
INSPECTION PROCEDURE 88201 APPENDIX F

INCIDENT INVESTIGATIONS

Effective Date: June 20, 2025

PROGRAM APPLICABILITY: IMC 2600, 2694

88201.F-01 INSPECTION OBJECTIVES

- 01.01 To determine if the applicant or licensee has adequately established and is implementing an incident investigations program for investigating abnormal events and completing appropriate corrective actions.
- 01.02 To determine if the applicant's or licensee's incident investigations program is adequately coordinated and integrated with other management measures.

88201.F-02 INSPECTION REQUIREMENTS

This inspection procedure (IP) is intended to provide inspection requirements and guidance applicable to a wide variety of potential construction projects at both existing and new fuel cycle facilities. These projects may vary greatly in scope, complexity, and risk to public health and safety. As a result, not all sections, or subsections, of this appendix may be applicable or implemented at a specific facility. Recommended inspection scope and hours for a specific new fuel cycle facility will be documented in the principal inspection plan (PIP) for that facility developed in accordance with Inspection Manual Chapter (IMC) 2694, "Fuel Cycle Facility Construction and Pre-Operational Readiness Review Inspection Program." Additionally, this appendix can be used to provide additional management measures inspection guidance for plant modification inspections at existing facilities but is not required to be implemented for these projects. Use of this appendix or sections of this appendix for modifications at existing fuel cycle facilities, would be done on a case-by-case basis, in accordance with IMC 2600, Appendix B, "NRC Core Inspection Requirements."

02.01 Incident Investigation Program

Determine if the applicant or licensee has established and is implementing a formal process to investigate abnormal events that may occur during operation of the facility to determine their specific or generic root cause(s), generic implications, and risk significance; to recommend corrective actions; and to report to the NRC as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 70.50, "Reporting Requirements," and 10 CFR 70.74, "Additional Reporting Requirements."

02.02 Corrective Actions

Determine if the applicant or licensee has identified and implemented corrective actions resulting from abnormal event investigations in a timely manner.

02.03 Incident Investigation Documentation

Determine if the applicant or licensee is maintaining documentation associated with abnormal events in accordance with the incident investigations program.

88201.F-03 INSPECTION GUIDANCE

General Guidance

- a. Applicants or licensees choosing to apply a graded system of management measures for incident investigation activities must describe the elements of incident investigations that will be applied in a graded manner to items relied on for safety (IROFS) based on their safety significance. Because it is important to investigate abnormal events occurring at a licensed facility to ensure that reporting requirements are met and public health and safety is ensured, no detailed guidance is provided on grading incident investigation activities. Rather, the management measures program should take into account risk significance of an incident as part of the investigation process, thereby providing a means of grading the incident investigation process in relation to the IROFS significance.
- b. IP 88075, "Event Follow-Up," provides guidance for evaluating licensee events and degraded conditions to provide input in determining the need for an Incident Investigation Team (IIT), Augmented Inspection Team (AIT), Special Inspection Team (SIT), or other reactive inspection. Inspectors should review and implement IP 88075 as needed.

Specific Guidance

03.01 Incident Investigation Program (Inspection Requirement 02.01)

No specific guidance.

03.02 Corrective Actions (Inspection Requirement 02.02)

Corrective actions may be applied to IROFS in a graded manner and prioritized commensurate with the safety significance of the IROFS and the adverse condition. The applicant's or licensee's corrective action program or process should result in the prompt identification of conditions adverse to quality, regardless of the IROFS significance, in accordance with 10 CFR 70.62. The correction of adverse conditions may be graded to allow the application of corrective actions in a timeframe commensurate with the significance of the IROFS to safety. Documentation associated with corrective actions should be sufficiently detailed to describe the condition(s) and action(s) taken to enable appropriate follow-up, regardless of significance.

03.03 Incident Investigation Documentation (Inspection Requirement 02.03)

The applicant or licensee should maintain documentation related to abnormal events for the life of the operation so that "lessons learned" may be applied to future operations of the facility. Details of the event sequence should be compared with accident sequences already considered in the integrated safety analysis (ISA), and the ISA summary should be modified to include evaluation of the risk associated with accidents of the type actually experienced.

88201.F-04 RESOURCE ESTIMATE

The resource estimate for completing this appendix is dependent on the specific facility and will be as determined in the PIP for the facility. Details on the resource estimates are identified in IP 88201, Section 04, "Resource Estimate."

88201.F-05 PROCEDURE COMPLETION

Procedure completion is dependent on the specific facility and will be as determined in the PIP for the facility.

88201.F-06 REFERENCES

NUREG-1520, "Standard Review Plan for Fuel Cycle Facilities License Applications," Rev. 2
IP 88075, "Event Follow-Up"

END

List of Attachments:

Attachment 1: Revision History for IP 88201 Appendix F

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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)
	ML25010A403 06/20/25 CN 25-018	Initial issuance. Initial Issue to provide guidance for the Management Measures inspections of Fuel Facilities licensed under Part 70.	N/A	N/A