"

END

Attachment 1: Revision History for IMC 0102

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	ML020730747 03/06/02 CN 02-008	Revised to consolidate requirements for observing licensing examiners from other operator licensing documents into this manual chapter. The requirement to document supervisory review of employees to specifically include the performance attributes listed in the manual chapter has been expanded. The requirement for quarterly phone calls to senior resident inspectors has been deleted. Also, other minor revisions to conform with the Reactor Oversight Process and to clarify language have been included.	N/A	N/A
N/A	ML052360373 08/22/05 CN 05-023	Revision history reviewed for last 4 years. Revised to incorporate best practices regarding roles and responsibilities for senior regional management site visits and also to emphasize that inspectors are not to track or trend minor findings.	N/A	N/A
N/A	ML12012A053 04/24/13 CN 13-012	IMC 0102 was changed to reflect current expectations on line management observation of NRC inspectors and improved routing of site visit observation forms.	N/A	N/A
C1	ML24190A049 03/18/25 CN 25-004	IMC 0102 was updated to the current IMC format and provided clarifications on requirements. C1 added to replace previous footnote: SRM, "SECY-91-172 Regulatory Impact Survey Report Final," dated December 20, 1991, required the staff to implement a process to gather feedback from licensees and to annually report the results of the process to the Commission. FBFs 0102-2218; -2282; -2308; -2436 were closed.	N/A	ML24194A093 ML18072A227 ML18072A217 ML22361A133 ML22364A305