

# NRC INSPECTION MANUAL

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## MANUAL CHAPTER 0306

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### INFORMATION TECHNOLOGY SUPPORT FOR THE REACTOR OVERSIGHT PROCESS

#### 0306-01 PURPOSE

01.01 To provide program office policy and guidance for the use of NRC information management systems, such as the Reactor Program System (RPS) and the Reactor Oversight Process (ROP) Web page to support ROP implementation.

This manual chapter discusses the following specific areas:

- a. Inspection Procedure Planning and Frequencies
- b. Inspection Procedure Status and Sample Sizes
- c. Charging Time for ROP Activities
- d. Inspection Report and Item Numbering
- e. Entering Inspection Findings into the Plant Issues Matrix (PIM)
- f. ROP Web Posting Process and Schedule

#### 0306-02 OBJECTIVES

02.01 To establish the policy and processes for entering and maintaining data in RPS and other NRC information systems used to support the ROP.

02.02 To help users of RPS and other NRC information systems, as well as NRC management, in understanding and utilizing ROP-related information provided by these information systems.

02.03 To ensure consistency in the format and content of ROP-related data entered into RPS and other NRC information systems.

02.04 To ensure that the ROP-related data entered into RPS are complete, accurate, and timely for plant assessment and ROP self-assessment.

02.05 To ensure control and access to RPS by program office and regional office users. |

NOTE: ROP-related data from RPS and other NRC information systems are used for several purposes, including (1) producing official agency records; (2) developing the ROP Web Page; (3) providing inputs to NRC management decisions; and (4) answering questions that the NRC receives from Congress, the Commission, State officials, interveners, and other interested parties.

## 0306-03 DEFINITIONS

The terms used in this manual chapter are consistent with the definitions provided in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," and IMC 0612, "Power Reactor Inspection Reports."

03.01 Reactor Program System (RPS). A collection of databases that provides an integrated methodology for planning, scheduling, conducting, reporting, and analyzing most of the reactor inspection functions and activities performed by the NRC regions and headquarters.

03.02 Inspection Planning Cycle (IPC). The 12-month period from January 1 through December 31 of each year during which inspections are planned and plant performance is assessed.

03.03 Plant Issues Matrix (PIM). A consolidated listing of individual plant issues (i.e., inspection findings) related to plant performance.

03.04 Agencywide Documents Access and Management System (ADAMS). The information system that the NRC uses to maintain and disseminate the agency's official records.

03.05 Event date. For integrated inspection reports, this date is the end of the pertinent inspection period in which the item was identified as an apparent violation (AV), finding (FIN), violation (VIO), or non-cited violation (NCV). This may or may not correspond to the final exit meeting date, depending on the type of inspection being conducted. The event date for Licensee Event Reports (LERs) is the actual event date described in the LER and not the LER issue date.

03.06 Direct Inspection Effort. Time spent conducting an inspection procedure which relate to the Inspection Program Elements (i.e., baseline, supplemental, etc.)

03.07 Non-Direct Inspection Effort. Time spent supporting an inspection procedure which relate to any of the activity codes for the ROP (i.e., preparation, documentation, travel, SDP, etc.).

## 0306-04 RESPONSIBILITIES AND AUTHORITIES

### 04.01 Program Offices

- a. Ensure that RPS implementation is consistent with related NRC policies, programs, and guidance, as well as other NRC information systems.
- b. Resolve RPS implementation problems, prioritize system enhancements, and update and issue implementation guidance.
- c. Verify the accuracy and timeliness of the data maintained in RPS and on the ROP Web page.
- d. Control access to RPS by program office users. Staff who no longer need access to RPS modules should be removed. A periodic review of authorized users for each RPS module should be conducted.
- e. Maintain and control the data in the RPS Inspection Procedure Authority System (IPAS) module to ensure accuracy and compliance with the NRC Inspection

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- f. Ensure the timely and accurate recording of time for all program office activities to support the ROP.
- g. Ensure the timely and accurate transfer of inspection reports, assessment letters, and inspection plans from ADAMS to the Web server to support the posting of this information to the ROP Web page.
- h. Ensure the timely and accurate posting of ROP data to the ROP Web page in accordance with established schedules.

#### 04.02 Regional Offices

- a. Ensure the timely and accurate entry of RPS data for all regional activities including, but not limited to, the inspection plan and the PIM.
- b. Ensure effective management of open items tracked in RPS in accordance with regional policies, procedures, and practices.
- c. Ensure complete and accurate entry of enforcement-related open items, including notices of violation, non-cited violations, notices of deviation, and escalated enforcement items.
- d. Control access to RPS by regional office users. Staff who no longer need access to RPS modules should be removed. A periodic review of authorized users for each RPS module should be conducted.
- e. Ensure the timely and accurate recording of time for all regional activities to support the ROP.
- f. Ensure the timely and accurate entry of inspection reports, assessment letters, and inspection plans in ADAMS to support the posting of this information to the ROP Web page.
- g. Verify the accuracy and timeliness of the data maintained in RPS and on the ROP Web page.

#### 04.03 All RPS Users. Ensure that the following security considerations are understood and adhered to:

- a. Access to RPS modules (i.e., IP, IR, etc.) is controlled via the RPS Security Access System (SAM) module to ensure that entry and update capabilities are restricted to authorized personnel only. The SAM module is maintained by designated Office of Nuclear Reactor Regulation (NRR) and regional representatives. These representatives have the capability to allow or restrict access to each RPS module by any individual member of the NRC staff. Staff who no longer need access to RPS modules will be removed and a periodic review of authorized users for each RPS module will be conducted.
- b. RPS may contain pre-decisional information, so system confidentiality is necessary to prevent inappropriate disclosure of this type of information. Provisions for controlling access to information found in the RPS database are specified in the Privacy Act of 1974, 5 USC 552a, and in the NRC's regulations specified in 10 CFR Part 9.

- c. To the extent possible, proprietary data, security information, and other sensitive unclassified information should be excluded from both the RPS database and the ROP Web page. Reference to an allegation or an alleged should always be excluded.

## 0306-05 GENERAL REQUIREMENTS

05.01 Reactor Program System. Additional detailed information on entering and updating RPS data, understanding the computer screen layouts, and creating and printing reports is provided through the RPS Help Services Web page. The RPS Web page can be accessed from the RPS Help menu. From the RPS Web page, users can access the RPS Dynamic Web page and user guides, and can send email messages directly to RPSHELP.

### 05.02 Inspection Procedure Planning and Frequencies

- a. The regions use the RPS Inspection Planning (IP) module to plan and schedule inspections based on an annual inspection planning cycle (IPC). IPCs begin on the first of January and end on December 31<sup>st</sup>; not to exclude semi-annual cycles (1<sup>st</sup> semi-annual January 1 - June 30 and 2<sup>nd</sup> semi-annual July 1 - December 31). Quarters are defined within the IPC as standard calendar quarters (i.e., Q1 is January 1 - March 31, Q2 is April 1 - June 30, Q3 is July 1 - September 30, and Q4 is October 1 - December 31). In accordance with IMC 0305, the start date of an inspection finding for consideration in the assessment program is the end of the pertinent inspection period in which the item was identified as an AV, finding (FIN), violation (VIO), or non-cited violation (NCV). Therefore, if an inspection period ends during the first week of a new quarter then the finding is considered in the ROP Action Matrix starting in the new quarter.

RPS/IP Report 22, "Inspection/Activity Plan," may be used to review the planned inspection activities for any plant, for any given period of time. In accordance with IMC 0305, the inspection plan that is attached to the Annual Assessment Letter and Mid-Cycle Letter is produced by running RPS/IP Report 22 to provide a schedule of NRC inspections at a given site for approximately the next 18 months. These inspection plans are posted on the ROP Web page, along with the assessment letter that accompanied them.

- b. The regions plan inspections by scheduling inspection procedures that are listed in the RPS/Inspection Procedure Authority System (IPAS) module. The NRR Reactor Inspection Branch (IRIB) maintains the inspection manual and procedures in accordance with IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual." IRIB also maintains and controls the data in the RPS/IPAS module to ensure accuracy and compliance with the IMC.

Some baseline inspection procedures are assigned different inspection frequencies and requirements for completion of specific inspection samples; however, the IPAS module can assign only one inspection frequency and sample size per procedure. In order to accommodate the inspection planning process and the IPAS module, a system was developed to create an artificial inspection procedure number for those inspection procedures that are implemented with more than one frequency or have specific sample completion requirements. This numbering scheme exists only in RPS and does not affect the listing, content, or application of an inspection procedure outside of RPS. An up-to-date list of the baseline inspection procedures by inspectable area and how they are listed in the RPS/IPAS module can be found through the RPS "How do I" web page at:

All other inspection procedures not listed within this table are listed in RPS by the actual inspection procedure number.

#### 05.03 Inspection Procedure Status and Sample Sizes

- a. As soon as practical after completion of the inspection, the cognizant branch chief (or designee) must update the completed sample size of each inspection procedure used during the inspection (procedures referenced in the inspection report) in the RPS / Item Reporting (IR) module.
- b. Step-by-step guidance for entering sample sizes is available through the RPS "How do I" web page at:

<http://nrr10.nrc.gov/rps/how-do-i/ir-adding-samples.htm>

- c. The sample size entered is not cumulative and should represent only those samples actually inspected during the current inspection. (RPS will calculate the cumulative total from the sample entries). Sample sizes are limited to whole numbers. Sample sizes are collected and analyzed by site, although the entry fields in RPS request data by unit. Each inspection procedure defines what constitutes a sample and the minimum sample size that constitutes completion of the procedure. (A summary tabulation of minimum required sample sizes and frequency for each baseline inspection procedure is available in RPS, Dynamic Web Site, ROP, Item 6, "List of ROP Procedures"). The completion status of the procedure remains "Incomplete" until the cumulative minimum sample size has been reached in RPS/IR. When the cumulative completed sample size equals or exceeds the minimum required sample size for the procedure, the branch chief (or designee) updates the status of the procedure to "Complete" as follows.
- d. The completion status of the procedure is updated in RPS/Inspection Planning (IP). Step-by-step guidance for entering the completion status is available through the RPS "How do I" web page at:

<http://nrr10.nrc.gov/rps/how-do-i/ip-sample-status.htm>

The completion status for inspection procedures that are implemented at a quarterly, semi-annual, and annual frequency is determined based on the annual requirements for sample size. The completion status for procedures that are implemented at a biennial or triennial frequency is based on the sample size requirements listed in the procedure.

At the beginning of the inspection cycle, all baseline inspection procedures that have an annual completion requirement are assigned a completion status of "Incomplete" and a completed sample size of "0". The procedure status remains as "Incomplete" until the minimum required sample size is inspected. When the minimum sample size has been inspected and reported in RPS/IR as described above, the branch chief (or designee) updates the completion status of the procedure to "Complete."

The status of baseline procedures that have a biennial or triennial frequency must be changed to "N/A" if they are not required to be completed during the inspection cycle and were not completed in a previous year of the triennial or biennial period. If they are required to be completed during that cycle, the completion status remains "Incomplete" until the required minimum sample size is reached for the

procedure or it is declared "complete". The completion status of biennial procedures completed during the first year of the biennial period, and triennial procedures completed during the first or second year of the triennial period, will be reported as "Completed in previous year(s)" for IPCs subsequent to the year in which the procedure was completed. For example; the status of a triennial procedure completed in the second year of the triennial period would be reported as "N/A" for the first year, "Complete" for the second year, and "Completed in previous year(s)" for the third year. Similarly, the status of a biennial procedure completed in the first year of the biennial period would be reported as "Complete" in the first year, and "Completed in previous year(s)" for the second year.

- e. A procedure can also be declared "Complete" by the branch chief (or designee) with less than the minimum sample size or zero samples completed in the following instances:
1. If all requirements of the procedure are met by work done in other procedure(s) or at related facilities or units. The completion status is entered as "Complete by Reference."
  2. Several baseline inspection procedures do not have a specific implementation frequency but are implemented "as required" on an annual basis. The completion status of inspection procedures that are implemented "as required" (e.g.; IP 71111.16, Operator Workarounds) are reported as "Complete" when the minimum sample size has been inspected. However, if, at the end of the annual inspection cycle, the minimum sample size was not available to inspect, the procedure status is entered as "Complete - The minimum sample size was not available for inspection during the inspection cycle."
  3. Similarly, if the opportunity to apply the procedure was not available during the inspection cycle the procedure status is entered as "Complete - The opportunity to apply the procedure was not available during the inspection cycle."

For these instances the actual sample size that was inspected is to be reported in RPS. If no samples were inspected, "0" is to be entered as the sample size. Once the procedure is declared "Complete," the procedure will be considered 100% complete for program completion purposes (RPS IR Report 8), even though less than the required minimum sample size is reported in RPS.

- f. The procedure completion status codes reported in RPS/IP are defined as follows:
1. Incomplete. All required items identified in the procedure have not been completed. The minimum number of required samples, as defined in the procedure, has not been inspected.
  2. Complete. All items identified in the procedure are completed, including inspection of the minimum number of required annual samples. Each procedure defines what constitutes a sample and how many annual samples are required for the given procedure.
  3. Complete - by Reference. All requirements of the procedure are met by work done in some other procedure(s) or at related facilities (other units). The inspector will not repeat the inspection, but will simply reference the other inspection(s) as the basis for demonstrating that all procedure requirements are completed. For planning and reporting purposes, the procedure is



considered complete for the Completed by Reference facility. A specific comment must accompany this selection explaining how it is valid.

4. Complete - full sample not available. The minimum sample size was not available for inspection during the inspection cycle. Note that the sample definition of some procedures require the performance of multiple steps or inspection of specific activities. In these cases, all steps must be performed and all activities must be inspected for the sample to be considered complete. If any of the specific actions cannot be performed because it is not available, then the sample is not considered "complete". For example; IP 7111108 requires multiple steps for a BWR sample. If any of these steps cannot be completed, the sample is incomplete. However, the procedure can be declared "complete - full sample not available" since the minimum sample size was not available for inspection. A specific comment must accompany this selection explaining how it is valid.
  5. Complete - opportunity to apply procedure not available. The opportunity to apply the procedure was not available during the inspection cycle. A specific comment must accompany this selection explaining how it is valid.
  6. Not Applicable (N/A). The procedure is not applicable to the specific plant or site, or is not scheduled during the current IPC and was not completed in a previous year of the triennial or biennial period. Only biennial and triennial procedures which were not scheduled to be completed during the current IPC and were completed in a previous year of the biennial or triennial period can be "N/A". Procedures that have a completion status of "N/A" are not included in the calculation of program completion.
- g. The information on completion status and completed samples entered in RPS is used to track baseline completion for each reactor site and to develop the monthly and annual completion status of the overall baseline inspection program for the ROP (RPS/IR Reports 8 and 9). The completed sample size and procedure completion status should be updated in RPS as soon as practical after completion of the inspection, but no later than 14 days after the inspection report is issued. This ensures accurate and timely reporting and that proper credit is given.
- In order to preserve the integrity of reports generated after end of year, changing a "Complete" status to "Incomplete" or "N/A" will not be allowed more than 60 days after end of cycle.
- h. The following examples illustrate how to determine the completion status and sample size.

#### Example 1

The resident inspectors perform a baseline IP that is implemented quarterly requiring the review of twelve samples annually to be considered complete (three samples per quarter). The inspectors review only one sample and plan to review additional samples during the next quarter. The branch chief (or designee) enters a completed sample size of "1" and the status of this IP remains as "Incomplete."

During the next quarter, the resident inspectors review three additional samples. The branch chief (or designee) enters the completed sample size as "3" and the status of the IP remains as "Incomplete." When the cumulative completed sample size reaches "12", the branch chief (or designee) changes the status to "Complete."

### Example 2

The resident inspectors perform a baseline inspection procedure requiring the review of seven samples to be considered complete. Only five samples meeting the procedure's criteria were available for review during the inspection cycle, but the intent of the inspection was met to the greatest extent practical. At the end of the inspection cycle, or when it is determined that additional samples will not be available during the inspection cycle, the branch chief (or designee) enters "Complete -The minimum sample size was not available for inspection during the inspection cycle" as the status of this procedure with a sample size of "5".

### Example 3

A baseline inspection procedure that is to be completed "as conditions require" was *not* performed during the annual inspection cycle. If, at the end of the annual cycle there were no opportunities to perform the inspection, the branch chief enters "Complete - The opportunity to apply the procedure was not available during the inspection cycle" as the status of this procedure with a sample size of "0".

- i. The completion status of all baseline procedures, by region or by site, can be obtained in RPS/IR Report 8 by selecting or entering the appropriate parameters requested in the report.

In addition, RPS/IR Report 9 is available to complement the information in RPS/IR Report 8. Report 9 provides a summary of the number of completed samples for all ROP inspection cycles, by site, for all baseline procedures. This summary provides a ready determination of completion for those procedures that have biennial and triennial frequencies. (Please note that prior to the 2003 inspection cycle there was no definitive guidance for the number of samples required for completion nor a clear definition of what constitutes a sample. As a result, the data in these two reports prior to IPC 33 may not be consistent with current numbers and should not be used without confirming their accuracy).

RPS/IR Report 7, "By Procedure Status Report," provides an option to select the ROP completion status to report on. For example, selecting the option of incomplete will generate a report showing all the procedures that have an incomplete status.

**05.04 Charging Time for ROP Activities.** Time spent performing activities in support of the ROP is entered into the Human Resource Management System (HRMS) in accordance with guidance promulgated by the Office of the Chief Financial Officer (OCFO), NRR, and the regions. The data are uploaded to RPS by the office/regional HRMS coordinator normally on a weekly basis. In order for scheduled activities to appear in the HRMS, schedule updates in RPS must be completed no later than Thursday of the prior week.

- a. Inspection Activities. Inspection Program Element (IPE) and activity codes are to be used for both direct and non-direct inspection efforts associated with performing docket-specific activities under the ROP. IPE codes are used with the inspection procedures to document the type of inspection performed (e.g., for baseline direct inspection effort use IPE code BI, inspection procedure number, and docket number). Activity codes are used to charge Non-Direct inspection activities to the inspection report. An inspection procedure number is not used with activity codes (e.g.; for baseline inspection documentation use activity code BID, inspection



report number, and docket number). The most up to date IPE and activity codes is available through the RPS “How do I” web page at: <http://nrr10.nrc.gov/rps/how-do-i/activitycodes.pdf>. The table consisting the IPE and activity codes are intended to be all-inclusive (i.e., the only codes to be used) for any inspection-related activities necessary to support the ROP; therefore, the table also includes several preexisting IPE and activity codes. Inspectors are encouraged to review HRMS literature and training manuals for a description of HRMS terms and the proper fields for time entry of ROP activities in HRMS. Note that time must be reported accurately because licensees are billed on the basis of the reported data. Inspection hours should be charged to the specific unit on which the inspection was performed. In addition, NRC analyses of the reported data are used for further program refinements and budget formulation.

- b. Assessment Activities. As described in the IPE and activity codes table, all assessment related effort is charged to the “ASM” activity code. This should include time spent preparing for and conducting all assessment activities, (including quarterly, mid-cycle, and end-of-cycle reviews), as well as any ongoing assessment activities. An annual inspection report number (as defined in Section 05.05) is reserved for each plant at the beginning of the IPC, and all assessment effort associated with the given plant throughout the year should be charged to that report number. The assessment report number reserved for each plant is based on the year of the next annual end-of-cycle assessment letter (i.e., the Annual Assessment letter for CY2002 would be 05000###/2003001). Separate report numbers should *not* be reserved for assessment followup letters or the mid-cycle letter.
- c. General Guidance. The most up to date general guidance on time and labor reporting for inspection related activities is available through the RPS “How do I” web page at: <http://nrr10.nrc.gov/rps/how-do-i/timelaborreporting.pdf>.

#### 05.05 Inspection Report and Item Numbering

- a. All reports and letters for a given unit shall be uniquely numbered using the RPS Inspection Report Tracking System (IRTS) module to allow for clear, simple tracking. Each report or letter should be classified by type using the available drop down menu. The timeliness goals should reflect the number of elapsed days since the “event date.” The event date is the end date of the pertinent inspection period in which the item was identified as an AV, finding (FIN), violation (VIO), or non-cited violation (NCV). This may or may not correspond to the final exit meeting date, depending on the type of inspection being conducted.
- 1. The first report number for each year shall be the Annual Assessment letter of the previous year and each subsequent letter or report shall be numbered sequentially. The numbering should take the following format:

05000###/YYYY\*\*\*

where ### is the docket number, YYYY is the year, and \*\*\* is the sequential report number. (i.e., The Annual Assessment letter for CY2004 would be

05000###/2005001.) Verify the correct IPC is associated with the report when it is generated.

2. Every inspection report, final significance determination letter, traditional enforcement letter and Notice of Violation letter should also be given a report number. The numbers should be the next available number for the given site and will be used to track issues from initial finding through final closeout.

b. Inspection Report Item Numbering

1. An item number is required for each item identified in the inspection report, including each of the five type codes- violation (VIO), non-cited violation (NCV), apparent violation (AV), finding (FIN), and unresolved item (URI). For all licensed facilities, the item number for items identified in an inspection report consists of the item type followed by the docket number, the inspection report number, and a 2-digit item number (\$\$) in the following format:

<type> 05000###/YYYY\*\*\*-\$\$

Examples of inspection report item numbers are  
URI 05000346/2000004-01, FIN 05000285/2001003-02, and  
VIO 05000443/2000301-03.

Refer to IMC 0612 for more information regarding item numbering.

2. The first item identified in the inspection report begins with "01" and each subsequent item is numbered in sequential order, regardless of type. In a report covering only one unit, each item is tracked separately. Items common to two or more units will have the same item number for each unit; the docket number and the associated inspection report number distinguish the unit to which the item applies. An item number shall be unique for each distinct inspection finding.

The following examples illustrate proper item numbering for single- and dual-unit sites:

Item Numbering for Single-Unit Site				
Item	Docket	Report	Seq.#	Remarks
1 <sup>st</sup> VIO	05000346	2001001	01	
1 <sup>st</sup> URI	05000346	2001001	02	
2 <sup>nd</sup> VIO	05000346	2001001	03	
1 <sup>st</sup> FIN	05000346	2001001	04	
Item Numbering for Dual-Unit Site				

1 <sup>st</sup> URI	05000295	2001002	01	1 <sup>st</sup> unit 1 item
2 <sup>nd</sup> URI	05000304	2001002	02	1 <sup>st</sup> unit 2 item
1 <sup>st</sup> FIN	05000295	2001002	03	both units
	05000304	2001002	03	
2 <sup>nd</sup> FIN	05000295	2001002	04	
1 <sup>st</sup> VIO	05000295	2001002	05	both units
	05000304	2001002	05	

3. A new PIM entry must be created for each new item identified in an inspection report. The report or letter number shall be associated with the given item in the PIM. When a report or letter follows up on an existing item, the PIM entry must be updated to reflect the new information. This is to ensure the report or letter is associated with the original item in the PIM to provide traceability of an issue from discovery to final resolution. Step-by-step guidance for adding and updating PIM items is located at:

Adding: <http://nrr10.nrc.gov/rps/how-do-i/ir-add-item-to-specific-rpt.htm>

Updating:

<http://nrr10.nrc.gov/rps/how-do-i/ir-add-open-item-to-another-rpt.htm>

4. URIs or AVs that are later determined to be FINs or VIOs are updated in RPS based on the inspection report that documents the resolution of the URI or AV. URIs or AVs should not be closed and reopened as a FIN or VIO, but should be updated to reflect the change in status. The event date should be changed as necessary to reflect the date for which the item was identified as an AV, FIN, VIO, or NCV.

- c. When a report or letter discusses an individual item, that report or letter shall be associated with the given item in the PIM. Following the issuance of a report or letter, PIM entries should be created or updated for each item discussed in the RPS/IR module. Step-by-step guidance for entering sample size is available through the RPS "How do I" web page at:

(<http://nrr10.nrc.gov/rps/how-do-i/ir-adding-samples.htm>).

A new PIM entry must be created for each new item identified in an inspection report. When a report or letter follows up on an existing item, the PIM entry must be updated to reflect the new information. This is to ensure the report or letter is associated with the original item in the PIM to provide traceability of an issue from discovery to final resolution.

#### 05.06 Entering and Updating Inspection Findings in the Plant Issues Matrix (PIM)

- a. The PIM provides a consolidated listing of individual plant issues (i.e., inspection findings) that the NRC uses to assess plant performance. All entries in the Summary of Findings of the inspection reports and all issues given an item number are entered into the PIM, with the exception of URI's. The PIM shall be updated as soon as practical after the issuance of the report but no later than 14 days. PIM entries are the vital link between inspection reports and information posting to the ROP Web page. In order to ensure information posted to the Web is accurate, PIM entries must be timely and complete.

Inspection findings are entered into the PIM via the RPS Item Reporting (RPS/IR) module. A typical PIM entry includes the type, title, cornerstone, significance determination, event date, who identified the finding, item description and significance description, source document (normally the inspection report number), and a brief summary of corrective actions planned or completed. PIM entries must be updated when additional reports or letters (i.e., final SDP letters and supplemental inspection reports) are issued to provide traceability of an issue from discovery to final resolution. In other words, any given issue should be discussed and updated in a single PIM entry, and duplicate entries should not be made when the status has changed (i.e., upon the resolution of a URI, after the issuance of the final SDP letter). A sample PIM entry for a greater-than-green finding, along with a summary of the process, is included in Section 05.06.e.

b. Special Cases and Examples

1. Unresolved Items (URIs). If an item remains unresolved upon issuance of an inspection report, it is designated as a "URI" in accordance with IMC 0612. URIs are documented in the body of an inspection report and assigned a tracking number. URIs are entered into RPS under the applicable cornerstone, with a type code of "URI," and a significance determination of "N/A" (not applicable).
2. Significance to Be Determined. The final risk significance and compliance determination of an issue are determined during the significance and enforcement review process. Prior to the final determination, issues that appear to be in noncompliance with regulatory requirements and/or may be evaluated as potentially greater-than-green are considered apparent violations whose significance has yet to be determined. These issues are entered into RPS under the applicable cornerstone, with a type code of "AV," and a significance determination of "TBD" (to be determined). The "event date" is the end of the pertinent inspection period for integrated inspection reports and the exit date of the inspection for team and other special inspection reports.

After the Significance and Enforcement Review Panel (SERP) determines the initial risk significance of the finding, the type code will be changed to "FIN", "VIO", or "NCV," as applicable, but the significance will remain "TBD." Once the final characterization is confirmed and the final significance determination letter has been issued, the item description and significance determination is updated in the PIM per the guidance at the RPS "How do I

site” <http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf> to reflect the latest information. The "event date," however, does not change.

3. Cross Cutting Issues. Findings related to cross-cutting issues that are identified during routine baseline inspections and documented in inspection reports are in the PIM as part of the entry for the associated inspection finding. For each inspection finding, cross-cutting issues can be identified by checking the appropriate box for the issue. A summary conclusion regarding the effectiveness of the PI&R program resulting from the biennial PI&R inspection (IP 71152B) is entered into the RPS/IR under the Miscellaneous cornerstone as type code FIN with N/A as the significance.
4. Performance Indicator (PI) Verification Issues. Issues related to PI verification are documented in the PIM only if correcting the data causes or would have caused the PI to cross a threshold. Such issues are documented in the PIM with “Miscellaneous” for the cornerstone, “VIO” or “NCV” for the type code, and the severity level of the violation for the significance determination. Each PI verification issue is a separate entry.
5. Supplemental Inspection Results for PIs. Issues from supplemental inspections that were conducted in response to a PI that crossed a threshold are entered in the PIM under the applicable cornerstone, with “FIN” for the type code and “N/A” for the significance determination. These issues are not assigned the color of the PI that was crossed; this prevents inadvertent double-counting. Any additional inspection findings identified during the supplemental inspection beyond the scope of the original issue(s) are entered in the PIM as separate entries and are assigned the appropriate significance via the SDP.
6. Supplemental Inspection Results for Inspection Findings. A paragraph summarizing the results of a supplemental inspection performed to address a White or greater inspection finding is added to the original PIM entry for the original inspection finding. These results are entered into RPS using the procedure at the online module for old/updated items available the RPS “How do I” web page at <http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf>. Additional inspection findings identified during the supplemental inspection beyond the scope of the original finding(s) are entered in the PIM as new entries, in accordance with the procedure for new items in the online module and are assigned the appropriate significance via the SDP.
7. Independent Items. In the RPS/IR module, under “Topics” the “Independent Items” are used to track information from sources other than inspection reports. The regions should use the Independent Item feature of the RPS/IR module to track licensee event reports (LER), issues identified under 10 CFR Part 21, and other items; however independent items are not included in the PIM because PIM entries are limited to “Report Items.” Any significant issue(s) that did not originate in an IR must be discussed and referenced in the next resident report and then entered into the PIM if the NRC will use the issue(s) to assess plant performance (as in the investigation of a harassment



and intimidation case by the NRC's Office of Investigation). However, the NRC staff shall take care to ensure that previously undocketed information that was not intended for public release is not introduced into the inspection reports and the PIM.

- c. Producing PIM Reports. Under the ROP, RPS/IR Report 4, "ROP PIM Report," may be used to request a PIM report by site, docket, or region for a specified time period. By default, PIM reports are sorted by cornerstone and the time frame is from the day the report is requested back a full year; however users may select different sorting criteria and time frames.

Non-ROP related PIM reports can still be obtained using RPS/IR Report 3, "Non-ROP PIM Report," for inspection findings for any site and time period prior to initial implementation of the ROP (before April 2000). Additionally, the RPS Dynamic Web Site provides numerous categorized reports.

- d. Plant Inspection Findings Web Page. The information in the PIM is used to generate a summary of inspection findings used to assess plant performance. The Plant Inspection Findings Web page displays this summary, the current applicable findings for each plant. This Web page is the subset of the PIM actually used to assess plant performance and includes all issues designated as VIO, FIN, or AV as well as NRC identified and self revealing NCVs. The information available on the Plant Inspection Findings Web page and Performance Indicators Web page should summarize all of the information used for plant assessment and a plant's subsequent placement in the Action Matrix.

Findings and PIs in the Physical Protection cornerstone will not be made public nor used as inputs into the Action Matrix, although they will be entered into RPS. However, any historical data entered before the third quarter 2004 will still remain available on the Web page. NRC employees may gain access to the current Physical Protection PIs and inspection findings by accessing ROP Digital City through the internal web.

- e. Sample PIM Entry/ Inspection Finding Display on Web.

Below is a sample web display for a typical greater-than-green finding that has been processed through the SDP and the supplemental inspection has been completed. Additional guidance for making and revising PIM entries is available at: <http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf>

Initial Entry: In this example, the initial preliminary finding was entered into the PIM in RPS/IR a few days after the inspection report was issued that identified this item as an apparent violation (IR# 05000xxx/2003012 dated November 8, 2003). The text was taken from the IR's summary of findings and entered in the "item description/significance" field. The type was entered as "AV" and the significance was entered as "TBD." The "event date" was entered corresponding to the end of the inspection period (September 30, 2004).

First Update: The original PIM entry was updated in RPS/IR shortly after the final

SDP letter was issued (IR# 05000xxx/2003015 dated December 21, 2003). The additional text summarizing the final significance determination was added to the "item description/ significance" field. The type was changed to "VIO" and the significance was changed to "WHITE." The IR# for the final SDP letter was added to the "History Tab" resulting in the IR# being included at the bottom of the web entry with a hyperlink to the report itself. The event date was not changed.

Second Update: The original PIM entry was updated in RPS/IR shortly after the supplemental inspection report was issued (IR# 05000xxx/2004004 dated March 14, 2004). The additional text summarizing the supplemental inspection results was added to the "item description/ significance" field. The IR# for the supplemental inspection report was added to the "History Tab" resulting in the IR# being included at the bottom of the web entry with a hyperlink to the report itself. Again, the event date was not changed.

This example demonstrates the process necessary to ensure that the PIM entries on the web provide traceability of an issue from discovery to final resolution. The updates to the ROP Web page will occur in accordance with the schedule described in section 05.07(e) or as soon as possible if there is a known change in licensee performance and resultant NRC actions. In order to update the web in a timely manner, regional staff must notify NRR's Performance Assessment Branch (IPAB) staff any time they reach a final determination or obtain clarifying information affecting a plant and its placement in the ROP Action Matrix Summary as described in section 05.07(c). The finding will appear on the Plant Inspection Findings Web page for four quarters from the original finding date unless specific actions are taken to hold the finding open in accordance with IMC 0305.

**Significance:** WHITE

Date: September 30, 2003

Identified By: NRC

Item Type: VIO Violation

**Failure to Prepare a Shipment of Radioactive Waste to Satisfy External Package Radiation Level Limits**

An apparent violation was identified for the failure to prepare a package of radioactive material for shipment so that the radiation level does not exceed 200 millirem/hour at any point on the external surface of the package. Package surface radiation levels in excess of 200 millirem/hour were identified by a waste processing contractor upon receipt of the shipment from the licensee.

The finding was more than minor because it was associated with the "Program and Process" attribute of the Public Radiation Safety Cornerstone, and affected the cornerstone objective of ensuring adequate protection of public health and safety from exposure to radioactive materials.

(IR# 05000xxx/2003012 dated November 8, 2003)

The finding was determined to be of low to moderate safety significance (White) because the transportation problem involved an external package radiation level that exceeded limits by 25 percent and because the area of elevated radiation on the package was determined to be accessible to a member of the public during conditions normally incident to transportation.

(IR# 05000xxx/2003015 dated December 21, 2003)

The NRC performed a supplemental inspection to assess the adequacy of the licensee's evaluation, extent of condition/cause review and associated corrective actions. The inspector determined that the licensee performed an adequate evaluation of the specific performance issue and that comprehensive corrective actions were completed to address each of the specific causes.

(IR# 05000xxx/2004004 dated March 14, 2004)

Inspection Report# : [2003012\(pdf\)](#) [hyperlink to original IR]

Inspection Report# : [2003015\(pdf\)](#) [hyperlink to final SDP letter]

Inspection Report# : [2004004\(pdf\)](#) [hyperlink to supplemental IR]

## 05.07 ROP Web Posting Process and Schedule

- a. Performance Indicators. Licensees submit PI data to the NRC on a quarterly basis in accordance with NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," which the NRC endorsed in Regulatory Issue Summary (RIS) 00-08, "Voluntary Submission of Performance Indicator Data," and subsequent revisions and endorsements. Licensees submit quarterly PI data to the NRC within 21 days following the end of the reporting period. Specifically, the reporting periods are the four quarters within a calendar year (i.e., Q1 is January 1 - March 31, Q2 is April 1 - June 30, Q3 is July 1 - September 30, and Q4 is October 1 - December 31).

Within 2 business days after receiving of the licensees' data transmissions, the NRC posts the PI data, indicator values, and associated graphs on the agency's internal ROP Web page to give the regions an opportunity to review the PIs and determine the action matrix designations and to identify any obvious errors prior to public release. For final dissemination, 35 days following the end of each quarter, the NRC places the PIs on the agency's external ROP Web page to make

them available to external stakeholders along with the latest inspection findings and action matrix designations, as discussed below.

In addition, licensees are expected to submit changes to PI data as soon as practical, but no later than the end of the quarter, following discovery of an error especially when that error causes a threshold to be crossed. The NRC then updates the ROP Web page accordingly following receipt of the corrected PI data.

- b. Inspection Reports. The regions are responsible for entering inspection reports into ADAMS in accordance with the ADAMS template. The regions also update the PIM in RPS to reflect the latest inspection findings in accordance with this manual chapter. In order to support posting these documents to the ROP Web page, inspection reports must be (1) processed and declared in ADAMS so they are posted as “.pdf” files, (2) placed in the applicable site subfolder within the “Power Reactor Correspondence” folder of ADAMS, and (3) [ROPreports@nrc.gov](mailto:ROPreports@nrc.gov) should be included on the ADAMS distribution list so an email is sent as each report is completed. IPAB will use this information to locate and copy all issued inspection reports for posting to the Web server in accordance with branch operating procedures.

The latest available PIM entries (from the RPS/IR module) and inspection reports (from ADAMS) are posted to the ROP Web page along with the related PIs 35 days after the end of each quarter and 60 days following the end of each quarter. The purpose of the second posting is to include any newly issued inspection reports from late in the previous quarter so that the ROP Web page reflects a complete picture of PIs and inspection findings from the previous quarter in a timely manner.

In addition, PIM entries and related inspection reports that reflect a change in color designation are posted as soon as practical after the docketed information becomes available. These updates include the final significance determination that resulted in a risk significance that is more than very low significance (i.e., white, yellow, or red) or a final enforcement decision that resulted in a notice of violation being issued.

- c. Action Matrix Summary (AMS). Each region submits a quarterly email message (see sample below) detailing the AMS column assignments for all plants in the region using the guidance in IMC 0305 and the information available on the ROP Web page. This email message is due to IPAB on or before the 30<sup>th</sup> day following the end of each calendar quarter. Email messages should be sent to [ROPreports@nrc.gov](mailto:ROPreports@nrc.gov). Using this input, IPAB then posts the AMS to the ROP Web page. The basis submitted by each region serves as the footnote on the AMS to explain each plant that does not appear in the Licensee Response column.

In addition to quarterly inputs, regional staff shall submit the ROP AMS column assignment and basis changes any time they reach a final determination or obtain clarifying information affecting a plant and its placement in the ROP AMS. Before submitting this new information, the regional staff should promptly update the PIM entries so that information can be verified and included on the ROP Web page.

Part I:

Licensee Response column:

Plant A

Plant B

etc...

Part II:

Plant X is in the Regulatory Response column due to one White inspection finding in the Emergency Preparedness cornerstone originating in 2Q2004. Additionally, the one Red inspection finding in the Mitigating Systems cornerstone originating in 4Q2003 is being considered as an Old Design Issue in accordance with IMC 0305, and is not considered as an input to the Assessment Program.

Plant Y is in the Degraded Cornerstone column due to one Yellow inspection finding in the Mitigating Systems cornerstone originating in 3Q2002. This finding is being held open, in accordance with IMC 0305, for greater than 4 quarters because (...give details from the correspondence to licensee describing the extension on the inspection finding).

Plant Z is in the Multiple/Repetitive Degraded Cornerstone column due to one Yellow inspection finding in the Public Radiation Safety cornerstone originating in 1Q2003 and three white issues in the reactor safety strategic performance area, including one White PI in the Initiating Events cornerstone, one White inspection finding in the Mitigating Systems cornerstone originating in 3Q2003, and one White inspection finding in the Barrier Integrity cornerstone originating in 2Q2003. Additionally, in accordance with IMC 0305, the staff plans to deviate from the ROP Action Matrix to implement regulatory actions described in the Degraded Cornerstone column per the assessment followup letter dated May 5, 2004.

- d. Assessment Letters and Inspection Plans. Similar to the inspection reports, the regions are responsible for entering assessment letters and inspection plans into ADAMS in accordance with the ADAMS template. In order to support posting these documents to the ROP Web page, these documents must be properly entered and declared in ADAMS and should be placed in the appropriate site subfolder within the "Power Reactor Correspondence" folder of ADAMS. Additionally, all issued assessment letters and inspection plans are sent to [ROPreports@nrc.gov](mailto:ROPreports@nrc.gov) for transfer to the Q:\ drive and posting to the Web server in accordance with branch operating procedures.

The assessment letters and inspection plans are typically posted to the ROP Web page 70 days following the end of the reporting period. In accordance with IMC 0305, Mid-Cycle letters and Annual Assessment letters are issued for all plants approximately 9 weeks after the completion of the second and fourth calendar quarters respectively. These letters have inspection plans (RPS/IP report 22) attached to provide a schedule of NRC inspections for approximately 18 months as specified in IMC 0305. Assessment Follow-up letters are issued approximately 7 weeks after the completion of the first and third calendar quarters only for those plants that crossed performance thresholds. Assessment Follow-up letters do not



include updated inspection plans, although they may note any inspection plan changes associated with forthcoming supplemental inspections.

- e. ROP Web Page Updates and Schedule. The table below provides a schedule summarizing the planned updates to the ROP Web page. The ROP Web page will also be updated on an “as needed” basis to correct any discrepancies or noted omissions in previously posted information, or if there is a known change in licensee performance and resultant NRC actions. For example, the inspection findings and/or PIM would be updated to reflect a final significance determination that resulted in a risk significance that is more than very low significance (i.e., white, yellow, or red) or a final enforcement decision that resulted in a notice of violation. Similarly, the ROP Web page would be updated to reflect performance indicators based on a licensee’s PI change submittal that caused a threshold to be crossed. In both cases, the Action Matrix Summary would be updated at this time to reflect the changes.

<b>Information</b>	<b>Days following the end of the calendar quarter</b>
Licensees submit Performance Indicators	21 days
Performance Indicators on internal Web site	23 days
Regions submit email message concerning Action Matrix Summary assignments for all plants and the basis for each plant not in the Licensee Response column	30 days
Performance Indicators, available PIM entries and inspection reports, and Action Matrix Summary on external Web site	35 days
PIM and IR update to complete posting of <b><i>all</i></b> inspection findings for the previous quarter	60 days
Assessment Letters (EOC, mid-cycle, or quarterly followup) on external Web site	70 days

END