

SIGNIFICANCE DETERMINATION PROCESS

0609-01 PURPOSE

The Significance Determination Process (SDP) uses risk insights, where appropriate, to assist NRC staff in determining the safety or security significance of inspection findings identified within the seven cornerstones of safety at operating reactors. The SDP is a risk-informed process and the resulting safety or security significance of findings, combined with the results of the risk-informed performance indicator program, is used to determine a licensee's level of safety performance and the level of U.S. Nuclear Regulatory Commission engagement with the licensee in accordance with Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program". Each appendix to IMC 0609 supports a cornerstone(s) associated with the strategic performance areas as defined in Management Directive (MD) 8.13, "Reactor Oversight Process" and the baseline inspection program as outlined in Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase" and IMC 2201, "Security and Safeguard Inspection Program for Commercial Power Reactors."

0609-02 OBJECTIVES

02.01 To characterize the safety or security significance of inspection findings for the NRC Reactor Oversight Process (ROP), using best available risk insights as appropriate.

02.02 To provide all stakeholders an objective and common framework for communicating the potential safety or security significance of inspection findings.

02.03 To provide a basis for timely assessment and/or enforcement actions associated with an inspection finding.

02.04 To provide inspectors with plant-specific risk information for use in risk-informing the inspection program.

0609-03 APPLICABILITY

03.01 The SDP tools described in appendices to this IMC are applicable to inspection findings identified through the implementation of the NRC inspection program described in IMC 2515 and IMC 2201. Before determining safety or security significance of an inspection finding, each performance deficiency must be screened and determined to be "more than minor" using the guidance provided in IMC 0612, Appendix B, "Issue Screening" and Appendix E, "Examples of Minor Issues", as applicable. Violations with no associated performance deficiency cannot

become inspection findings and therefore will not be processed by the SDP. In addition, safety significant degraded conditions with no associated performance deficiency are not processed by the SDP, however, these degraded conditions may need to be addressed by other NRC processes (e.g., 10 CFR 50.109, Generic Safety Issue Program, rule-making).

03.02 A subtle yet extremely important and fundamental tenet of the SDP framework is that the deficient licensee performance (as later described and documented as the inspection finding) is the proximate cause of the degraded condition(s). As such, the degraded condition in and of itself (e.g., a non-functional safety-related pump) is not the deficient licensee performance, rather, the deficient licensee performance (e.g., inadequate maintenance procedure) is the proximate cause that led to the particular degraded condition(s). The SDP is designed to estimate the safety or security significance of a degraded condition(s) that was caused by deficient licensee performance above the baseline risk profile (see IMC 0308, Attachment 3, "Significance Determination Process Basis Document" for more details).

03.03 Nothing in this guidance relieves any licensee from fully complying with Technical Specifications, licensing basis commitments, or other applicable regulatory requirements. Continued compliance with regulatory requirements maintains the requisite defense-in-depth and safety margins necessary to achieve adequate protection of public health and safety.

03.04 The safety significance of reactor events caused or complicated by equipment malfunction and/or operator error are initially assessed by NRC staff in accordance with IMC 0309, "Reactive Inspection Decision Basis for Reactors" and Management Directive (MD) 8.3, "NRC Incident Investigation Program." Although the product of this risk evaluation may provide useful risk insights to NRC staff for event response or follow-up, it was not designed to determine the safety or security significance of inspection findings. Since the SDP is used to estimate the safety or security significance of degraded conditions caused by deficient licensee performance, including those that manifest themselves during events, any inspection findings associated with a reactor event should be processed in accordance with IMC 0609 and its associated attachments and appendices.

0609-04 DEFINITIONS

04.01 Applicable definitions are located in IMC 0612, "Power Reactor Inspection Reports" and supporting technical and program bases are located in IMC 0308, Attachment 3, "Significance Determination Process Basis Document"

04.02 Inspection findings are assigned a color representing the safety or security significance of the finding. The following definitions (04.02.a thru 04.02.d) include the quantitative and qualitative descriptions for each color and need to be applied appropriately to each SDP appendix listed at the end of this document. The symbol " Δ ", as used in the quantitative SDP appendices that use core damage frequency (CDF) and large early release frequency (LERF) as metrics, refers to the difference between the CDF (or LERF) resulting from the degraded condition(s) caused by deficient licensee performance and the nominal CDF (or LERF) of the unit. In other words, the quantitative SDP appendices are estimating the increase in risk resulting from a degraded condition(s) caused by deficient licensee performance (as articulated in the inspection finding) above a baseline risk profile. A graphical representation of the quantitative significance of findings is displayed in Exhibit 1.

- a. Red (high safety or security significance) is quantitatively greater than $10^{-4}\Delta\text{CDF}$ or $10^{-5}\Delta\text{LERF}$. Qualitatively, a Red significance indicates a decline in licensee performance that is associated with an unacceptable loss of safety margin. Sufficient safety margin still exists to prevent undue risk to public health and safety.
- b. Yellow (substantial safety or security significance) is quantitatively greater than 10^{-5} and less than or equal to $10^{-4}\Delta\text{CDF}$ or greater than 10^{-6} and less than or equal to $10^{-5}\Delta\text{LERF}$. Qualitatively, a Yellow significance indicates a decline in licensee performance that is still acceptable with cornerstone objectives met, but with significant reduction in safety margin.
- c. White (low to moderate safety or security significance) is quantitatively greater than 10^{-6} and less than or equal to $10^{-5}\Delta\text{CDF}$ or greater than 10^{-7} and less than or equal to $10^{-6}\Delta\text{LERF}$. Qualitatively, a White significance indicates an acceptable level of performance by the licensee, but outside the nominal risk range. Cornerstone objectives are met with minimal reduction in safety margin.
- d. Green (very low safety or security significance) is quantitatively less than or equal to $10^{-6}\Delta\text{CDF}$ or $10^{-7}\Delta\text{LERF}$. Qualitatively, a Green significance indicates that licensee performance is acceptable and cornerstone objectives are fully met with nominal risk and deviation.

04.03 Risk-Based - An approach to regulatory decision-making that is solely based on the quantitative results of a risk assessment.

04.04 Risk-Informed – An approach to regulatory decision-making that considers both quantitative and qualitative risk insights.

0609-05 RESPONSIBILITIES AND AUTHORITIES

All NRC inspectors are required to assess the significance of inspection findings in accordance with the guidance provided in this IMC. General and specific responsibilities are listed below.

05.01 Director, Office of Nuclear Reactor Regulation (NRR).

- a. Provide overall program direction for the ROP.
- b. Develop and direct the implementation of policies, programs, and procedures for regional application of the SDP guidance.
- c. Assess the effectiveness, uniformity, and completeness of regional implementation of the SDP.

05.02 Director, Office of Nuclear Security and Incident Response (NSIR).

- a. Provide overall program direction for the emergency preparedness and security cornerstones of the ROP.

- b. Develop and direct the implementation of policies, programs, and procedures for regional application of the **emergency preparedness and security SDP guidance**.
- c. **Provide oversight and representatives as necessary to support the SERP in order to ensure consistent and timely application of the process.**
- d. **Support the development, maintenance, and periodic implementation of appropriate training to ensure both technical staff and SERP decision-makers understand the program and process guidance.**

05.03 Director, Division of Inspection and Regional Support.

- a. Approve all **revisions to SDP appendices** and direct the development of future SDP **appendices** and improvements through periodic revisions based on new risk insights and feedback from users.
- b. Provide oversight and representatives as necessary to support the Significance and Enforcement Review Panel (SERP) in order to ensure consistent and timely application of the process.
- c. **Develop, maintain, and periodically provide appropriate training to ensure both technical staff and SERP decision-makers understand the program and process guidance, risk analysis techniques, and the treatment of uncertainty.**

05.04 Director, Division of Risk Assessment.

- a. Recommends improvements to all SDP **tools** using a probabilistic risk framework and **approves** changes to plant-specific risk insight information used by the SDP, based on new risk insights and feedback from users.
- b. Provide oversight and representatives as necessary to support the SERP in order to ensure consistent and timely application of the process.
- c. **Support the development, maintenance, and periodic implementation of appropriate training to ensure both technical staff and SERP decision-makers understand the program and process guidance, risk analysis techniques, and the treatment of uncertainty.**
- d. **As applicable, provide risk analysts with a general expectation that balances the amount of time and resources allocated in determining the safety significance of an inspection finding and the goal of providing a timely response.**

05.05 Director, Office of Enforcement.

- a. Ensure consistent application of the enforcement process to violations of NRC regulations with the appropriate focus on the significance of the finding.

- b. Provide representatives as necessary to support the SERP in order to ensure consistent application of the enforcement process.
- c. Coordinate with NRR (and NSIR when necessary) when revising agency documents used for communicating to the licensee about apparent violations and final determinations associated with the ROP.
- d. Support the development, maintenance, and periodic implementation of appropriate training to ensure both technical staff and SERP decision-makers understand the program and process guidance, risk analysis techniques, and the treatment of uncertainty.

05.06 Director, Office of Research.

- a. Based on user need requests, provide support in the development and refinement of the SDP tools and research activities (e.g., SAPHIRE, SPAR Models, NUREGs, NURER/CRs) to enhance the overall implementation of the SDP.
- b. Provide representatives, when requested, to support the SERP.

05.07 Regional Administrators.

- a. Provide program direction for management and implementation of the SDP to activities performed by the Regional Office.
- b. Maintain overall responsibility for, and apply regional resources as necessary, to determine the significance of specific inspection findings in a timely manner, using best available information consistent with the SDP timeliness goal and associated SDP timeliness metrics.

05.08 Director, Division of Reactor Projects and Reactor Safety.

- a. Provide oversight and representatives as necessary to support the SERP in order to ensure consistent and timely application of the process.
- b. Support the development, maintenance, and periodic implementation of appropriate training to ensure both technical staff and SERP decision-makers understand the program and process guidance, risk analysis techniques, and the treatment of uncertainty.
- c. Provide regional staff with a general expectation to balance the amount of time and resources allocated in determining the safety significance of an inspection finding and the goal of providing a timely response.

05.09 Senior Reactor Analysts (SRAs).

- a. Support NRC objectives related to the utilization of risk insights in the reactor inspection program, the SDP, and other risk-informed applications in the ROP.

- b. Provide regional management with updates on the expected amount of resources needed to appropriately characterize the safety significance of an inspection finding.
- c. Support the specific objectives as presented in Attachment 3 to this IMC.

0609-06 BACKGROUND

SECY-99-007, dated January 8, 1999, described the need for a method of assigning a risk characterization to inspection findings. This risk characterization is necessary so that inspection findings can be equivalently combined with risk-informed plant performance indicators (PIs) during the plant performance assessment process.

SECY-99-007A, dated March 22, 1999, provided a set of draft cornerstone SDP appendices for the purpose of initiating a pilot program at nine reactor sites to evaluate the efficacy of the proposed revisions for risk-informing the reactor inspection program. Other safety cornerstone SDP appendices that could not be related to core damage or containment failure risk used other rationale for assigning significance, as discussed in the respective appendices to this IMC.

SECY-00-49, dated February 24, 2000, provided the results of the pilot program for risk-informing the reactor inspection program and recommended proceeding with initial implementation of the new process at all licensed power reactor sites. The guidance in this IMC and related reactor inspection program guidance in IMC 2515 and IMC 2201 were subsequently issued in support of initial implementation. Enforcement associated with violations of regulatory requirements will continue to be processed in accordance with the current revision of the NRC Enforcement Policy, Enforcement Manual, and any applicable Enforcement Guidance Memoranda (EGMs).

0609-07 SDP DEVELOPMENT AND FEEDBACK PROCESS

07.01 SDP Development. The development of a new SDP or significant modification of an existing SDP should follow the general process used for original SDP development. This process should include the following general steps:

- a. The draft of the new SDP (or the significant modification) should receive a robust internal stakeholder review from both the regions and headquarters via periodic meetings, site visits, surveys, etc. Early external stakeholder input should also be solicited through public meetings (or closed meetings if discussions involve sensitive security-related information).
- b. A feasibility review should be performed by the lead organization (e.g., NRR, NSIR) to assess the adequacy of the proposed new SDP or significant modification. This review should specifically involve regional representation and should test the SDP (preferably with real examples, however, hypothetical inspection findings and violations can be used). Based on the results of the feasibility review, a pilot should be considered to evaluate the robustness of the proposed SDP and to ensure that appropriate outcomes

are achieved. The feasibility and/or pilot results should be documented in the applicable SDP technical basis document.

- c. Upon reconciliation of both internal and external feedback from the feasibility review and/or pilot, appropriate training on the SDP will be provided to NRC staff.
- d. After items 07.01a – c have been completed, the final SDP will be issued consistent with the requirements in IMC 0040, “Preparing, Revising, and Issuing Documents for the NRC Inspection Manual.”

07.02 SDP Feedback and Improvement. IMC 0801, “Reactor Oversight Process Feedback Program,” describes in detail the feedback process and feedback form used by the Office of NRR/Division of Inspection and Regional Support, to document problems, concerns, or difficulties encountered during implementation of the ROP guidance.

0609-08 SIGNIFICANCE AND ENFORCEMENT REVIEW PANEL (SERP) PROCEDURES

The following basic process is described in detail in Attachment 1 to this IMC.

08.01 Development of and Initial Characterization of Inspection Findings. All operating reactor inspection findings are generally discussed with licensee representatives during the inspection process and are formally presented at an exit meeting with licensee management at the conclusion of the inspection period. Initial significance determination is normally performed by the inspector using IMC 0609, Attachment 4, “Initial Characterization of Findings” and the applicable appendix of IMC 0609.

- a. If the inspector, with support from management as appropriate, determines that the finding is Green, then this would represent a final determination and be characterized as such at the exit meeting and in the inspection report.
- b. If the inspector cannot determine that the finding is Green, then the inspection finding will receive additional review(s) by the regional and/or headquarters staff. The staff will use the best available information to evaluate the significance of each finding in parallel with continuous inspection efforts to further develop the facts surrounding the finding. If, after further review by regional and/or headquarters staff, the significance of the finding is determined to be Green, then this would represent a final determination and characterized as such at the exit meeting and in the inspection report. However, if the organization responsible for the inspection finding evaluates the significance as either White, Yellow, Red, or Greater-than-Green (GTG), the significance determination is pending until an official review and decision by a SERP is completed.

NOTE: Although the official correspondence between the NRC and the licensee begins with the issuance of the inspection report and/or preliminary determination letter, the NRC should encourage licensees to provide information (e.g., existing engineering evaluations, risk analyses) during the inspection process to improve overall timeliness.

Documentation of the finding is performed in accordance with IMC 0612, “Power Reactor Inspection Reports.” If the staff’s significance determination of a finding is not complete at the time of issuance of the inspection report the finding will be characterized in the inspection report as “to be determined (TBD)”. No inspection finding can be characterized as a color other than Green in official NRC correspondence without the review and decision by a SERP.

08.02 Preliminary Significance Review and Decision. Any finding with a pending significance (see IMC 0612 for definition) of White, Yellow, Red, or GTG, will be reviewed and decided by the SERP (see Attachment 1 to this IMC for more detail). The result of the SERP review and decision represents the staff’s preliminary safety or security significance characterization. However, when a pending White, Yellow, or Red finding is determined to be Green by the SERP, this will represent a final determination and will be characterized as such in the inspection report.

08.03 Planning SERP. The purpose of the Planning SERP is to ensure the SERP decision-makers achieve alignment on the overall approach to characterize the significance of the inspection finding. Since the SERP decision-makers are involved, the Planning SERP is reserved for cases in which the Sponsor is planning to propose a GTG, White, Yellow, or Red significance characterization. Guidelines for conducting a Planning SERP are detailed in Exhibit 3 of IMC 0609 Attachment 1.

A Planning SERP should be convened as early as possible if:

- 1) The Inspection finding meets the entry criteria for IMC 0609, Appendix M, “The Significance Determination Process Using Qualitative Criteria” AND another SDP appendix (e.g., 0609, Appendix A, Exhibits 2 and 3) does not explicitly direct the use of IMC 0609, Appendix M, OR
- 2) The finding and associated degraded condition(s) are complex and involve extremely technical phenomena that require a significant amount of resources and coordination.

08.04 Obtaining Licensee Perspectives on Preliminary Significance. If the preliminary significance assessment of a finding is White, Yellow, Red, or Greater than Green, then the licensee will be given the opportunity to formally present additional information and perspectives at a public Regulatory Conference or in a written response on the docket. This opportunity will be offered in the cover letter of the inspection report or in the Preliminary Significance Determination letter (refer to Attachment 1). Either the cover letter or the Preliminary Significance Determination letter, should clearly state, with sufficient detail, the basis for the finding, preliminary significance determination, and any associated enforcement. The letter should also identify additional information and/or analyses that, if received in a timely manner in consideration of the SDP timeliness goal, could add fidelity to the final significance determination evaluation. The focus of the Regulatory Conference is to discuss the significance of the finding and not necessarily the root causes or corrective actions associated with the finding. The licensee may present differing views on the staff’s preliminary significance, present new facts, clarify existing information, and provide their evaluation of significance. Security-related matters will normally not be public, either at a conference or in correspondence.

The NRC should receive all additional information at a minimum of seven calendar days prior to the Regulatory Conference to allow the staff adequate time to review the information. In cases where a significant amount of information is provided, the licensee should consider providing the information earlier than seven calendar days. In determining an appropriate level of review, the NRC staff will consider the scope and breadth of the new information provided and the goal of making a timely regulatory decision. All written or electronic correspondence received from the licensee communicating their official response will be docketed. Any non-sensitive information provided by the licensee during the Regulatory Conference will be made public.

08.05 Final Significance Review and Decision. If the licensee accepts the staff's preliminary significance determination and does not intend to present additional information, then the staff will issue a final significance determination letter. If the licensee provides information on the docket by letter or participation in a Regulatory Conference, then the staff will convene either a Post-Conference Review or a Final SERP prior to making a final significance decision. If the SERP, after considering the licensee's additional information, determines that a preliminary White, Yellow, Red, or GTG finding is of Green significance, this is the final determination and will be communicated in the final significance determination letter in keeping with the SDP timeliness goals.

In the case where the staff has issued a preliminary significance determination of GTG and the licensee has not or cannot provide sufficient information to better inform the staff's significance determination in a reasonable period of time, then the staff should determine the final significance using the best available information rationale and document this rationale fully in a letter to the licensee. After the SERP reviews and decides on the final significance determination, the licensee will be informed of the results in a final significance determination letter in which the licensee will be informed of the SDP appeal process described in Attachment 2 of this IMC.

08.06 SDP Timeliness. The goal for SDP timeliness is to complete all final significance determinations within 90 days from the issue date of the first official correspondence that describes the finding. In order for the staff to effectively monitor, track, and trend SDP timeliness, the SDP timeliness goal is a metric in IMC 0307, Appendix A, "Reactor Oversight Process Self-Assessment Metrics."

The timeliness criteria below represent several time limits for each process milestone to support meeting the 90 day goal.

- T₀ - The issue date of the first official correspondence describing the finding, either in an inspection report and/or preliminary significance determination letter
- T₃₀ - Latest date to issue the preliminary significance determination letter
- T₇₀ - Latest date for completing the Regulatory Conference with licensee
- T₈₅ - Latest date to complete final SERP
- T₈₇ - Latest date to issue Enforcement Notification (EN) to the Commission
- T₉₀ - Final Determination letter issued

Successfully completing this process within 90 days can be dependent upon the timely completion of a public Regulatory Conference or review of a written response. As such, the timeliness criteria below represent additional time limits for each process milestone to support meeting the 90-day goal.

- T_{L0} - Issue date of the preliminary significance determination letter issued in an inspection report cover letter or as separate correspondence
- T_{L10} - Licensee informs the NRC within 10 days from the issue date of the notification of the preliminary significance determination, by phone or other means, of its intent to request a regulatory conference, to respond with a written submittal, or to decline the opportunity to provide additional information.
- T_{L33} - Licensee submits materials to be presented at the Regulatory Conference
- T_{L40} - Regulatory Conference completed or licensee's written response received by NRC no later than 40 days from the issue date of the preliminary significance determination letter.

08.07 Office of Investigation (OI) and Department of Justice (DOJ). Some findings may involve a formal OI or DOJ investigation. When an inspection finding involves a formal OI/DOJ investigation and it is known that the results of the investigation will not impact further evaluation of the finding's significance and/or follow-up inspection, then the finding should be resolved per the normal SDP process. If the OI/DOJ investigation does impact the timely resolution of the finding, then the guidance for a planning SERP should be implemented.

0609-09 PROCESS FOR LICENSEE APPEAL OF A STAFF SDP DETERMINATION

If a licensee disagrees with the staff's final determination of significance, the licensee may appeal the determination to the appropriate NRC Regional Administrator as described in Attachment 2 of this IMC. Any such review must meet the requirements stated in the Prerequisites and Limitations sections of Attachment 2 to merit further staff consideration.

0609-10 REFERENCES

1. IMC 0612, "Power Reactor Inspection Reports"
2. IMC 0612, Appendix B, "Issue Screening"
3. IMC 0308, Attachment 3, "Significance Determination Process Basis Document"
4. IMC 0609, Attachment 1, "The Significance and Enforcement Review Panel (SERP) Process"
5. IMC 0609, Attachment 2, "Process for Appealing NRC Characterization of Inspection Findings (SDP Appeal Process)"

6. IMC 0609, Attachment 3, "Senior Reactor Analyst Support Objectives"
7. IMC 0609, Attachment 4, "Initial Characterization of Findings"
8. IMC 0609, Appendix A, "Significance Determination Process for Findings At-Power"
9. IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria"
10. IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual"
11. SECY-99-007, "Recommendations for Reactor Oversight Process Improvements"
12. SECY-99-007A, "Recommendations for Reactor Oversight Process Improvements (Follow-up to SECY-99-007)"
13. SECY-00-0049, "Results of the Revised Reactor Oversight Process Pilot Program"

END

Exhibits:

Exhibit 1	Graphical Representation of the Quantitative Significance of Findings
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Attachments:

Attachment 1	Significance and Enforcement Review Panel Process
Attachment 2	Process for Appealing NRC Characterization of Inspection Findings (SDP Appeal Process)
Attachment 3	Senior Reactor Analyst (SRA) and Risk Analyst Support Expectations
Attachment 4	Initial Characterization of Findings

Appendices:

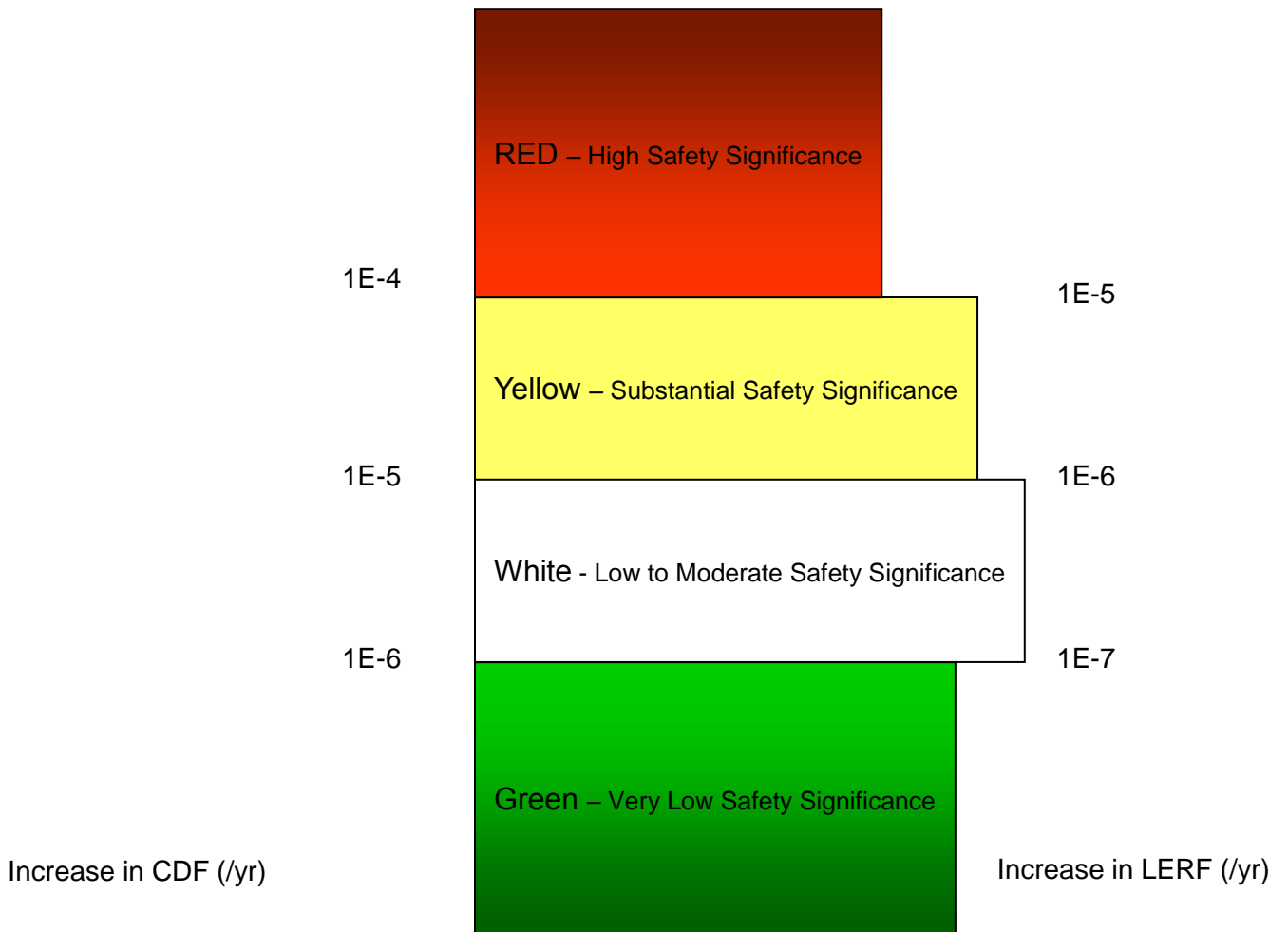
Appendix A	Significance Determination Process for Findings At-Power
Appendix B	Emergency Preparedness SDP
Appendix C	Occupational Radiation Safety SDP
Appendix D	Public Radiation Safety SDP

Appendix E	Part I, Baseline Security SDP for Power Reactors and Part II, Force-on-Force Security SDP for Power Reactors Part III, Construction Fitness-for-Duty Significance Determination Process for New Reactors (Pilot) Part IV, Cyber Security Significance Determination Process for Power Reactors
Appendix F	Fire Protection and Post-Fire Safe Shutdown SDP
Appendix G	Shutdown Safety SDP
Appendix H	Containment Integrity SDP
Appendix I	Operator Requalification, Human Performance
Appendix J	Steam Generator Tube Integrity SDP
Appendix K	Maintenance Risk Assessment and Risk Management SDP
Appendix L	Significance Determination Process for B.5.b
Appendix M	Significance Determination Process Using Qualitative Criteria

Exhibit 1

Graphical Representation of the Quantitative Significance of Findings

NOTE: Not applicable to all safety cornerstones and IMC 0609 appendices



Attachment 1

Revision History - IMC 0609

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	10/13/2006	Revision history reviewed for the last four years	N/A	N/A
N/A	04/21/2000 CN 00-007	This manual chapter supports the New Reactor Oversight Program for significant determination of findings. The significance determination process detailed in the manual chapter is designed to characterize the significance of inspection findings for the NRC licensee performance assessment process using risk insights, as appropriate.	N/A	N/A
N/A	02/27/2001 CN 01-005	0609 has been revised to correct minor errors and inconsistencies, and to clarify the overall SDP description.	N/A	N/A
N/A	08/16/2001 CN 01-015	0609 has been revised to correct the title of Attachment 2 (0609.02) as listed in the attachments to this manual chapter.	N/A	N/A
N/A	04/30/2002 CN 02-022	0609 has been revised to reflect revisions to Attachments 1 and 2, and changes to the recently issued Appendix A to IMC 0609.	N/A	N/A
N/A	05/19/2005 CN 05-014	0609 is revised to add Appendix K, "Maintenance Rule Risk Assessment and Risk Management" as an attachment.	N/A	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
NA	11/22/05 CN 02-030	0609 has been revised to reflect a concerted effort to provide guidance which will help meet the Commission's guidance on the timeliness for finalizing the significant determination of inspection findings. The revision includes the regional comments on the proposed guidance on how to meet the timeliness goal. The document continues to emphasize the importance of timely issuance of the final SDP result. However, complexity of issues, lack of evaluation tools, lack of expertise, and findings of high safety significance can contribute to delays in finalizing findings. To that affect, new guidance is provided in Section 08.05 of the document on how to approach such findings using the Planning SERP process.	N/A	ML061590493
N/A	01/10/08 CN 08-002	This revision provides the staff clarification to use IMC 0309, "Reactive Inspection Decision Basis for Reactors" in place of MD-8.3, to use Attachment 4 to perform SDP Phase 1 screenings, to incorporate feedback responses to add NSIR requirements, clarify guidance for SDP timeliness in regard to OI/DOJ investigations, and to add references to SDP Appendix M and the Attachment 4 for Phase 1 Initial Screening and Characterization attachment.	N/A	ML073460588

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	08/05/08 CN 08-023	This revision changes the term “choice” letter to “preliminary significance determination” letter and adds a third responsibility to OE in Section 05.05. The section on SDP Timeliness was clarified to eliminate literal interpretation of timeliness goals by the licensee. Replaced term AV(TBD) with (TBD) due to changes in IMC0612. Repetitive guidance that appears in both this IMC and Attachment 1 was removed and is in Attachment 1 only.	N/A	ML081720377
N/A	ML101400479 06/02/11 CN 11-009	This revision adds the new SDP Appendix L to list of SDP attachments, provides definitions for risk-based, risk-informed, and of the four color significance levels. A new Exhibit 1 was added that graphically describes the SDP. The IMC is better aligned with Attachment 1 – SERP, to remove redundancy. General clarifications of the guidance including receipt of additional information from the licensee within a reasonable period of time agreed upon between the staff and licensee. Clarifications were made that findings that originally SERP had reviewed as potential White, Yellow, Red, or > Green issues, then resulted in a final Green significance will not be counted in the timeliness goal. The IMC will reflect that the region be allowed to communicate the final result of these findings in the cover letter of the following quarterly inspection report or by separate letter. (ROPFF 0609-1480).	N/A	ML103490485

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	ML14153A633 04/29/15 CN 15-008	Several significant changes to the guidance were made based on recommendations from the SDP Business Process Improvement (BPI) Report (ML14318A512) and the ROP Independent Assessment Report (ML14035A571). Incorporated recommendations from ROPFF 0609-1676, 1886, and 1894.	N/A	ML15072A160 ML15082A305 ML14099A275 ML13197A402