MANUAL CHAPTER 0040

PREPARING, REVISING, AND ISSUING DOCUMENTS FOR THE NRC INSPECTION MANUAL

0040-01 PURPOSES

01.01 To establish the format and basic requirements for preparing and obtaining comments on the following NRC Inspection Manual documents: chapters, inspection procedures, 10 CFR guidance, technical guidance, temporary instructions, and change notices.

01.02 To show how to prepare appendixes, tables, figures, and other material for manual documents.

01.03 To specify the responsibilities and authorities for preparing, issuing, and revising the NRC Inspection Manual.

01.04 To establish the process for determining whether to change the operating reactor risk-informed baseline inspection program.

0040-02 OBJECTIVES

02.01 To help managers and writers in planning and developing clear, accurate, and effective manual documents.

02.02 To ensure consistency in the format and content of manual documents.

02.03 To ensure that changes to the risk-informed baseline inspection program are consistent with the reactor oversight framework and the goals and objectives of the reactor inspection program.

0040-03 DEFINITIONS

03.01 General

a. Document. A manual chapter, inspection procedure, 10 CFR guidance, technical guidance, temporary instruction, or change notice.

b. Manual Part. A major subject area into which the manual is divided. Each part of the manual is subdivided into areas such as inspection manual chapters, inspection procedures, and guidance.

c. NRC Inspection Manual. The compilation of documents that define the policies, procedures, and programs for conducting inspections.

03.02 Types of Inspection Manual Documents

a. Table of Contents. An outline of the manual's structure and a numerical listing of the manual documents. (Certain document numbers and titles are reserved for future development.)

b. Inspection Manual Chapter (IMC). A document containing written administrative or inspection program statements of policy. A manual chapter for an inspection program defines the program through a listing of inspection procedures, which is normally appended to the manual chapter.

c. Inspection Procedure (IP). A statement of requirements and guidance for inspection activities, which are focused on safety.

d. Temporary Instruction (TI). A temporary inspection procedure focused on current safety issues or concerns. TIs are issued to supplement an inspection program and are generally in effect for 12 months, but not longer than 24 months. TI requirements in effect for more than 24 months need special justification. TI requirements are mandatory. TIs are issued by a change notice and are printed on blue paper for easy identification in the manual.

e. Change Notice (CN). A transmittal document that lists new, revised, and deleted manual documents, distributes the new and revised documents, and includes information on updating and maintaining the manual. Any special training required to perform an inspection procedure or TI is stated in the change notice in the Remarks section.

f. Technical Guidance. In implementing an inspection program, an NRC regional office may have a technical question that requires more guidance than is given by or referenced in an inspection procedure. If the requested guidance has nation-wide applicability, it is the responsibility of whoever issues the guidance to ensure that it is included in the manual. Technical guidance documents are in Part 9900 of the manual.

g. 10 CFR Guidance. A guidance document on acceptable approaches to particular issues involving rules and regulations in Part 10 of the Code of Federal Regulations (CFR). These guidance documents are also found in Part 9900 of the manual.

03.03 Parts of Inspection Manual Documents

a. Appendix. A supplement that contains instructional material, either mandatory or discretionary, that is relevant to a document but is too detailed or extensive to be included directly in the body of the document.

b. Attachment. Material at the back of the document (an appendix, a figure, a table, or any supplementary material that will help the user).

c. Exhibit. An example of format requirements with accompanying instructions.

d. Figure. Graphical material.

e. Table. Information presented compactly in column and rows.

0040-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Originating Organizations. Each program document identifies the originating organization with the organization's code against the right margin of the first page above the title.

a. Prepare the final draft of the documents. The use of contractors in developing inspection program documents is limited to defining inspection requirements and guidance important to safety that can be accomplished within the time allotted for the inspection. A contractor typically produces a report, which the originating organization then uses to prepare the manual document. NRR contracts for inspection program development must have the concurrence of the Inspection Program Branch (IIPB) before they are placed.

b. Develop manual documents necessary to carry out assigned organizational programmatic responsibilities and, in conjunction with the Inspection Programs Branch Training Coordinator, identify any training needs associated with carrying out the responsibilities. The originating organization sends to the Manual Coordinator, IIPB, a draft proposal for a new or revised document. If the proposed inspection activity would increase direct inspection hours or FTE currently allotted to an established program (such as the risk-informed baseline inspection program, IMC 2515, Appendix A), NRR or NMSS management approval is required. The source of any new inspection hours must be clearly stated (i.e., headquarters, region). Appendix A to this manual chapter describes the process for revising the risk-informed baseline inspection program.

c. Ensure that continuing NRC policies, criteria, and procedures are incorporated in the manual (see Inspection Manual Chapter 0030).

d. Ensure that all program documents conform with Inspection Manual Chapter 0308, "Reactor Oversight Process Basis Document."

e. Ensure appropriate participation of other program office organizations, NRC regional offices, and NRC offices in developing manual documents.

f. Ensure consistent and proper punctuation, capitalization, spelling, grammar, and format. As for all NRC documents, the usage and editorial style are based on the Government Printing Office Style Manual (latest edition), the NRC Editorial Style Guide (NUREG-1379), and Webster's dictionary (latest edition). The originating office sends the manual document to a technical editor, whose service is documented on Exhibit 1, "Document Issuing Form."

g. Send to the IIPB Manual Coordinator one paper copy and one electronic copy of documents that have been prepared in accordance with the instructions in this manual chapter and are ready to be issued. The electronic copy is a Corel WordPerfect file and may be sent by electronic mail or by referencing the ADAMS accession number.

h. Arrange for inspectors to get any specialized training required to perform the IP or TI requirements beyond the basic training for inspectors (specified in IMC 1245, "Inspector Qualifications"). For significant revisions or initial issuance of documents, the originating organization coordinates specialized training with the Technical Training Division to determine which organization is best suited to provide the training. For revisions where training such as a Read and Sign or a detailed Change Notice may be more appropriate, the originating organization develops the technical content of the training and provides it to the Inspection Program Branch

Training Coordinator in electronic and hardcopy format. Specialized training requirements are to be stated in the IP or TI and summarized in the change notice. If necessary, the effective dates of documents should accommodate required training periods.

i. Provide guidance on following up and closing TIs, including regional responsibilities. Clearly distinguish mandatory requirements from those that are optional. Review and analyze TI results, giving feedback to the regions, IIPB and the Director, NRR, for reactor inspection program, or Director, NMSS for nonreactor inspection programs and determine whether additional inspection is needed. Submit a document issuing form (Exhibit 1) to IIPB to delete TIs when they are completed.

j. Triennially review inspection manual documents to determine whether they should be revised or deleted. The originating or assigned office is responsible for maintaining and updating inspection documents.

k. Obtaining approval before asking the regions to review and comment on new and revised manual documents.

1. Operating reactor inspection program: the approval of Chief, Inspection Program Branch.

2. Other inspection programs: director of division responsible for the inspection program.

04.02 Reactor Inspection Programs: Director, Division of Inspection Program Management (DIPM)

a. Coordinates inspection policies, programs, and guidance for nuclear reactors.

b. Ensures that the reactor inspection program uses NRC resources effectively and focuses on matters important to ensuring nuclear safety.

c. Initiates studies to ensure that the four NRC regions are consistently implementing the inspection programs.

d. Approves documents necessary to carry out assigned program functions.

04.03 Reactor Inspection Programs: Director, Division of Regulatory Improvement Programs. Concurs on the document issuing form for all reactor inspection temporary instructions pertaining to NRC bulletins and generic letters. Manages technical support for developing new or revised manual documents for the reactor inspection programs.

04.04 Reactor Inspection Programs: Chief, Inspection Program Branch, DIPM

a. Develops the reactor inspection program and evaluates its implementation, and assures the integration of inspection and licensing program activities.

b. Manages the development of temporary instructions and manual changes.

c. Reviews regional procedures and initiatives for possible incorporation into the reactor inspection program.

d. Ensures that all inspection program documents conform with NRC policies.

e. Ensures that all program documents conform with the ROP Basis Document.

f. Approves and signs requests for regional comments on documents related to the reactor inspection program.

g. Approves for issuance all change notices for NRR inspection program documents.

h. Monitors all requests for regional comments on inspection program documents to ensure that the comment workload is evenly distributed.

i. Coordinates all specialized training needs for power reactor inspections. This includes working with the originating organization to determine if training is needed and what training would be appropriate, assisting the originating organization in developing the training, coordinating the dissemination of the training material to the inspectors, and tracking who has completed the training, if tracking is required.

j. Inform inspectors and provide any training before issuing the procedure. To ensure that procedures are issued in a timely fashion, communication methods other than face-to-face instruction will be used whenever possible. This may include more detailed change summaries, scheduled conference calls for Q&A sessions, and web-based training.

04.05 Nonreactor Inspection Programs: Responsible NMSS Manager. Division director or designee approves documents necessary to carry out assigned program functions. Sends change notice package to Chief, IIPB to be issued.

04.06 Nonreactor Inspection Programs: Responsible NMSS Branch Chief. Approves and signs requests for regional comments on documents related to nonreactor inspection programs.

04.07 Manual Coordinator, IIPB

a. Ensures that the appropriate NRR organizations, NRC regional offices, and other NRC offices have been given the opportunity to participate in developing manual documents for the reactor inspection programs.

b. Checks that the requirements of this manual chapter are met in the preparation and approval of manual documents.

c. Updates the Inspection Procedure Authority File of NRR's Reactor Program System (RPS/IPAS).

d. Reviews or coordinates review of manual documents for conformance with NRC policies.

e. Assures availability of inspection program documents through ADAMS and the NRC's Web site.

0040-05 GENERAL REQUIREMENTS

05.01 Document Numbering System. The manual is divided into 100 parts numbered 0000 through 9900 (0000 is the first part, 0100 is the second part, etc.). Manual documents within the parts have 4-digit numbers (manual chapters), 5-digit numbers (inspection procedures and guidance documents), or 7-digit numbers (temporary instructions).

a. Manual chapters numbered 0000 through 1999 are used for policy statements on the inspection programs and the manual. Inspection Manual Chapters 2000 through 2999 define the various inspection programs.

The first two digits of a manual chapter number identify the administrative or inspection category, and the last two digits identify the inspection program. For example, the first two digits of IMC 2515 identify the inspection program (reactor), the third digit identifies the type of reactor (light water), and the fourth digit identifies the operational phase (operations)—"Light Water Reactor Inspection Program - Operations Phase."

b. Inspection procedures (IPs) are subdivisions of Parts 3000-9800 of the manual and are identified by 5-digit numbers. For example, the first two digits of IP 35003, "Quality Assurance Manual Review," identify the part of the manual (quality assurance), and the 003 is the number of the procedure in the sequence of procedures in Part 3500. See Section 0040-06.04b, below for more information on numbering IP's for the risk-informed baseline inspection program.

c. Temporary instructions (TIs) are issued with a number that includes the number of the manual chapter with which the TI is associated followed by a sequence number. Thus, TI 2515/102 is the 102nd TI issued under the operating phase of the light water reactor inspection program (IMC 2515).

d. There are two types of technical guidance in Part 9900: technical guidance and 10 CFR guidance. Each category is subdivided into topics (e.g., industry standards or specific rules). Topics are not numbered. Guidance not associated with any of the topics have a 5-digit number (e.g., 99100).

e. Change notices are issued with a year and a sequential notice number (e.g., Change Notice 95-013).

05.02 Terminology

a. Terminology must be consistent. Do not use two or more words for the same idea, concept, or activity. Except for abbreviations in common use, show the complete word, title, or phrase the first time it is used with the abbreviation in parenthesis immediately after, for example, service water system operational performance inspection (SWSOPI).

b. The originator must make clear what is mandatory on inspectors and what is discretionary, for example, by using auxiliary verbs "must," "shall," and "will" to indicate mandatory requirements and "can," "may," "might," and "should" to convey discretion.

05.03 Revisions to Documents. When manual documents are revised, the entire document is reissued. Changes must be identified by placing a vertical line in the margins of the document next to the revision by using WordPerfect's alternating margin option of the redline feature. Revisions are issued by a change notice. Major changes to the document should be noted in the Remarks section of the change notice (see Exhibit 8).

Major changes to the procedures of the risk-informed baseline inspection program (IMC 2515, Appendix A) must have been approved through the process described in Appendix A. Responsibilities and guidance for changing the various significance determination processes (SDPs) or adding new SDPs to the reactor inspection program are given in IMC 0609, "Significance Determination Process."

There are instances when specific inspection requirements are placed in an inspection procedure to satisfy a generic requirement (e.g. identified in a Generic Letter or Bulletin). To ensure that generic inspection requirements are not inadvertently deleted through a revision to a procedure, a review of change notices that issued revisions to the procedure for the past 4 years should be performed. Change Notices are located on the external NRR Web Page.

05.04 References. References should be directly relevant to the IP and essential to its completion. References should not be used simply to convey historical information. References to another inspection program document must include the type of document, the number, and the section or appendix (e.g., IMC 2500-05.01; IMC 2500, Appendix A). References to another section of the same document should state so (e.g., Section 04.01 of this IMC).

05.05 Plain Writing Guidance. State clearly what the inspector is to do. Use active verbs to require action and active voice to clearly identify the actor. Use specific, objective, unemotional, concrete words. State who, when, where, and why. State conditions, limitations, and exceptions separately. Write in a readable style in simple English. It is not just desirable for an inspector to understand your writing, it is mandatory.

a. Use short words, short sentences, and short paragraphs. Try to use sentences of 15 words or less. Eliminate unnecessary words or phrases. If possible, avoid words that are not in common use outside of the NRC (the documents are publically available). Divide long-drawn-out sentences into two or more sentences. If this not practical, do not use two long sentences immediately following each other. Try to limit paragraphs to 10 lines or less. Reorganize material to break lengthy, complex paragraphs into several paragraphs or a list.

b. Read and edit draft material from the user's perspective. If you can simplify it, do so. Complex words and phrases can confuse the meaning. For almost every long word, there is a short replacement. Change clauses to phrases; change long phrases to short ones. Replace wordy prepositions ("in the vicinity of") with one-word prepositions ("near").

   Keep modifiers next to the words they modify. Keep the main verb near its subject and object.

c. For further guidance, refer to NUREG-1379, "NRC Editorial Style Guide," and the Government Printing Office Style Manual (latest edition).

05.06 Word Processing Software. All drafts of documents should be prepared, and the final version must be prepared in the current version of WordPerfect and the IMC Format. All graphic material and exhibits that are not part of the document's WordPerfect file must also be prepared in WordPerfect. IIPB must be given both a paper copy of the document and the electronic files (either on a diskette or sent by e-mail).

05.07 Incorporating Other Documents. Documents from the NRC or other agencies are incorporated into manual documents only as necessary to conduct the inspection program.

05.08 Change Memoranda. Ordinarily, memoranda should not be used to change or clarify policies, practices, or procedures in the manual. On rare occasions a memorandum may be used to expedite information to the regions. The memorandum needs to be concurred in by the Chief, IIPB, for reactor program documents or the responsible NMSS manager for nonreactor program documents, and then the originating organization must change the manual as quickly as possible.

05.09 Requests for Guidance, Revisions, and New Documents. Requests for guidance on documents in the manual and suggestions for document revisions or new documents should be addressed to the Chief, IIPB/DIPM/NRR for reactor inspection programs, or the responsible NMSS manager for nonreactor inspection programs. When the responsible organization begins revising a manual chapter or another manual document, it should retrieve the WordPerfect version of the document from the NRC Internal Web site and save it as a separate working file, or get the file from the Manual Coordinator, IIPB, who maintains the agency's official record copy of manual documents.

0040-06 PREPARING NEW OR REVISING MANUAL DOCUMENTS

All program documents must conform with Inspection Manual Chapter 0308, "Reactor Oversight Process Basis Document." If changes or revisions alter the scope or basis of a program document, appropriate updates to the ROP Basis Document are required. Once the need for a basis change is recognized, the appropriate changes to the ROP Basis Document should be drafted and approved as part of the document approval and issuing process.

Since Web links can change, the insertion of a Web link in a document is not recommended and should not be used.

To assure uniformity and consistency, new or revised manual documents must follow the format requirements given in this manual chapter.

06.01 Document Format. Every document prepared for the manual should be in Arial font 12-point, fully justified. A WordPerfect template and style of the correct format (manual format), can be obtained from the Manual Coordinator. Do not use bold, italic, shadow, or other appearances. Underline may be used for emphasis. Follow the examples of Exhibits 3–9 of this manual chapter. The Manual Coordinator will remove all non-standard formats and verify the tab settings and the justification.

06.02 Numbering of Manual Documents. Revisions of manual documents have the same number as the original document. New manual documents use X's for the document number (IP XXXXX) and for the issue date (02/02/04). The IIPB Manual Coordinator will add the number and the date when the document is issued.

TI's are the only manual document that use revision numbers. Revisions of other manual documents are indicated only by the new issue date.

06.03 Inspection Manual Chapters (IMCs). IMCs state the purpose, objectives (or policy), definitions, responsibilities, authorities, and basic requirements for inspection programs. Detailed instructional material may be put in an appendix (see Section 06.08, below). Chapter format and content are shown in Exhibit 3.

06.04 Inspection Procedures (IPs). IPs describe the activities to be performed by an inspector, including administrative requirements. IPs identify the applicable program, state the objective of the inspection, list the inspection requirements, give inspection guidance, and estimate the resources needed.

a. Each IP contains the first four sections discussed below (see Exhibit 4 for format).

   Section 01, "Inspection Objective(s)". States the objective(s) of the IP.

   Section 02, "Inspection Requirement(s)". Describes the requirements for completing this procedure and achieving its objectives. This section may specify

systems, components, and records to be inspected. This section may also specify inspection methods such as sampling (including sample sizes), observation, records review, and interviews. The IP should not involve excessive reviews of documents. Some auditing of documents (e.g., reports, analyses) may be necessary, but the emphasis should be on inspecting equipment and observing licensee activities (see Exhibit 4).

Section 03, "Inspection Guidance". This section may offer general as well as specific guidance on inspection requirements. Specific guidance is intended to directly help the inspector in performing the requirements stated in Section 02 of the procedure. It explains how individual requirements can be accomplished and alerts the inspector to potential problems. For new procedures, the guidance section can be used to tell the inspector how the originating office intended the requirements to be accomplished. For existing procedures, the guidance should reflect experience gained or problems encountered in performing the inspection. Guidance is advisory not mandatory. If no guidance is given for a requirement, use the phrase "No inspection guidance." See Exhibit 4 for instructions on numbering and paragraphing this section.

Section 04, "Resource Estimate". An estimate of the average time needed to complete the inspection (not including preparation and documentation time). This estimate is for broad resource planning and is not intended as a measure for judging the inspector's or the region's performance. Actual inspections may require substantially more or less time, depending on the circumstances.

The originating organization is responsible for estimating the needed resources. To be realistic, estimates must include regional perspectives. Therefore, in the request-for-regional-comments memorandum (Exhibit 10), the regions are asked to make a resource estimate or to comment on the proposed estimate. See Section 0040-07, below.

Section 05, "References". Lists documents that will be immediately helpful to the inspector in performing the inspection procedure. If documents have been fully referenced in the text, this section may be omitted. The last item in references to NRC documents is the ADAMS accession number (e.g., ML003717333). Regulatory guides and industry standards and codes do not need an ADAMS accession number.

The reference section is not intended to be a historical listing of documents about the inspection area. It should be limited to no more than 12 documents. List only those references directly relevant to performing the procedure. Manual documents should not reference documents, policies, or practices of the Institute of Nuclear Power Operations (INPO).

b. Procedures for the risk-informed baseline inspection program for reactors may include requirements and guidance in attachments to the procedures. For this program, the attachments correspond to "inspectable areas" within the "cornerstones of safety" that form the foundation of the Reactor Oversight Process (see IMC 2515). Baseline inspection procedure attachments are numbered by a 2-place decimal after the procedure number (e.g., 71111.21). See Exhibit 4 for an example of how to format baseline program procedures and their attachments.

06.05 Temporary Instructions (TIs). A TI has the same force as an IP but is used for a once-only or initial inspection of a safety issue, or a one-time collection of information. It is usually in effect for 12 months but never longer than 24 months. If a TI will be in effect for more than 24 months, the originator must provide a special justification. A TI is always

issued by a change notice (not by memorandum). Although TIs are temporary, they may require follow up inspections.

Each TI has an expected-completion date and an expiration date. If the stated purpose of the TI has not been accomplished by the expiration date, the originating organization may revise the TI and reissue it. The revised TI must be accompanied by a document issuing form (Exhibit 1) and for reactor inspection programs a memorandum to IIPB justifying the re-issuance.

a. TIs have the same sections as inspection procedures, plus some sections particular to TIs. See Exhibit 5 for more details on format and section requirements for TIs.

   Section 01, "Objectives". This section states whether the TI is being issued only for information-gathering purposes. An information-gathering TI must be accompanied by a memorandum of justification to IIPB stating why the information is needed, what will be done with it, and why it cannot be obtained by other means.

   The Objectives section also states if the TI is being issued to verify licensee responses to a generic letter or bulletin and, if so, affirms that the TI requirements are strictly confined to verifying the information requested by the generic letter or bulletin.

   Section 04, "Requirements". TIs emphasize observing activities, not reviewing documents. TI requirements should be performance based, clearly stated, and focused on the implementation of programs and procedures.

   A TI based on safety evaluation reports (SERs) should state whether the SERs are available. If the SERs have not all been issued, the TI should state when the remaining SERs will be issued.

b. The following sections are particular to TIs:

   Section 02, "Applicability". This section states which facilities or classes of facilities, or how many facilities (e.g., two in each region) will be inspected using the TI.

   Section 03, "Background". This section explains the reasons for issuing the TI.

   Section 06, "Reporting Requirements". TI results typically are documented in inspection reports, and the TI must specify the information to be documented. This section tells where the inspection results will be documented if not in a routine inspection report and specifies any non-standard distribution of reports documenting the TI inspections.

   Section 07, "Completion Schedule". A TI should include an expected date for completion of the inspection. This date should be reasonable and should generally precede the expiration date of the TI.

   Section 08, "Expiration". This section states the effective duration of the TI. It is typically 12 months from the issue date. Longer periods or extensions must be justified to IIPB.

   Section 09, "Contact". This section gives the name and phone number of a technical contact (and the lead project manager, if one is assigned) to answer questions about the TI.

Section 10, "Statistical Data Reporting". This section identifies the charge codes for the TI and, if necessary, the inspection procedure and code to which an inspector should charge time for any follow-up inspections after the TI has been completed.

Section 11, "Originating Organization Information". This section identifies the organization responsible for the technical content of the TI, lists any special training needed to complete the inspection requirements identified by the TI, and gives the estimate of the average time needed to complete the inspection.

c. TIs have the same number as the manual chapter to which they belong. For example, TI 2515/011 is the 11th temporary instruction issued for IMC 2515.

d. When the originating organization determines that the stated purpose of the TI has been accomplished, it prepares a final report. The report documents the information obtained and the conclusions reached from reviewing the inspection results. The report may also recommend additional inspections or changes to the inspection program. The originating organization sends the final report to the regions, IIPB and the Director, NRR for reactor inspection programs, or Director, NMSS for nonreactor inspection programs within 90 days of the expiration date of the TI.

06.06 Technical Guidance and 10 CFR Guidance Documents. Part 9900 of the manual is used to rapidly communicate technical guidance to the regions. A technical guidance document is distributed by change notice. The regions should review the document and ensure that inspectors are aware of it. Technical guidance documents directly applicable to licensee activities covered by program inspection procedures are incorporated into the procedures during their next revision or periodic review. The organizational unit responsible for the manual document is responsible for updating the inspection procedures. The guidance is reviewed every 3 years to determine if it should be revised or deleted.

a. Part 9900 is reserved for guidance documents on Title 10 of the Code of Federal Regulations (10 CFR) and on subjects that have broad applicability to inspection programs. Guidance specific to one procedure or to a few procedures should be included in Section 03 of those procedures, rather than in Part 9900.

b. Documents containing 10 CFR guidance are filed sequentially in Part 9900 after the tab with the corresponding 10 CFR regulation number.

c. Documents containing technical guidance are filed in Part 9900 under the appropriate industry standard or NRC topic. The topics include NRC regulatory guides, standard technical specifications, standard review plans, and major areas of plant operations.

d. Documents containing 10 CFR guidance and technical guidance must be prepared in the format shown in Exhibits 6 and 7, respectively.

06.07 Change Notices (CNs). CNs list documents issued, revised, superseded, and deleted; indicate distribution; and give other information on the updating, maintenance, and new training requirements of the manual. (See Exhibit 8 for change notice format and content.)

06.08 Appendix. An appendix may contain additional instructional material, either mandatory or discretionary. Appendixes must pertain to the manual chapter, inspection procedure, or temporary instruction to which they are appended; they should not contain

policies, responsibilities, or requirements, which are to be covered in the basic document. (See Exhibit 9 for format and content.)

06.09 Table. Every table should have a number (Table 1, 2, etc.) and should be cited in the text by that number. In general, tables should have titles. Contact the Manual Coordinator, IIPB, DIPM, for more details and guidance.

06.10 Figure. Every figure should have a number (Figure 1, 2, etc.) and should be cited in the text by that number. In general, figures should have titles. The NRC Graphic Services Section is available to prepare figures.

06.11 Exhibit. Every exhibit should be numbered (Exhibit 1, 2, etc.) and should be cited in the text by that number. For guidance see the exhibits attached to this document.

06.12 Landscape Pages. Sometimes a table or form is too wide to be typed in the "portrait" orientation (with the lines of text parallel to the short edge of the paper). In that case the material is presented in the "landscape" orientation (with the lines of text parallel to the long edge of paper). This increases the width from about 6-1/2 to 9 inches. For further guidance, contact the Manual Coordinator, IIPB.

06.13 Issue Date. The issue date is on each page of each document in the form 02/02/04. The actual date will be entered by the Manual Coordinator before the document is sent to the printer. The issue date is placed on the lower left of every odd-numbered page and on the lower right of every even-numbered page (as illustrated in this manual chapter).

06.14 Document Number. The document number is put at the bottom of the second and all subsequent pages of a document—at the bottom right of odd-numbered pages and at the bottom left of even-numbered pages.

06.15 New Document Number. New documents use X's for the numbers digits until the document is ready to be sent to the printer. Then the Manual Coordinator assigns a number.

06.16 Technical Editing. All new or substantially revised manual documents must be reviewed by an Agency technical editor. Completion of the editing is to be indicated on the document issuing form (Exhibit 1).

0040-07 COMMENTS ON MANUAL DOCUMENTS

Drafts of new or substantially revised inspection program documents must be sent for review and comment to NRR organizations and to NRC regional and program offices that will be affected by the changes. The originating organization prepares memoranda requesting comments for signature by the Chief, IIPB. The memoranda request that comments be sent directly to the originating organization with a copy to the Chief, IIPB/DIPM/NRR. (See Exhibit 10 for an example of a request for regional comments.)

Non-substantive revisions or updates need not be broadly distributed for comment. Submit minor revisions and updates to the IIPB Manual Coordinator for issuance in the next change notice.

07.01 Regional Comments. Comments from the regions are important because the regions implement the inspection programs, but requests for their comments must be controlled so as not to become burdensome on their workload. Minor, non-substantive changes need not be sent to the regions for comment. Anyone who is considering whether to send an inspection program document to the regions for comments should ask:

a. Will the proposed document affect regional resources?

b. Will the document significantly affect regional programs?

c. Is a regional perspective really needed?

d. Are the regions interested in the subject?

e. Does the document represent a major policy change?

If the answer to any of the questions is "yes," then a draft of the document should be sent to all four regions for comments.

07.02 Requests for Regional Comment. The rules for sending draft documents to the regions for comments are:

a. Don't send rough first drafts.

b. Identify a person the regions can contact to discuss the document.

c. Prepare the request far enough in advance of the document's deadline to allow a reasonable comment period, generally not less than 20 days for mailed correspondence. If a deadline requires a shorter comment period, send the request and the draft document to the regions electronically or by express mail.

d. Send the document to the Deputy Regional Administrator. For reactor inspection program documents, send simultaneous notification to the Directors, Divisions of Reactor Projects and Reactor Safety. For nonreactor inspection program documents, send simultaneous notification to the Director, Division of Nuclear Materials Safety.

e. For requests for regional comments on new or revised manual chapters that involve major policy changes, send a copy to the Chief, Regional Operations Staff; the Office of the Deputy Executive Director for Regulatory Programs; and the Office of the Inspector General.

0040-08 PREPARING DOCUMENTS FOR ISSUANCE

After incorporating comments, the originating organization will review the document again and indicates its approval by signing the document issuing form. The document package is then submitted to the Manual Coordinator, IIPB/DIPM/NRR. (See Exhibit 1, Step 10.) Change packages for nonreactor inspection programs are sent to the Manual Coordinator through the Chief, IIPB.

08.01 Comment Resolution. The originating office will include in the document package a copy of all written comments received, with their disposition briefly noted. The Manual Coordinator will send the disposition of comments to the regions for their information. The comment resolution is also placed in the IIPB program file for the manual document as background information.

08.02 Document Issuing Package. The package submitted to IIPB/NRR includes the final document (with the Issue Date footer filled in by X's (02/02/04) and a document issuing form (Exhibit 1). This exhibit provides the guidelines for concurrence and review. A complete package consists of the following:

a. An electronic or paper copy of the document issuing form (Exhibit 1).

b. An electronic or paper copy of the comments and their resolution.

c. An electronic (WordPerfect) and paper copy of the document being created or revised (including any graphics or exhibits.

d. For major changes to the baseline inspection program, an electronic or paper copy of a reviewed and approved risk-informed baseline inspection program change form (Exhibit 2)

08.03 Manual Coordinator's Review. The IIPB/NRR Manual Coordinator reviews the document for publication. The coordinator's comments, if any, are attached, and the package is forwarded to DIPM/NRR management for approval.

08.04 Final Approval. For documents under NRR's purview, final approval for inclusion in the manual is given by the Director, DIPM/NRR. For other documents, final approval of the document for inclusion in the manual is given by the responsible NMSS manager.

08.05 Standard Distribution of Manual Documents. Standard distribution of new or revised documents is done by a change notice when the new or revised documents are issued.

A complete manual is maintained on the NRC Headquarters Internet Web page at the following URL address: http://www.nrc.gov/NRC/IM/index.html.

END

Appendix A, Process for Evaluating Major Changes to the Risk-Informed Baseline Inspection Program

Exhibits:
1. Document Issuing Form
2. Risk-Informed Baseline Inspection Program Change Form
3. Preparation of a Manual Chapter
4. Preparation of an Inspection Procedure
5. Preparation of a Temporary Instruction
6. Preparation of 10 CFR Guidance for Part 9900
7. Preparation of Technical Guidance for Part 9900
8. Preparation of a Change Notice
9. Preparation of an Appendix
10. Example of Request for Regional Comments

APPENDIX A

PROCESS FOR EVALUATING MAJOR CHANGES TO THE RISK-INFORMED BASELINE INSPECTION PROGRAM

I. PURPOSE

To establish the process for evaluating changes to requirements of the risk-informed baseline inspection program (IMC 2515, Appendix A) to ensure that changes made are consistent with the framework, policies, and underlying principles of the reactor oversight process (Management Directive 8.13).

II. SCOPE

This process is applicable to changes to the operating reactor oversight process and reactor inspection program that:

A. Add a new inspectable area to the baseline inspection program.
B. Remove an existing inspectable area from the baseline inspection program.
C. Change the scope of an existing inspectable area.
D. Add a new performance indicator to the reactor oversight process or significantly revise an existing performance indicator.

The requirements and guidance in this appendix augment the general requirements of IMC 0040.

III. RESPONSIBILITIES

A. Originator. The person or organization that proposes a change to the baseline inspection program is responsible for justifying the change within the framework and principles of the reactor oversight process and reactor inspection program.

B. IIPB. The Inspection Program Branch of NRR is responsible for reviewing all proposed changes to the baseline inspection program and for assuring that the changes are justified.

C. Chief, IIPB. Ensures that this process is followed for major changes to the baseline inspection program and approves all changes to the baseline inspection program.

IV. NECESSARY INFORMATION

The following information is necessary to evaluate proposed changes to the baseline inspection program. The information should be recorded on the baseline inspection program change form (Exhibit 2).

A. Adding Requirements. Adding new inspectable areas or broadening the scope of existing inspectable areas is permissible only if the new requirements are necessary to assess licensee performance in one of the cornerstones of safety and are related to risk, or are necessary for the NRC to meet its regulatory obligations. Therefore, justifications for new requirements need to include the following information.

1. Relationship to cornerstone objectives. The new requirements must obtain information the NRC needs to determine if licensees are meeting the objectives of one of the cornerstones, and cannot be obtained by means other than inspection. The change request must discuss how the information relates to the objectives of the associated cornerstone.

2. Relationship to key attributes. The framework for the reactor oversight process comprises key attributes that must be measured to assure the objectives of each cornerstone are being met. The request for adding new requirements must identify which key attributes the new requirements will measure and why the new requirements are necessary to supplement existing measures of the attributes (performance indicators (PI's), other inspections).

3. Relationship to risk. Although not based on risk, the baseline inspection program is risk informed by virtue of the cornerstone framework and the importance of the inspectable areas in determining that cornerstone objectives are being met. If the proposed requirements have a more direct connection to risk, the connection should be described. The relative importance of the new requirements to existing requirements should also be discussed.

4. Relationship to existing performance indicators. All of the cornerstones have performance indicators that provide information on some key attributes of the cornerstone with which the indicator is associated. The justification for new requirements must discuss whether they measure attributes already indicated by a PI, and, if they do, how the new information measures aspects of performance that can not be indicated by the PI.

5. Proper level of effort. The level of effort in each inspectable area is generally based on the risk importance of the area and its relative importance to the other inspectable areas. In general proposed requirements should not increase the total level of effort in a cornerstone. If the new requirements are more important than existing requirements, than the request needs to identify those requirements that can be removed from the program or reduced to accommodate the newly added requirements.

B. Changing Requirements for New or Revised Performance Indicators. Performance indicators provide information about aspects of performance that relate to meeting the objectives of the cornerstones of safety. The remaining aspects of performance are verified by the baseline inspection program. Any necessary changes to the baseline inspection program are identified when new PI's are developed or existing PI's significantly changed. See IMC 0608, "Performance Indicator Program," for the process to follow in changing a PI or implementing a new PI. In general, the there are two major steps in determining the effects on the baseline inspection program from a new or changed PI: (1) determine the aspects of performance on which the PI provides information, and (2) determine if those aspects are covered by the baseline inspection program.

1. Relationship to cornerstone. The new PI must provide information that the NRC needs to determine if a licensee is meeting the objectives of the associated cornerstone. The discussion should describe which key attributes the PI will indicate and how the PI measures those attributes.

2. Relationship to inspectable areas. The proposed change must identify those inspectable areas that are applicable to the key attributes associated with the PI. The discussion should focus on those aspects of the inspectable areas that measure the same attributes as the new PI and should state whether the entire inspectable areas are affected or only parts of the areas. For example, a PI may indicate performance during routine operations but not during a plant shutdown or during nonroutine operations.

If only parts of an inspectable area are affected, the change proposal must describe how the areas should be restructured to accommodate the new or changed PI.

3. Reduction in Effort. The change proposal must estimate how much reduction in effort is appropriate to accommodate the new or changed PI. The estimate should reflect whether the entire inspectable area would be eliminated or only parts of it. For example, if an inspectable area measures a key attribute that is common to more than one cornerstone (e.g., human performance in initiating events and mitigating systems) and the new or changed PI applies to only one of the cornerstones, the scope and level of effort for the inspectable area should be reduced by eliminating the inspection in that cornerstone.

C. Other Reasons for Changes. There may be compelling reasons other than risk to change or add new baseline inspection requirements. Among those reasons, the requirements must help determine if a licensee is meeting the objectives of the cornerstones of safety or must be necessary for the NRC to fulfill its regulatory obligations. Examples of such requirements currently in the baseline inspection program are as-low-as-reasonably-achieved (ALARA) and operator requalification.

D. Reducing Requirements. Removing an inspectable area from the baseline inspection program, or significantly reducing the scope of an inspectable, must be justified in terms of the significance of the area to plant risk and in relation to the other inspectable areas. Reducing requirements because of a change in PI's is described in section IV.B.

E. Sources of Information. The following documents contain information on the reactor oversight process and its development.

1. SECY- 99-007 and SECY-99-007A. These Commission papers record the basis for the structure of the various elements that comprise the reactor oversight process. They also describe the relationship between the elements, including how the original PIs relate to inspection.

2. IMC 2515 and Appendix A. These documents describe the overall operating reactor inspection program and the baseline inspection program.

3. IMC 0608. This manual chapter describes the performance indicator portion of the Reactor Oversight Process and describes the process for changing existing PI's and creating new PI's.

4. MD 8.13. This management directive describes the overall structure, policies, and implementation of the reactor oversight process. The management directive, along with the basis document (see below), replace the Commission papers as the source documents that describe the basis for the reactor oversight process.

5. ROP Basis Document. This document describes the reasons for specific elements of the reactor oversight process (such as each PI and inspectable area), their relationship to risk, and their interrelationships. It explains the basis for limiting the scope of inspections due to the risk-informed nature of the inspectable area or an existing performance indicator. Additionally, it outlines the history of the process and the reasons for significant changes to the ROP.

V. REVIEW PROCESS

A. Baseline Inspection Program Change Form. Exhibit 2 of IMC 0040 must be used to describe major changes being proposed for the baseline inspection program. The originating organization completes the form (entering the information requested on the form and in Section IV, above). The originating office sends the form to the Chief, Inspection Program Branch, NRR, for further processing.

IIPB may act as the originating office for changes to the baseline inspection program that originate from feedback forms sent to the branch by inspectors or other regional staff.

The originating office gets approval for changes to the baseline inspection program before making changes to baseline inspection program procedures, thus avoiding work on changes that ultimately are not approved.

B. Approving the Proposed Change. The Chief, IIPB, reviews the proposed change and the panel's recommendation and decides whether to incorporate the change. If the Chief, IIPB, does not follow the panel's recommendation, the reasons are recorded; likewise if the change is rejected. The package is returned to the originating office.

C. Approved Changes. Approved changes to the baseline inspection program are incorporated into the associated program documents by the originating office. The originating office then follows the guidance and requirements of IMC 0040 for submitting the revised inspection procedures or manual documents. The originating office also includes with the revised program documents any necessary changes to the (future) reactor oversight process bases document.

IIPB has responsibility for all baseline inspection program procedures but may use other NRR organizations for their technical expertise. If an organization other than IIPB submitted the proposed change, that organization coordinates the incorporation of the change into the documents with IIPB.

D. Regional Participation. The regions participate in changing the baseline inspection program by providing feedback on implementing the program and suggesting changes to it. They provide representatives for the review panel as needed and as regional workloads permit. The regions also review and comment on proposed revisions to baseline inspection program documents that are sent to them for comment in accordance with IMC 0040 guidance.

END

EXHIBIT 1

INSPECTION MANUAL DOCUMENT ISSUING FORM

To: Chief, IIPB/NRR From:_____
(Originating Director)

1. Number and Title of Document:

Number: _____

Title: _____

_____

2. Change Notice Information

Briefly explain why the inspection manual document in 1 above is being issued, revised, or deleted. This explanation will be inserted in the Remarks section of the change notice and will become part of the historical record for the document.

_____

_____

_____

_____

3. Type of Document

☐ Inspection Manual Chapter (IMC)	☐ Inspection Procedure (IP)
☐ Appendix	☐ Temporary Instruction (TI)
☐ Technical Guidance	☐ 10 CFR Guidance

4. Type of Action

☐ New document ☐ Revision ☐ Deletion

5. ROP Basis

All program documents must conform with Inspection Manual Chapter 0308, "Reactor Oversight Process Basis Document." If changes or revisions alter the scope or basis, appropriate updates to the ROP Basis Document are required to be submitted for approval with this document.

Does the Program Document require a change to the ROP Basis Document? ☐ YES ☐ NO

If Yes, then proposed changes to the ROP Basis Document must be submitted by the program document lead for approval with the program document.

6. Baseline Inspection Procedures

6a. If a new IP is being prepared for the baseline inspection program, give the cornerstone to which it applies, the estimated direct inspection effort (DIE) needed to perform the procedure (with any variations for number of reactor units), and the inspection frequency.

Baseline Program: ☐ Yes ☐ No Cornerstone: _____

Frequency of Inspection: _____ (Quarterly, annually, biennially, etc.)

Annual average DIE: _____ 1-unit _____ 2-unit _____ 3-unit sites

6b. For all new or substantially revised baseline inspection procedures, fill out the baseline inspection program change form (IMC 0040, Exhibit 2).

7. New TIs

If a TI is being issued, state the applicability of the TI (i.e., number of plants, types of plants, or specific plants)

_____

_____

_____

_____

8. Training

Identify any new or revised training requirements if needed as the result of the new IP, revised IP, or TI. The group responsible for establishing and presenting the training should also be identified.

	Yes	No
Is training required?	☐	☐

Type of training required (e.g. TTC course, presentation at counterpart meetings, read/sign, detailed change notice,...) _____

Lead branch for establishing training: _____

Training to be given by: _____

Briefly describe proposed training:

_____

_____

9. Give the IIPB Manual Coordinator this form, a paper copy of the document, and an electronic copy (e-mail, ADAMS, or on disk) of the document file (including exhibits such as drawings, reductions, or block diagrams) in the current version of WordPerfect.

		Yes	No	N/A
9a.	Has document been reviewed by the technical editor?			

9b. If not, why: _____

		Yes	No	N/A
10.	Comments received on the document should be resolved. State comments, their sources, and if not adopted, why. Is summary of comments and their resolution attached?			

11. Approval Signatures

a.		d.	
Originator	Date	IIPB Manual Coordinator	Date
b.		e.	
Originator's Section/Branch Chief	Date	IIPB Branch Chief (NRR programs only)	Date
c.		f.	
NMSS Responsible Manager (NMSS programs only)	Date	Director, DIPM/NRR (NRR programs only)	Date

12. Date received by IIPB Manual Coordinator: _____

13. Change notice number and issue date: _____

END

GUIDELINES FOR THE USE OF EXHIBIT 1*

Responsible Party	Action
ORIGINATOR	Completes the document issuing form. Forwards it with final document and summary of comment resolution to originator's section chief or branch chief.
ORIGINATOR'S SECTION OR BRANCH CHIEF	Reviews for approval, signs form, and forwards to next level of review or to the IIPB Manual Coordinator.
NMSS RESPONSIBLE MANAGER	Approves for issue documents associated with programs under their cognizance.
IIPB/NRR MANUAL COORDINATOR	Reviews document for agreement with IMC 0040 requirements, administrative requirements, and technical content. Resolves problems with the originator or originator's supervisor and if necessary, returns document for further processing. Prepares change notice and assigns numbers to new documents (manual chapters, inspection procedures, temporary instructions).
IIPB/NRR BRANCH CHIEF	Approves package for forwarding through management to DIPM/NRR Director for final approval (NRR programs only).
DIPM/NRR DIRECTOR	Approves all documents before they are issued (NRR programs only).

*Note: A document issuing form is required for every document issued. Document issuing forms are available from the IIPB Manual Coordinator.

EXHIBIT 1 (Continued)
Sample of Comment Resolution Summary

RESOLUTION OF COMMENTS FOR
IMC XXXX (Date)

Source	Comment	Added	Remarks
R-I	The first comment is stated or paraphrased.	Yes	No remarks necessary if comment incorporated in full.
R-I	Second comment is stated or paraphrased.	No	Explain why comment not incorporated into program document.
R-II	No comments		
R-III	Xxxx xxxxx xxxx xxx xx.	Yes	Explain why if comment only partially incorporated.
R-IV	Xxx xxxxx xxx xxxx.	Yes	
NMSS	Xxxx xxxx xxxxx xx.	Yes	

EXHIBIT 2

RISK-INFORMED BASELINE INSPECTION PROGRAM
CHANGE FORM

1. Describe the new or revised requirement to be added to the baseline inspection program:

2. Check associated cornerstones of safety

Initiating Events	Mitigating Systems	Barrier Integrity	Emergency Preparedness	Public Radiation Safety	Occupational Radiation Safety	Physical Protection

3. How does the new or revised requirement help the NRC determine a licensee's ability to meet the cornerstone objective? (Refer to IMC 0040, Appendix A, Sections IV.A.1, and IV.B.1; and SECY 99-007 for descriptions of the cornerstone objectives.)

4. What key attributes will be measured by the new or revised inspection requirement? (Refer to IMC 0040 Appendix A, Sections IV.A.2 and IV.B.1; IMC 2515, Appendix A, Attachment 2; SECY 99-007.)

5. Are there other compelling reasons to add or change this requirement? (Refer to IMC 0040, Appendix A, Section IV.C.)

6. If a performance indicator is associated with the key attributes, how does the new or revised requirement relate to it? (Refer to IMC 0040, Appendix A, Sections IV.A.4 and IV.B.2.)

7. How does the new or revised requirement relate to plant risk? (Refer to IMC 0040, Appendix A, Section IV.A.3.)

8. How does the new or revised requirement relate to the other inspection requirements in this area? (Discuss in terms of risk, importance to safety, and the cornerstone objectives. Refer to IMC 0040, Appendix A, Sections IV.A.5 and IV.B.3.)

9. What is the estimated direct inspection effort for this new or revised requirement? (Refer to IMC 0040, Appendix A, Section IV.A.5.)

10. What existing less important requirements should be reduced or eliminated if this requirement is added to the baseline inspection program? (Refer to IMC 0040, Appendix A, Sections IV.A.5 and IV.B.3.)

11. Originating Office:

a.

Originator	Date	Originating Organization (Branch, Division)

b.

Originator's Branch Chief	Date

c.

IIPB Manual Coordinator	Date

12. Reviews and Approvals

Date Submitted to Review Panel:

Panel Recommendation: Approve ☐ Disapprove ☐

Panel Comments:

Chief, IIPB: Approve ☐ Disapprove ☐

Comments:

Signature: _____ Date: _____

12. Date Returned to Originating Office:

END

EXHIBIT 3

PREPARATION OF AN INSPECTION MANUAL CHAPTER

NRC INSPECTION MANUAL ABCD

MANUAL CHAPTER XXXX

TITLE

XXXX-01 PURPOSE

This is a broad statement of the function or subject matter covered by the manual chapter. It may also be used to state aspects of the function not covered in the subject matter.

XXXX-02 OBJECTIVE(S) (OR POLICY)

This section is used to state the aim(s) of the program or functions covered by the chapter. The objective(s) may be implicit in the statement of purpose (01, above). In that case this section may not be necessary. If a statement of policy is more appropriate, "policy" may be substituted for "objective(s)." The section may be subdivided and paragraphed as follows (do not use 02.01 unless there is an 02.02):

02.01 X xx x xxxxxx xxxx xxxxxx xxxxxx x x xxxxxxxx xxxxxx xxxx xxxxxxxx xxxxxxx x x xx xxxxxx xxxx xxxxxxxxx x xxxxxxx xxxxx xxxx.

Xxxx xx xxx xxxxxxx xxxx x x xxxxxxxxxxx x x xxxxxxxx xxxxxxxx x xx xxxxxx xxxxxx x xxxxxx x.

02.02 Xxxxxxxxxxxxxxxxx. Xxx xxxx x xxxxxxx xxxxx xxxxxxxx xxxxxxxxx x xxxx xxxxxx xx xxxx.

XXXX-03 DEFINITIONS

Definitions are given only if terms are used in a special sense or if their meaning may not be clear to the user. If many terms must be defined, a glossary of terms may be included as an appendix to the chapter. The section is subdivided and paragraphed as follows:

03.01 The term that is first (either in importance or alphabetically). This term and the others that follow are defined according to their context in the chapter.

03.02 The term that is second. Xxx xxx xxxx xxxxxxxx xxxxxx xxxxx x xxxxxxxxx x xxxxx xx xx xxxxxx xxxxx xx xxx xxxxxxx xxxx.

XXXX-04 RESPONSIBILITIES AND AUTHORITIES

Sections (04.01, 04.02, etc.) are arranged in descending order of authority.

04.01 Director, [Program Office]

a. The authorities, if any, reserved by the Director of [Program Office].

b. Xxxxxxxxxxxxxxxxxxxxxx.

04.02 Manager of Organization

a. The responsibilities and authorities of the managers who have primary responsibility for the program.

b. Xxxxxxxxxxxxxxxxxxxxxx.

04.03 Other Responsibilities. If necessary, a separate section may be used to define responsibilities and authorities common to all the managers of the organizational units involved.

XXXX-05 BASIC REQUIREMENTS

Subsequent sections (05.01, 05.02, etc.) are used to define and explain the requirements of the function or program.

05.01 Sections.* Sections are numbered consecutively (05.01, 05.02, etc.) and titles are underlined. Further subdivisions formatted as shown below. The IMC format WordPerfect template includes the correct paragraph formatting. Therefore, automatic paragraph numbering may be used. The template can be obtained from the IIPB Manual Coordinator.

a. Xxxxxxxx xxxxxx xxxx xxxxxxxxxx x xxxxxxx xxxxxxx xxxx xxxxx xxxxxx xxxx x xxxxxxx x xxx xxx.

1. Xxxxxxxxx x xxx x xxxxx xxxxxxxxxx xxxx xxxxxxxxxx xxxxxxxxx x xxxxxxx xxxxx xxxx xxxx.

(a) Xxx xxxxxx xxxx xxxxxxxxx xxxxx xxxxx xxxxxxxx xxxxxxxx xxxxx xxxxxxx xxxx xxxxxx xxx.

(1) Xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx. Avoid this level of subordination if possible.

XXXX-06 OTHER REQUIREMENTS (OR GUIDANCE)

END

Appendices (if applicable)
A. Xxxxxxxxx

B. Xxxxxxxxx

* The subdivisions that follow merely illustrate the hierarchy. An 05.01 is not needed unless there is an 05.02; an a is not needed unless there is a b; a 1 is not needed unless there is a 2.

EXHIBIT 4

PREPARATION OF AN INSPECTION PROCEDURE

NRC INSPECTION MANUAL ABCD

INSPECTION PROCEDURE XXXXX

TITLE

PROGRAM APPLICABILITY: XXWW, WWYY, XXZZ

XXXXX-01 INSPECTION OBJECTIVE(S)

This section is used to briefly state the objective(s) of the inspection procedure. If necessary, the section may be subdivided as follows:

01.01 Statement of Objective. Subdivisions of inspection objectives often contain statements without separate underlined heads.

Xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx.

01.02 XXXXXXXXX. Other statements follow, until all objectives have been stated.

XXXXX-02 INSPECTION REQUIREMENTS

This section defines inspection requirements necessary to meet the objectives stated in Section 01 of the procedure. Requirements stated here are to be met by the inspector in carrying out the inspection. They are not requirements for licensees, although they may reference regulatory requirements, regulatory guides, and industry codes and standards.

The inspection requirements may be written in various ways, but must focus on achieving the inspection objectives. The usual approach is to specify systems, components, facility areas, and records to be examined by the inspector; licensee operations and activities to be observed and evaluated; and measurements or other actions to be taken.

The inspection requirements should not involve excessive document review. Some auditing of documents may be necessary, but the emphasis should be on inspecting equipment and observing licensee activities.

Terminology must be consistent. Do not use two or more words for the same idea, concept, or activity. Except for abbreviations in common use, show the complete word, title, or phrase the first time it is used with the abbreviation in parenthesis immediately after, for example, service water system operational performance inspection (SWSOPI).

The originator must make clear what is mandatory on inspectors and what is discretionary, for example, by using auxiliary verbs “must,” “shall,” and “will” to indicate mandatory requirements and “can,” “may,” “might,” and “should” to convey discretion.

Inspection requirements may also be stated in terms of the standards against which the inspector evaluates the licensee's controls and programs. Standards include regulatory requirements, industry codes and standards, and accepted safety practices for the activity or subject area covered by the inspection procedure.

As appropriate, the requirements specify the sample size for the inspection activity, such as the number of a given type of record to be examined, and the method of inspection, such as observation, record review, and discussions with plant personnel.

The section may be subdivided into two or more subdivisions:

02.01 A Requirement. This section begins with an underlined heading that defines the subject of the requirements. Succeeding sections are numbered sequentially 02.02, 02.03, etc. The IMC format WordPerfect template includes the correct paragraph formatting. Therefore, automatic paragraph numbering may be used. The template can be obtained from the IIPB Manual Coordinator.

a. Further Subdivisions.* The next subdivisions are lettered sequentially and any headings are underlined.

    1. The next level is numbered 1, 2, 3, etc.

        (a) Avoid further levels if possible.

            (1) This is the lowest level.

02.02 Numbering. Each inspection requirement has a specific number or letter (unless there is only one inspection requirement). This is indispensable for identification purposes in Section 03, "Inspection Guidance."

02.03 Baseline Inspection Program Procedures. Inspection requirements for cornerstone procedures of the risk-informed baseline inspection program are attached to the procedures. The Inspection Requirements section of a baseline cornerstone procedure lists the attachments. It also contains any inspection requirements that apply to all of the attachments to the procedure.

XXXXX-03 INSPECTION GUIDANCE

This section provides information to assist the inspector in meeting the inspection requirements. The guidance reflects experience gained in past inspections. It may reference regulatory requirements and guides, industry codes and standards, 10 CFR discussions, and technical guidance. The guidance may include short quotations from referenced material, but then it must be revised by the originating organization whenever the material quoted is changed.

For baseline inspection program cornerstone procedures, this section contains guidance that applies to all of the attachments to the procedure. It should also discuss any performance indicators associated with the cornerstone.

---

*The subdivisions that follow merely illustrate the breakdown. An “02.01" is not needed unless there is an “02.02;” an "a" is not needed unless there is a "b"; a "1" is not needed unless there is a "2," etc.

General Guidance

If generic guidance is necessary for the procedure, it shall be unnumbered and entitled "General Guidance." Paragraphs under General Guidance are not numbered.

Specific Guidance

Specific guidance begins with Section 03.01. This section is subdivided like Section 02 and further subdivisions are numbered and lettered in the same manner. These sections and subdivisions provide guidance for the correspondingly numbered sections and subdivisions of Section 02. For example, paragraph 03.01 a.2 contains guidance for the inspection requirement in 02.01 a.2. The sections and subdivisions in 03 need not be titled, but if they are, the titles should be identical to the corresponding sections and subdivision titles in Section 02. When no specific guidance is given for an inspection requirement, the phrase "No inspection guidance" is used.

XXXXX-04 RESOURCE ESTIMATE

In this section the originating organization estimates the average number of onsite inspection hours needed to complete this inspection. Separate estimates should be made for two- and three-unit sites if inspections there require larger sample sizes. The estimates are for broad resource planning and are not intended as measures for judging the inspector's or region's performance. Actual inspections may require substantially more or less time, depending on the circumstances.

XXXXX-05 REFERENCES

Some inspection procedures append a list of the documents that apply to the procedure. The list usually includes citations from the Code of Federal Regulations, industry codes and standards, regulatory guides, etc. No subordination is needed. If documents have been fully referenced in the text, this section may be omitted. References should apply directly to the performance of the IP. They should not include general background information. The list of references should be limited to no more than 12 at the most.

10 CFR Part 50, Appendix B, Criterion IX.

ASME Boiler and Pressure Vessel Code, Sections III and V.

Society for Nondestructive Testing, Recommended Practice No. SNT-TC-1A and Supplements.

Regulatory Guide 1.58, "Qualification of NDE and QC Personnel," September 1980.

ANSI N45.2.6, "Qualification of Inspection, Examination and Testing Personnel."

END

Appendices (if applicable)
A. Xxxxxxxxx

B. Xxxxxxxxx

ATTACHMENT XXXXX.YY

INSPECTABLE AREA: Adverse Weather Protection

CORNERSTONES: Initiating Events (20 percent)
Mitigating Systems (80 percent)

This section identifies the cornerstone or cornerstones of safety to which the inspection applies. If more than one cornerstone within the reactor safety strategic area applies, then the relative importance of the cornerstones in the inspection is given as a percentage.

INSPECTION BASES: This format only applies to reactor inspection baseline inspection program procedures. This section briefly discusses the scope of the inspection area and why it needs to be inspected.

LEVEL OF EFFORT: Level of effort combines the frequency, the sample size, and the duration of the inspection. This section should tell the inspector of when to conduct this inspection how important this area is compared to the other inspectable areas in the baseline inspection program.

XXXXX.YY-01 INSPECTION OBJECTIVE

Follow the guidance for the inspection objectives in Exhibit 3 of this manual chapter.

XXXXX.YY-02 INSPECTION REQUIREMENTS

Follow the guidance for inspection requirements in Exhibit 3 of this manual chapter.

The baseline inspection program includes five procedures that cover the seven cornerstones of safety in the reactor oversight process (one reactor safety procedure covers three cornerstones). The inspection requirements of the baseline cornerstone procedures are in separate attachments. The attachments correspond to inspectable areas that have been risk informed and work with performance indicators to provide a minimum level of oversight to maintain power plant safety. The attachments are stand-alone procedures and follow the guidance for inspection procedures as amended by this exhibit.

02.01 Numbering. Baseline inspection program procedure attachments are numbered with 2-place decimals following the base procedure number (for example, 71111.05). Because the numbers are used for recording inspection effort and compared over the years, the attachment numbers do not change. Therefore, if an attachment is deleted from a procedure, the succeeding attachments are not renumbered to fill the gap.

02.02 Sample Sizes. Baseline inspection procedures must explicitly define the amount of inspection. If necessary, the sample sizes specified in the attachment are adjusted for the number of reactor units at a site to obtain sufficient performance information for multi-unit sites. The sample sizes allow for some deviation.

02.03 Identification and Resolution of Problems. A part of each cornerstone inspection procedure is devoted to inspecting how licensees find and fix their problems within that cornerstone. These requirements can be stated in the cornerstone procedure itself, in a separate attachment to the cornerstone procedure, or as requirements in attachments for major inspectable areas.

XXXXX.YY-03 INSPECTION GUIDANCE

Follow the guidance for this section in Exhibit 3 and Section 06.03 of this manual chapter.

Baseline inspection program procedure attachments that apply to more than one cornerstone should provide guidance on inspecting each cornerstone. The guidance can be in the form of a table with examples of what to inspect in each cornerstone, generic risk insights on each cornerstone, and the objective for inspecting each cornerstone.

XXXXX.YY-04 RESOURCE ESTIMATE

Use the guidance for this section in Exhibit 3 of this manual chapter.

XXXXX.YY-05 REFERENCES

Use the guidance for this section in Exhibit 3 of this manual chapter.

END

EXHIBIT 5

PREPARATION OF A TEMPORARY INSTRUCTION

NRC INSPECTION MANUAL ABCD

TEMPORARY INSTRUCTION XXXX/XXX, REVISION _

TITLE

CORNERSTONE: State which reactor oversight process cornerstone of safety applies to the temporary instruction (TI). This entry on the TI is required only for IMC 2515 programs.

APPLICABILITY: This section describes which types of operating nuclear power plants or which specific nuclear facilities are inspected using this TI.

XXXX/XXX-01 OBJECTIVE

This section is used to briefly state the aim of the program or function covered by this temporary instruction (e.g., "to verify the installation and operability of a recirculation pump trip on either low water level or high reactor vessel pressure for BWR plants").

01.01 Subdivisions have this format:

a. Xxxxxxxxxxxxxxxxxxxxxx.

b. Xxxxxxxxxxxxxxxxxxxxxx.

1. If further subdivisions are needed, 1, 2, 3, etc., follow.

2. Xxxxxxxxxxxxxxxxx.

(a) This level is rarely needed.

(b) Xxxxxxxxxxxxx.

01.02 Xxxxxxxxxxxxxxxxxxxxxx.

XXXX/XXX-02 BACKGROUND

This section is used to explain the reason for issuing the temporary instruction.

XXXX/XXX-03 INSPECTION REQUIREMENTS

Succeeding subdivisions (04.01, 04.02, etc.) are used to define and explain the requirements of the function or program. Numbering and paragraphing are the same as for a manual chapter. See Exhibit 3, Section 05.

XXXX/XXX-04 GUIDANCE (optional - see Exhibit 4)

XXXX/XXX-05 REPORTING REQUIREMENTS

Normally, inspection findings are documented in a routine inspection report. Other reporting requirements and nonstandard distribution instructions should be given in this section. If the TI includes an inspection requirement to verify licensee completion of an action (develop procedures, conduct tests, etc.) that was neither imposed on the licensee as a requirement nor committed to by the licensee, the originator must direct the inspector to disregard the inspection requirement for that licensee, document in the inspection report that the licensee is not subject to the requirement, and refer the matter to the program office. When a TI inspection addresses a generic issue, and especially when it closes the issue, the inspection report should so state and give the multi-plant action (MPA) number.

XXXX/XXX-06 COMPLETION SCHEDULE

This section gives the expected date of completion of the inspection. This date should be reasonable and precede the expiration date.

XXXX/XXX-07 EXPIRATION

This section states how long this temporary instruction remains in effect. The period is usually 12 months and never longer than 24 months.

XXXX/XXX-08 CONTACT

This section gives the names and complete phone numbers, including area code or FTS number, of the technical contact and lead project manger, if there is one, for the TI's subject.

XXXX/XXX-09 STATISTICAL DATA REPORTING

This section identifies the inspection procedure element (IPE) code to which inspection time should be charged. For RITS reporting, time is charged to the TI number. The procedure number and code for charging follow-up inspection after the TI is closed is also identified here.

XXXX/XXX-10 ORIGINATING ORGANIZATION INFORMATION

10.01 Organizational Responsibility. For example: The Mechanical Engineering Branch (EMEB/NRR) initiated this TI.

10.02 Resource Estimate. The estimated onsite inspection hours necessary to complete the TI. This section is for broad resource planning and is not intended as a measure for judging the inspector's or region's performance. Actual inspections may require substantially more or less time, depending on the circumstances.

10.03 Other. Other required inspection procedures or specific inspection requirements satisfied by the TI are listed here.

10.04 Training. This section describes the originating organization's arrangements for inspectors to get any specialized training needed to perform inspection requirements in the TI beyond basic training for inspectors (specified in IMC 1245, "Inspector Qualifications"). The originating organization coordinates specialized training with the Technical Training Division. Specialized training requirements are stated here.

END

Appendices (if applicable)
A. Xxxxxxxxx

B. Xxxxxxxxx

EXHIBIT 6

PREPARATION OF 10 CFR GUIDANCE FOR PART 9900

NRC INSPECTION MANUAL ABCD

PART 9900: 10 CFR GUIDANCE

10 CFR PART 20.201 RADIATION DOSE STANDARDS FOR INDIVIDUALS IN RESTRICTED AREAS

A. PURPOSE

This section briefly explains why this regulation (10 CFR section 20.201, in this example) is discussed in the manual.

B. BACKGROUND

This section provides background information necessary to understand the guidance and its context.

C. DISCUSSION

This section discusses or explains the CFR part or section. If the information is published in a guide or standard, extract the pertinent information and include it in this section with references, or put the information in an appendix and reference the appendix in this section. Subdivide as follows:

1. Subdivisions. Subdivisions are numbered consecutively, 1, 2, 3,. etc. Headings, if necessary, are underlined.

    a. Further Subdivisions. The next subdivisions are lettered, a, b, c, etc.; headings, if necessary, are underlined.

        (1). Further breakdowns of the subject matter are numbered (1), (2), (3), etc.

            (a) Further subordinations are lettered (a), (b), (c). Avoid excessive subordination.

END

EXHIBIT 7

PREPARATION OF TECHNICAL GUIDANCE FOR PART 9900

NRC INSPECTION MANUAL ABCD

PART 9900: TECHNICAL GUIDANCE

STANDARD TECHNICAL SPECIFICATIONS
SECTION 3/4.8.1
TDI DIESEL GENERATOR AIR ROLL TESTS

A. PURPOSE

This section briefly explains why this guidance is included in the manual.

B. BACKGROUND

This section provides background information necessary to understand the guidance and its context.

C. DISCUSSION

This section discusses or explains the standard, requirement, or technical issue. If the information is published in a guide or standard, extract the information and include it in this section with references, or put the information in an appendix and reference the appendix in this section. Subdivide as follows:

1. Subdivisions. Subdivisions are numbered consecutively, 1, 2, 3, etc. Headings, if necessary, are underlined.

    a. Further Subdivisions. The next subdivisions are lettered, a, b, c, etc.; headings, if necessary, are underlined.

        (1). Further breakdowns of the subject matter are numbered (1), (2), (3), etc.

            (a) Further subordinations are lettered (a), (b), (c). Avoid excessive subordination.

END

EXHIBIT 8

PREPARATION OF A CHANGE NOTICE

NRC INSPECTION MANUAL ABCD

Change Notice 01-XXX

	DELETED:		TRANSMITTED:	
	Number	Date	Number	Date
1.	IMC 0010	01/01/81	IMC 0010	01/01/95
2.	IP XXXXX	02/02/04	IP XXXXX	01/01/95
3.	TI 2512/09	03/02/81	----	----

TRAINING: Use one of the following statements as appropriate.

The following training is required for documents in this change notice:

No special training is required for any documents issued with this change notice.

REMARKS: This section summarizes the documents being issued and briefly explains why the documents are being issued, revised, or deleted. The originator supplies the Remarks text to the IIPB/NRR Manual Coordinator, who then inserts it in the change notice.

DISTRIBUTION: Standard. If additional distribution is desired, add the additional organizations.

END

EXHIBIT 9

APPENDIX A
Appendixes are designated A, B, etc.

TITLE OF APPENDIX

I. PURPOSE

To provide certain supplementary material.

II. BACKGROUND

A. An appendix often originated elsewhere. State where it originated and, if it is copyrighted material, that reproduction has been authorized.

B. The format and content may have been prescribed by a different organization than the one reproducing the document.

C. The material is appended to the document because it is needed to meet the requirements of the document.

III. BASIC REQUIREMENTS

A. There are few format requirements for an appendix.

1. A table or series of tables may become an appendix.

2. A figure or series of figures may become an appendix.

3. An outline may become an appendix.

4. A report may become an appendix.

5. Any combination of items 1–4, above may become one or more appendixes.

B. Besides 1-inch margins (0.5-inch top and bottom), there are three requirements for an appendix:

1. The issue date is on each page of each document in the form 02/02/04. The actual date will be entered by the Manual Coordinator before the document is sent to the printer. The issue date is placed on the lower left of every odd-numbered page and on the lower right of every even-numbered page (as illustrated in this manual chapter). (See Section 06.13 of this IMC.)

2. Any information appended to a manual document is listed on the last page of the document as shown in Exhibits 3, 4, and 5.

3. Newly created material uses the WordPerfect automatic paragraph numbering scheme of I.A.1.a.(1).(a).

END

EXHIBIT 10

EXAMPLE OF A REQUEST FOR REGIONAL COMMENTS

MEMORANDUM TO: James T. Wiggins, Deputy Regional Administrator, RI
Bruce S. Mallett, Deputy Regional Administrator, RII
James L. Caldwell, Deputy Regional Administrator, RIII
Thomas P. Gwynn, Deputy Regional Administrator, RIV

FROM: Michael R. Johnson, Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: REVISION TO NRC INSPECTION MANUAL CHAPTER 2700, "VENDOR INSPECTION PROGRAM"

Attached is a proposed revision to the NRC's Inspection Manual Chapter 2700, "Vendor Inspection Program." The revision updates the manual chapter to reflect the current activities being performed by the Vendor Inspection Branch.

Please provide your comments to Theodore Quay, Chief, Quality Assurance, Vendor Inspection, Maintenance, and Allegations Branch (Mail Stop O6-F2), with a copy to me, by January 8, 2000. If you have any questions, please contact Ted Quay via e-mail (TRQ) or by calling (301) 415-1017.

Contact: G. Cwalina, IQMB, NRR
(301) 415-2983

Attachment:
As stated

cc w/attachment:
M. Johnson, NRR

For all documents issued for comment include: Appropriate technical branches and NTEU

For manual chapters issued for comment include: EDO

For all TIs issued for comment include: OE

END