

NRC INSPECTION MANUAL

IRIB

INSPECTION PROCEDURE 93800

AUGMENTED INSPECTION TEAM

Effective Date: **Upon Issuance**

PROGRAM APPLICABILITY: IMCs **2200**, 2201C, **2202B**, **2504C**, **2514**, 2515C, **2545**, **2561**, 2600B, 2690, 2800

93800-01 INSPECTION OBJECTIVE

- 01.01 Conduct a timely, thorough, and systematic inspection related to significant events at facilities licensed by the NRC.
- 01.02 Assess the health and safety significance of the event and communicate to regional and headquarters management the facts and safety or security concerns related to the event so that appropriate follow-up actions can be taken (e.g., study a generic concern; issue an information notice, bulletin, or issue a generic communication).
- 01.03 Collect, analyze, and document information and evidence sufficient to determine the cause(s), conditions, and circumstances pertaining to the event.

For reactors sites, an **augment inspection team** (AIT) is the event assessment response assigned by the NRC in accordance with Inspection Manual Chapter (IMC) 0309, "Reactive Inspection Decision Basis for Reactors." The **AIT conducts the** inspection based on this procedure and an inspection charter.

93800-02 INSPECTION REQUIREMENTS

Note: Management Directive (MD) 8.3, "NRC Incident Investigation Program," defines the authorities, responsibilities, and basic requirements for personnel investigating significant operational events. MD 8.3 also characterizes the differences between an AIT, **incident investigation team** (IIT), and a **special inspection** (SI).

02.01 AIT Leader

- a. Acts as the supervisor of the AIT.
- b. Reviews charter and supports its development as needed **in consultation with regional administrator (RA) or appropriate office director**.
- c. Forwards information on potentially generic safety questions (such as questions or concerns related to the design or licensing bases) to the **regional operating experience coordinators or the Office of Nuclear Reactor Regulation (NRR)**, Division of **Reactor Oversight (DRO)**, Operating Experience Branch (IOEB), or both when warranted.

- d. Conducts an entrance meeting with the licensee to discuss the purpose and scope of the AIT response and to **do the following**:
 - 1. Obtain the licensee's understanding of the event (including operator actions and the performance of safety systems).
 - 2. Request licensee assistance in scheduling interviews, obtaining information related to the event, and, if needed, assisting in inspection activities related to the event.
 - 3. **As appropriate, discuss the preservation and restoration of investigatory evidence, such as the quarantining of equipment in the "as found" post-event state for causal analysis and the process to release such equipment for restoration. A confirmatory action letter, in part, may be used to formalize an agreement in support of fact gathering and causal evaluation.**
- e. During the initial debrief, **does the following**:
 - 1. Provides a recommendation to the RA **or appropriate office director** as to whether the AIT inspection should continue, be upgraded to an IIT response, or be downgraded to an SI when sufficient information become available.
 - 2. When a **preliminary notification** (PN) is required, provides input to office and technical staffs so they can prepare and transmit a PN report to the RA for distribution. IMC 1120, "Preliminary Notifications," has criteria for issuing a written PN.
- f. As applicable, provides input to **the** office and technical staffs to prepare supplemental PN reports or daily notes, **or both**, when there is significant new information to report to keep management informed of significant facts, findings, and progress of the inspection.
- g. **When applicable, coordinates with Office of Public Affairs to provide the news media with information.**
- h. **In support of timely and effective inspection, requests additional support and resources to effectively implement the inspection charter authorized by the RA or appropriate office director and in consolation with appropriate internal and external stakeholders.**
- i. Manages the AIT effort in fact finding and analysis to meet the objectives of the AIT charter. Important information will include the details of what occurred during the event and the causes and contributing factors.
- j. Conducts an exit meeting with the licensee to **do the following**:
 - 1. Summarize the AIT inspection effort.
 - 2. As appropriate, discuss preliminary findings, **violations**, observations, or issues resulting from the AIT.
- k. Prepares a report for signature by the RA documenting the findings of the AIT. May direct the AIT members to remain together, either at the inspection site or at the **regional office**, to facilitate the preparation of the AIT report.

- I. Meets with regional management to discuss the AIT recommendation(s) for staff follow-up based on the findings of the AIT report and assists in coordinating the transfer of responsibility for follow-up actions.

02.02 AIT Members

- a. Report directly to the AIT leader.
- b. Conduct a timely, thorough, and systematic inspection of significant operational events at facilities licensed by the NRC, under the supervision of the AIT leader. In so doing, team members shall **do the following**:
 1. Assess the significance of the event under the guidance of the AIT leader.
 2. Collect, analyze, and document information and evidence as directed by the AIT leader.
 3. Evaluate the adequacy of licensee response to an event under the guidance of the AIT leader.
- c. Remain together after the inspection, at the discretion of the AIT leader, **to prepare** the AIT report.

93800-03 INSPECTION GUIDANCE

03.01 Scope

The following guidance should not be construed as limiting AIT authority to pursue all pertinent aspects of an event. However, safety **and security** (or regulatory) concerns raised that may or may not be directly related to the event under consideration should be reported to **headquarters, regional office** management, **or both**, for appropriate action.

- a. Promptly identify and convey generic safety concerns to the regional management and NRR/DRO/IOEB when appropriate, **which** will initiate follow-up actions. Recommendations for immediate follow-up actions, such as issuance of **operating experience smart samples, information notices, generic letters, or bulletins**, shall also be made through the normal organizational structure and procedures.
- b. Emphasize fact finding; **that is**, fully understanding the circumstances surrounding an event and probable cause(s), including conditions preceding the event, event chronology, systems response, equipment performance, event precursors; **and considerations of** human factors, quality assurance, radiological **exposure**, safeguards, **and safety culture components** (as defined in IMC 0310, "**Aspects Within the Cross-Cutting Areas.**" [C1] Determine whether the licensee had failed to adequately implement past operating experience including generic communications, such as **information notices, generic letters, and bulletins**.

- c. Base the fact-finding effort on the most timely, reliable evidential material, including interviews and other documented material related to the event previously obtained by internal audit or investigative groups. Inspectors should consider visiting vendor or contractor facilities, if necessary, to gather additional insights to verify licensee conclusions that are dependent on **information supplied by vendors or contractors**. The inspectors should consult with the Quality and Vendor **Inspection** Branch for additional guidance **before** visiting a vendor or contractor.
- d. It is not the responsibility of an AIT to **do the following**:
 - 1. Examine the regulatory process **during the inspection** (to determine whether that process contributed directly to the cause or course of the event). When the regulatory process appears to have contributed directly to the cause or course of the event, the AIT should submit feedback to the program office. IMC 0801, "Inspection Program Feedback Process" **describes the process**.
 - 2. Determine whether NRC rules or requirements were violated **and** recommend enforcement actions. **Inspectors may evaluate and document inspection findings provided that this does not interfere with fulfillment of the team's charter or substantially delay the issuance of the inspection report.**
 - 3. Evaluate risk significance of findings, using Significance Determination Process. It may be appropriate to document a pending finding, apparent violation, or unresolved item for inspector follow-up so as not to delay the inspection report.
 - 4. Address licensee actions related to plant restart.
 - 5. Address the applicability of generic safety or security concerns at other facilities.
- e. **For a medical event refer to MD 8.10, "NRC Assessment Program for a Medical Event or an Incident Occurring at a Medical Facility," for additional direction.**
- f. **For significant radiological events at reactor, fuel cycle, materials, or non-power utilization facilities, review IMC 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan," and IMC 1302, "Follow-up Actions and Action Levels for Radiation Exposures Associated with Materials Incidents Involving Members of the Public" for additional guidance.**
- g. **AIT members should ensure the issuance of the augmented inspection report is not substantially delayed in order to assess the significance or severity of findings or violations. In some cases, it may be appropriate to document a pending finding, apparent violation, or unresolved item for inspector follow-up so that the facts and causes of the event can be communicated promptly.**

03.02 Schedule

An AIT should begin as soon as practicable after the facility has been placed in a safe, secure, and stable condition.

03.03 Communications

When the chronology and circumstances of the event are more clearly understood, the AIT leader is encouraged to maintain communications with cognizant personnel from the regional office, NRR, NMSS, or NSIR as appropriate to do the following:

- a. Provide a firsthand update of the event.
- b. Respond to any questions.
- c. Discuss the appropriateness of the AIT response.

03.04 Qualifications

The AIT Leader should (although is not required to) have completed training course G-605, "Reactive Inspection Leadership Training," and should typically be either a non-Senior Executive Service manager or a qualified team leader.

03.05 Resources

The resources applied to an AIT are based on the agency's understanding of the event, its complexity, the significance attributed to it, and the uncertainties and influential assumptions involved in assessing the significance.

03.06 Inspection Team

Technical experts from the responsible regional office are comparable for SIs and AITs, but AITs (unlike SIs) are usually augmented by personnel from headquarters, other regions, or contractors with special technical qualifications. Incident Response Manual Chapter (IRMC) 300, "Incident Investigation," outlines the procedures for using non-Government individuals.

03.07 Documentation

IMC 0611 Attachment 2, "Guidance for Reactive Inspection Report Documentation," contains specific documentation guidance for SI and AIT inspections.

03.08 Recommendations

After meeting and consulting with management as described in Section 02.01I of this inspection procedure, document any actions related to reducing the frequency or in the prevention of similar significant events in a memorandum addressed to the RA, office director, project manager, and NRR/DRO/IOEB, as appropriate.

93800-04 RESOURCES ESTIMATES

The resources required to complete this inspection are highly variable and dependent on the circumstances involved. Therefore, no specific resource estimates are provided.

93800-05 PROCEDURE COMPLETION

This procedure is considered complete when the inspection and charter objectives have been met and the final inspection report has been issued.

93800-06 REFERENCES

MD 8.2, "NRC Incident Response Program"

MD 8.3, "NRC Incident Investigation Program"

MD 8.10, "NRC Assessment Program for a Medical Event or an Incident Occurring at a Medical Facility"

IRMC 300, "Incident Investigation"

IMC 0310, "Aspects Within the Cross-Cutting Areas"

IMC 0309, "Reactive Inspection Decision Basis for Reactors"

IMC 0609, "Significance Determination Process"

IMC 0611 Attachment 2, "Guidance for Reactive Inspection Reports"

IMC 0801, "Inspection Program Feedback Process"

IMC 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan"

IMC 1302, "Follow-up Actions and Action Levels for Radiation Exposures Associated with Materials Incidents Involving Members of the Public"

IMC 2523, "NRC Application of the Reactor Operating Experience Program in NRC Oversight Processes"

IMC 2601, "Reactive Inspection Decision Making Process for Fuel Facilities."

IP 93812, "Special Inspection"

END

Attachment 1: Revision History for Inspection Procedure 93800

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	01/14/88 CN 88-001	Initial issuance. Revision history reviewed for the last 4 years.	N/A	N/A
N/A	07/05/89 CN 89-012	Revision	N/A	N/A
N/A	12/11/98 CN 98-019	Revised to include lessons learned from an inspection at Washington Nuclear Project-2 regarding the assignment of team members to the augmented inspection team (AIT), in addition to minor editorial changes.	None	N/A
N/A	08/02/99 CN 99-012	Revised to include the requirement to provide an executive summary in plain English in the inspection report generated by this procedure. This revision was made in response to SECY-99-070, "Implementation Plan for the Public Communications Initiative (DSI-14)."	None	N/A
N/A	04/03/00 CN 00-003	Modified to be performed as a supplemental procedure (Appendix B).	None	N/A
N/A	ML023020552 10/23/02 CN 02-039	Revised to provide guidance on documenting information relating to events that is in addition to that currently required by IMC 0612, "Power Reactor Inspection Reports," such as description/chronology, risk-significance, and probable contributing causes.	None	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
C1	ML061560511 06/22/06 CN-06-015	Incorporate safety culture into inspection procedures. "Staff Requirements - SECY-04-0111 - Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture" August 30, 2004	Inspector training on use of safety culture in the ROP.	ML061570132
N/A	ML071920281 07/18/07 CN 07-022	Revised to consider licensee implementation of Information Notices, Generic Letters, and Bulletins.	None	N/A
N/A	ML073390041 02/12/08 CN 08-007	Guidance on resources for follow up to AITs	None	ML080250272
N/A	ML081230523 07/25/08 CN 08-020	Guidance for recommending improvements to reactor oversight process baseline inspection procedures based on lessons learned from the AIT.	None	N/A
N/A	ML083370396 03/23/09 CN 09-010	Evaluate whether event and its causes indicate gaps in ROP baseline inspection procedures.	None	ML090400970
N/A	ML17269A044 11/15/17 CN 17-025	Amended 02.01.b and 03.02.b. text to clarify details regarding charter. Closed FF 93800-1839	None	93800-1839 ML17319A912

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	ML18276A286 04/02/19 CN 19-012	Relocated documentation guidance into the new IMC 0611 Attachment 2, "Guidance for Document Reactive Inspections." Addressed numerous minor issues identified in FBF 93812-1772.	None	ML18331A289 93812-1772 ML18303A202 ML18303A203
	ML22102A130 06/07/22 CN 22-012	Revised to include guidance that is being relocated from the handbook for MD 8.3. Specifically, qualifications, scheduling, coordination with Office of Public Affairs, evidence preservation, and equipment quarantine.	None	ML22104A259