

NRC INSPECTION MANUAL

IRIB

INSPECTION MANUAL CHAPTER 0611

POWER REACTOR INSPECTION REPORTS

Effective Date: 01/01/2018

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0611-01 PURPOSE

01.01 Convey the basic requirements and content for preparing power reactor inspection reports.

01.02 Provide requirements for documenting power reactor inspections and findings, violations, and observations.

0611-02 OBJECTIVES

02.01 Clearly communicate significant inspection results in a consistent manner to licensees, NRC staff, and the public.

02.02 Document the basis for significance determination and enforcement action.

02.04 Document inspection results as input into the Operating Reactor Assessment Program (Inspection Manual Chapter (IMC) 0305) of the Reactor Oversight Process (ROP).

0611-03 DEFINITIONS

The following terms along with those listed in IMC 0612, "Issue Screening" are applicable to documentation:

03.01 FIN. A Reactor Program Systems (RPS) item type used to describe a finding without a violation. A finding with an associated violation(s) or violation(s) dispositioned using traditional enforcement without a finding will be designated as AV, NCV, or NOV.

03.02 Observation. A factual detail noted during an inspection.

03.03 Sensitive Unclassified Non-Safeguards Information (SUNSI). Any information of which the loss, misuse, modification, or unauthorized access to can reasonably be foreseen to harm the public interest, the commercial or financial interests of the entity or individual to whom the information pertains, the conduct of NRC and Federal programs, or the personal privacy of individuals.

0611-04 RESPONSIBILITIES AND AUTHORITIES

04.01 General Responsibilities. Document inspections in accordance with the direction provided in this IMC.

04.02 Inspectors. Prepare power reactor inspection reports in accordance with the direction provided in this IMC.

- a. Ensure that inspection results are objectively supported and accurately documented.
- b. Ensure that inspection reports do not communicate regulatory determinations or actions not established in accordance with approved processes.

- c. Ensure referenced material is correctly documented.
- d. Ensure that the inspection report documents the conclusions presented to the licensee at the exit or re-exit meetings.

04.03 Branch Chiefs or Division Directors.

- a. Review each inspection report to ensure it is consistent with the direction provided in this IMC.
- b. Ensure the content, tone, overall regulatory focus, and timeliness of inspection reports are appropriate and support agency goals.

04.04 Division of Inspection and Regional Support – Reactor Inspection Branch.

- a. Provide interpretations and support for information contained in this IMC.
- b. Facilitate resolution of identified gaps in IMC directions and guidance.

0611-05 FINDINGS AND VIOLATIONS

The directions for completing the table sections below can be found by going to the sections referenced in the brackets.

The following table shall be used to document findings without violation:

Table 1 – Finding without Violation (FIN)

[05.01a - Title]			
Cornerstone	Significance	Cross-cutting Aspect	Report Section
[05.01b - Cornerstone]	[05.01c1 - Significance and Tracking]	[05.01d - Cross-Cutting Aspect]	[05.01e - Section]
[05.01f – Introduction and Identification]			
<u>Description:</u> [05.02a - Description] Corrective Action(s): [05.02b - Corrective Action(s)] Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)] <u>Performance Assessment:</u> Performance Deficiency: [05.03a - Performance Deficiency] Screening: [05.03b - Screening] Significance: [05.03c - Significance] Cross Cutting Aspect: [05.03d - Cross Cutting Aspect]			

Enforcement: The inspectors did not identify a violation of regulatory requirements associated with this finding.

[05.05 - Unresolved Item Closure]

The following table shall be used to document findings with violations being dispositioned using the ROP's SDP.

Table 2 – Finding with Violation

[05.01a - Title]			
Cornerstone	Significance	Cross-cutting Aspect	Report Section
[05.01b - Cornerstone]	[05.01c1 - Significance and Tracking]	[05.01d - Cross-Cutting Aspect]	[05.01e - Report Section]
[05.01f – Introduction and Identification]			
<u>Description:</u> [05.02a - Description] Corrective Action(s): [05.02b - Corrective Action(s)] Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)] <u>Performance Assessment:</u> Performance Deficiency: [05.03a - Performance Deficiency] Screening: [05.03b - Screening] Significance: [05.03c - Significance] Cross Cutting Aspect: [05.03d - Cross Cutting Aspect] <u>Enforcement:</u> Violation: [05.04b - Violation] Enforcement Action(s): [05.04c - Enforcement Action(s)] [05.05 -Unresolved Item Closure]			

The following table shall be used to document Traditional Enforcement (TE) violations without an associated finding. Refer to Section [0611-11](#) of this IMC when the violation involves enforcement discretion.

Table 3 – Traditional Enforcement Violation

[05.01a – Title]			
Cornerstone	Severity	Cross-cutting Aspect	Report Section
Not Applicable	[05.01c2 – Severity and Tracking]	Not Applicable	[05.01e - Section]
[05.01f – Introduction and Identification]			
<u>Description:</u> [05.02a - Description] Corrective Action(s): [05.02b - Corrective Action(s)] Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)] <u>Performance Assessment:</u> [05.03e – Traditional Enforcement Assessment] <u>Enforcement:</u> Severity: [05.04a - Severity] Violation: [05.04b - Violation] Enforcement Action(s): [05.04c - Enforcement Action(s)] [05.05 - Unresolved Item Closure]			

The following table shall be used to document findings with associated TE violations documented together in the same report. Findings with associated TE violations are those findings and violation sharing a common performance deficiency or closely related by cause and effect, or both.

Table 4 – Finding with Traditional Enforcement Violation

[05.01a - Title]			
Cornerstone	Significance/Severity	Cross-cutting Aspect	Report Section
[05.01b - Cornerstone]	[05.01c3 - Synopsis]	[05.01d - Cross-Cutting Aspect]	[05.01e - Section]
[05.01f – Introduction and Identification]			

Description:

[05.02a - Description]

Corrective Action(s): [05.02b - Corrective Action(s)]

Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)]

Performance Assessment:

Performance Deficiency: [05.03a - Performance Deficiency]

Screening: [05.03b - Screening]

Significance: [05.03c - Significance]

Cross Cutting Aspect: [05.03d - Cross Cutting Aspect]

Enforcement:

Severity: [05.04a - Severity]

Violation: [05.04b - Violation]

Enforcement Action(s): 05.04c - Enforcement Action(s)]

[05.05 - Unresolved Item Closure]

05.01 Header.

- a. Title. Provide a title that describes the performance deficiency or violation when there is no finding (e.g., "Failure to Remove Plastic Shipping Plug during Rosemount Transmitter Installation", "Failure to Establish Proper Electrical Connections during Main Transformer Maintenance", "Failure to Obtain Prior Approval for a Change Which Decreased the Effectiveness of the Emergency Plan").
- b. Cornerstone. Enter the cornerstone associated with the finding (i.e., Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness, Public Radiation Safety, Occupational Radiation Safety, Security).
- c. Synopsis.
 1. Significance and Tracking.
 - (a) On the first line, enter the significance color of the finding (i.e., Green, Pending Significance Enforcement Review Panel, Preliminary White, Preliminary Yellow, Preliminary Red, or Preliminary Greater than Green).
 - (b) On the second line, enter FIN, NCV (Non-cited Violation), NOV, or AV (Apparent Violation) followed by the [Docket Number(s)]/[Report Number]-[Unique Sequential Integer] as described in IMC 0306, "Reactor Program Systems".

- (c) On the third line, enter the status of the finding. Enter “Closed” for Green FIN, Green NCV, and Green NOV when no licensee response is required. Otherwise designate as “Open.”
- (d) On the fourth line for Preliminary White/Yellow/Red/Greater than Green findings and NOV’s (if applicable), obtain and enter the Enforcement Action Number (EA ##-###).

2. Severity and Tracking.

- (a) On the first line, enter the severity level of the violation or apparent violation (i.e., “Severity Level IV” or “Apparent Violation”).
- (b) On the second line, enter NCV, NOV, or AV followed by the [Docket Number(s)]/[Report Number]-[Unique Sequential Integer] as described in IMC 0306, “Reactor Program Systems.”
- (c) On the third line, enter the status of the violation. Enter “Closed” for Severity Level (SL) IV NCV and SL IV NOV when no licensee response is required. Otherwise designate as “Open”.
- (d) On the fourth line for AVs or NOV’s (if applicable), obtain and enter the Enforcement Action Number (EA ##-###).

3. Significance/Severity and Tracking.

- (a) On the first line, enter the significance of the finding (i.e., Green, Pending Significance Enforcement Review Panel, Preliminary White, Preliminary Yellow, Preliminary Red, or Preliminary Greater than Green).
 - (b) On the second line, enter the severity level of the violation or apparent violation on the second line. Indicate the apparent violation is being assessed using traditional enforcement (i.e., “Severity Level IV” or “Apparent Violation (Traditional Enforcement)”).
 - (c) On the third line, enter NCV, NOV, or AV followed by the [Docket Number(s)]/[Report Number]-[Unique Sequential Integer] as described in IMC 0306, “Reactor Program Systems.”
 - (d) On the fourth line, enter the status of the finding/violation. Enter “Closed” for Green/SL IV NCV and Green/SL IV NOV when no licensee response is required. Otherwise designate as “Open”.
 - (e) On the fifth line, for AVs or NOV’s (if applicable), obtain and enter the Enforcement Action Number (EA ##-###).
- d. Cross Cutting Aspect. Provide the alpha-numeric identifier associated with the selected Cross Cutting Aspect (CCA) listed in IMC 0310 followed by the title of the aspect (e.g., [H.1] – Human Performance, Resources). When no CCA is assigned enter “None.”

- e. Section. List the inspection procedure number and when applicable the title of the sample used to identify the issue (e.g., 71111.01 - Summer Readiness).
- f. Introduction and Identification. Identify the requirement or standard that was not met, the significance, and the assignment of identification (i.e., self-revealed, NRC-identified, or licensee-identified). For violations, indicate whether it is an NOV, AV, or NCV. Examples:

“A self-revealed Green finding was identified when the licensee failed to [identify unmet standard]. Specifically, the licensee failed to [describe how the licensee failed to meet the standard].”

“The inspectors identified a Green finding and associated Non-cited Violation (NCV) of [identify unmet requirement] when the licensee failed to [describe how the licensee failed to meet the requirement].”

“A self-revealed Severity Level IV Non-cited Violation (NCV) of [identify unmet requirement] was identified when the licensee failed to [describe how the licensee failed to meet the requirement].”

“The inspectors identified a Green finding and associated Severity Level IV Non-cited Violation (NCV) of [identify unmet requirement] when the licensee failed to [describe how the licensee failed to meet the requirement].”

05.02 Description and Corrective Actions.

- a. Description. Describe the circumstances associated with the finding or violation or both, and include the factual information that is both necessary and sufficient to support the determinations described in the performance assessment and enforcement sections and to enable an informed, independent reader to understand the actual or potential impact to safety or security. Include the approximate dates the NRC and licensee became aware of the problem. Also include references to any other documented inspection activities or docketed correspondence associated with the finding or violation (e.g., Unresolved Items (URIs), LERs) as appropriate. For findings or violations determined to be NRC-identified because the inspector identified a previously unknown weakness in the licensee’s classification, evaluation, or corrective actions, include evidence that the licensee had identified the issue but failed to properly classify, evaluate, or correct the problem. Most findings can be described in less than one page and should rarely exceed two pages; findings based on more-complex circumstances may merit more discussion.
- b. Corrective Action(s). Describe any licensee corrective action taken. As applicable, describe any immediate corrective actions taken to restore compliance or address any immediate safety or security concerns. As applicable, indicate why continued non-compliance does not present an immediate safety or security concern. As applicable, describe any compensatory measures in place while licensee long-term corrective measures are being implemented.
- c. Corrective Action Reference(s). Provide a reference to any established licensee’s corrective action program document number(s).

05.03 Performance Assessment. The level of detail must allow a knowledgeable reader to reconstruct the decision logic used to arrive at any documented conclusions.

- a. Performance Deficiency. State the performance deficiency. Identify the requirement or standard that was not met and describe how the licensee failed to satisfy the requirement or standard. Refer to Section [13.06](#) when documenting multiple examples of a finding.
- b. Screening. Identify an appropriate More-than-Minor screening question found in IMC 0612 Appendix B that was answered “yes” for the stated performance deficiency. Describe the reason why the identified screening question was answered “yes” (e.g., describe how the cornerstone objective was adversely affected, describe the potential to lead to a more significant safety concern if left uncorrected).
- c. Significance. Describe the logic used to determine the significance of the finding. If the significance has been determined, then characterize the finding as described below. For those findings with pending significance (i.e., the Significance Enforcement Review Panel (SERP) has not determined the significance characterization), state that the finding could not be screened to Green and is pending a significance determination. Characterize the finding as described in items 1(a), 2(a), 4(a), 4(b), and 4(d) below. When the preliminary or final significance determination is complete, document the remaining items below in a subsequent inspection report or cover letter.

1. For all SDP results describe:

- (a) The affected cornerstone as determined by IMC 0609, Attachment 4.
- (b) The SDP Appendix used in the determination, as applicable.
- (c) Any assumptions used in the determination (these assumptions may be referenced and described in the report attachment).
- (d) The resulting color.

2. For risk-informed SDP (e.g., IMC 0609 Appendix A, F, G, H, K) results describe:

- (a) The screening criteria used to assess the finding as Green or the satisfied screening criterion that caused the finding to be assessed in a more detailed risk evaluation or analysis. For a detailed risk evaluation or analysis that results in a Green characterization, include the most dominant core damage sequences, any remaining mitigation capability or recovery credit or both that limited the significance and the exposure time.
- (b) For a detailed risk evaluation or analysis that results in a greater than Green characterization, include the most dominant core damage sequences, any mitigation capability or recovery credit or both that affected the significance and the exposure time.

3. For deterministic SDP (e.g., IMC 0609 Appendix B, C, D, E, I, J, L, M) results describe:
 - (a) The table or flowchart used.
 - (b) The path on the flowchart used to arrive at the conclusion.
4. For all pending or preliminarily significance characterizations discuss the following:
 - (a) For findings with preliminarily significance, include the risk characterization or other basis as determined by the SERP.
 - (b) State that the significance determination is preliminary or pending an initial significance characterization. Emphasize that the safety or security characterization is not yet finalized. Do not make statements regarding safety or security significance in the inspection report when the agency has not yet reached a conclusion.
- d. Cross Cutting Aspect. Include the basis for assigning or not assigning the CCA.
 1. When a CCA is assigned:
 - (a) For licensee-Identified findings with pending or preliminary significance, state that the assigned CCA is dependent on the final significance determination being White, Yellow, or Red.
 - (b) Identify which CCA described in IMC 0310 best corresponds to the apparent cause or most significant causal factor of the performance deficiency.
 - (c) Identify the apparent cause or most-significant contributor of the performance deficiency and explain why it best aligns with the assigned CCA.
 - (d) If assigning a CCA to a finding that occurred outside of the nominal three-year period for “present performance,” explain why the identified apparent cause or most significant causal factor represents present licensee performance.
 2. When a CCA is not assigned, include a statement briefly describing the reason.
Example:

“No cross cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance.”
- e. Traditional Enforcement Assessment. When a TE violation is documented without an associated finding, indicate why.
 1. When no performance deficiency exists, include a statement similar to:

“The NRC determined that this violation was not reasonably foreseeable and preventable by the licensee and therefore is not a performance deficiency.”

2. When a minor performance deficiency exists, include a statement similar to:

“The NRC determined this violation was associated with a minor performance deficiency.”

3. When the TE violation is associated by common performance deficiency with a previously documented finding, reference the tracking number of the finding and include a statement similar to:

“This violation was associated with a previously documented finding assessed using the significance determination process which was document under FIN [Docket Number(s)]/[Report Number]-[Unique Sequential Integer].”

05.04 Enforcement. Violations must be dispositioned in accordance with the Enforcement Policy. Additional enforcement related guidance can be found in the Enforcement Manual.

For 10 CFR 50, Appendix B, Criterion XVI violations involving significant conditions adverse to quality and repetition, refer to the Enforcement Manual for additional documentation requirements.

- a. Severity. When TE is applicable, describe the decision logic used to determine the SL of the violation.

1. Describe why TE is being used to disposition the violation (i.e. willfulness, impacting regulatory process, actual consequence, or a violation without a finding). Include a statement similar to:

“The ROP’s significance determination process does not specifically consider [willfulness or the regulatory process impact] in its assessment of licensee performance. Therefore, it is necessary to address this violation which [involves willfulness or impedes the NRC’s ability to regulate] using traditional enforcement to adequately deter non-compliance.”

2. Describe the logic used to determine the SL of the violation. Include reference to Enforcement Policy examples. For AVs indicate the NRC has not made an enforcement decision.

Note: Inspection reports that contain material that may be related to an ongoing investigation must be reviewed by the Office of Investigations and the Office of Enforcement prior to issuance.

- b. Violation. Document the disposition of violations as follows:

1. What requirement was violated and how it was violated (this requires a “contrary to” statement consistent with guidance in the Enforcement Manual, using language that is parallel to that of the requirement).

2. When the violation occurred and how long it existed (Use bracketing dates or date and duration. Indicate when estimated or ongoing at time of the exit meeting).

Use the following format unless directed otherwise by the Enforcement Manual:

[Requirement violated] requires [Requirement].

Contrary to the above, [When the violation occurred and how long it existed. (e.g., from January 20, 2012 (estimated) to January 30, 2012)] the licensee [what the licensee did contrary to the requirement].

c. Enforcement Action(s). For NCVs, AVs, and NOVs provide a statement similar to:

1. NCVs: "This violation is being treated as a Non-Cited Violation (NCV), consistent with Section 2.3.2 of the Enforcement Policy".
2. AVs: "This violation is being treated as an apparent violation (AV) pending a final significance (enforcement) determination".
3. NOVs: "A Notice of Violation (NOV) is attached." Also, for NOVs, see the Enforcement Manual for guidance on developing the notice and cover letter.

If an NOV is being used to disposition a violation normally dispositioned as an NCV (e.g., Green finding), describe the circumstances in accordance with Section 2.3.2.a of the Enforcement Policy (e.g., "This violation is being cited because the licensee failed to place in corrective action program to restore compliance and address recurrence consistent with Section 2.3.2 of the Enforcement Policy." or "This violation is being cited because the licensee failed to restore compliance within a reasonable period of time after the violation was identified consistent with Section 2.3.2 of the Enforcement Policy."). Record all NOV related corrective action program document number(s) in section [05.02c](#).

05.05 Unresolved Item Closure. If finding results in an URI closure include a reference to URI [Docket Number(s)]/[Report Number]-[Unique Sequential Integer] being close to this finding. (e.g., "This finding closes URI 050000123/2014007-01.")

0611-06 UNRESOLVED ITEMS

Use the following table to document URIs being opened. Do not document URIs in the summary section or in the inspection report cover letter.

Table 5 – Open Unresolved Item

Unresolved Item (Open)	[06.01a –Title and Tracking]	[05.01e – Section]
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Description: [06.01b - Description]

Planned Closure Action(s): [06.01c - Planned Closure Action(s)]

Licensee Action(s): [06.01d - Licensee Action(s)]

Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)]

Use the following table to document URI closures which do not result in a finding or violation being documented using Section [0611-05](#). Document the URI closure in the results section of the report under the inspectable area associated with the sample or inspection activity that resulted in the opening of the URI. Otherwise, document the closure in the appropriate "OTHER ACTIVITIES" section of the report.

Table 6 – Closed Unresolved Item – No Finding or Violation Documented using Section 0611-05

Unresolved Item (Closed)	[06.01a –Title and Tracking]	[05.01e – Section]
<u>Description:</u> [06.01b - Description]		
Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)]		

06.01 Unresolved Item.

- a. Title and Tracking. Provide a title for the URI. The title should describe the issue of concern (e.g., "Cable Insulation Resistance during Flooding") on line one. On line two enter URI followed by the [Docket Number(s)]/[Report Number]-[Unique Sequential Integer] as described in IMC 0306.
- b. Description. Describe the URI using Section [05.02](#) of this IMC as a guide.
 1. When opening a URI, clearly state that an URI was identified and describe the issue with sufficient detail, so that another inspector could complete the inspection and documentation effort.
 2. When closing a URI, the level of detail devoted to closing URIs depends on the nature and significance of the additional information identified. Documentation of the closure of a URI must include a summary of the topic, the inspector's follow-up actions, and evaluation of the adequacy of any licensee actions. If resolution to a URI was based on discussions between inspector(s) and Nuclear Reactor Regulation (NRR) technical staff, concisely document the details of these discussions. Additionally, branch chiefs of the inspector(s) and technical staff who were involved in these discussions should concur on the inspection report. The discussion should include why the issue is not a finding or more than minor violation (e.g., not reasonably within the licensee ability to foresee and correct, minor performance deficiency, not a violation or licensee standard).
- c. Planned Closure Action(s). Clearly identify the specific licensee or NRC actions needed to resolve the issue.

- d. Licensee Action(s). Describe any corrective actions taken to eliminate any perceived immediate safety or security concerns.

0611-07 DISCUSSED OPEN ITEMS

Use the following table to document open items being discussed.

Table 7 – Discussed Item

[07.02a - Item Type] (Discussed)	[07.02b -Title and Tracking]	[05.01e – Section]
<u>Discussion</u> : [07.02c - Discussion]		

07.01 Discussed Open Items. Open Items such as unresolved items, apparent violations, preliminary and pending findings, and notices of violation requiring a response were assigned an open tracking status in a previously issued inspection report. Document discussed open items in the results section of the report under the inspectable area associated with the sample or inspection activity that resulted in the opening of the item.

- Item Type. Describe the item type (e.g., “Unresolved Item”)
- Title and Tracking. Enter the previously used title and tracking number assigned when the item was opened in a prior report on lines one and two.
- Discussion. Capture follow up actions, pertinent facts gathered, and observations which may support a disposition of the potential violation or finding assessment.

0611-08 LICENSEE-IDENTIFIED NON-CITED VIOLATIONS

Licensee-identified violations which meet the requirements for an NCV in accordance with Section 2.3.2.a of the Enforcement Policy should receive minimal documentation. These licensee-identified NCVs are not considered during the assessment process to prevent discouraging aggressive problem identification processes.

All other non-minor violations must be documented in accordance with Section [0611-05](#) or [0611-11](#).

Document licensee identified violations in the results section of the report under the inspectable area associated with the sample or inspection activity. Use the following table to document licensee identified violations.

Table 8 – Licensee Identified Violation

Licensee Identified Non-Cited Violation	[05.01e – Section]
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This violation of very low safety significant was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a Non-Cited Violation, consistent with Section 2.3.2 of the Enforcement Policy.
Violation: [05.04a - Violation]
Significance/Severity: [08.01 - Significance/Severity]
Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)]

08.01 Significance/Severity.

- a. For violations of very low safety or security significance (Green), briefly explain why the finding is Green.
- b. For SL IV violations, identify why TE is applicable and briefly describe the SL categorization in accordance with the Enforcement Policy.

0611-09 CLOSURE OF LICENSEE EVENT REPORTS (LERs)

LERs are submitted by licensees and are reviewed and inspected using IP 71153, "Follow-up of Events and Notices of Enforcement Discretion." Document reviewed LERs in the scope section of the report under Section 71153. Document the review by identifying the LER reviewed and providing a general reference to the submitted document as illustrated below.

The inspectors evaluated the following licensee event reports which can be accessed at <https://lersearch.inl.gov/LERSearchCriteria.aspx>:

(1) Licensee Event Report [Unique Identifier e.g., 05000325/2014-005-00], [Title], on [date]

If an LER review is already documented in a separate NRC correspondence then provide reference to the correspondence and a brief statement similar to:

The NRC reviewed Licensee Event Report (LER) [Unique Identifier e.g., 05000325/2014-005-00] (<https://lersearch.inl.gov/LERSearchCriteria.aspx>), [Title]. This review is documented in [provide reference].

Any findings and violations identified during the LER review, including violations which are minor, must be dispositioned in the report.

0611-10 CLOSURE OF CITED VIOLATIONS

After receipt of the licensee's response to an NOV and the satisfactory completion of any required supplemental inspections, document the closure of the cited violation. Generally, this will be captured in the Supplemental Inspection Report and its cover letter along with the corresponding Action Matrix response and assessment letter. However, Green or SL IV NOVs may need to be documented in the inspection report as being closed when the NRC has verified a satisfactory docketed licensee response. In such cases include a sentence similar to the

following in the scope section of the report associated with the sample or inspection activity used to inspect the NOV's closure:

"The inspectors reviewed the licensee's response to NOV [Docket Number(s)]/[Report Number]-[Unique Sequential Integer] and determined that the reason, corrective actions taken and planned to address recurrence, and the date when full compliance will be/was achieved for this violation is adequately addressed and captured on the docket."

0611-11 VIOLATIONS WARRANTING ENFORCEMENT DISCRETION

Bring violations that may warrant enforcement discretion (e.g., violations without performance deficiencies) to the attention of the Regional Enforcement Coordinator. Default to any overriding directions found in an Interim Enforcement Policy, an Enforcement Guidance Memorandum, or the Enforcement Manual. Unless otherwise directed, document violations receiving enforcement discretion in the results section of the report under the applicable inspectable area. Use the following table to document violations receiving enforcement discretion.

Table 9 – Enforcement Discretion

Enforcement Discretion	[11.01 - Enforcement Action]	[05.01e – Section]
<u>Description:</u> [05.02a - Description] Corrective Action(s): [05.02b - Corrective Action(s)] Corrective Action Reference(s): [05.02c - Corrective Action Reference(s)] Violation: [05.04b - Violation] Severity/Significance: [05.04a - Severity] Discretion Basis: [11.02 - Discretion] [05.05 - Unresolved Item Closure]		

11.01 Enforcement Action. Identify the Enforcement Action Number and provide a title with a reference to any applicable Enforcement Guidance Memorandum (EGM). Example:

"Enforcement Action 17-003: Emergency Diesel Generator Exhaust Stack - Tornado Missile Protection (EGM 15-002)"

11.02 Discretion. State why enforcement discretion is being granted. Include an appropriate statement such as:

"The NRC exercised enforcement discretion in accordance with Section [#.#] of the Enforcement Policy because [reason]."

Note: Violations that receive enforcement discretion are not assigned an ROP tracking number and are not documented in the Summary. They must be assigned an enforcement action (EA) number which can be obtained through the Regional Enforcement Coordinator. The cover letter must contain the required language used for exercising enforcement discretion.

0611-12 MINOR PERFORMANCE DEFICIENCIES, MINOR VIOLATIONS, AND OBSERVATIONS

Minor performance deficiencies, minor violations, and observations are not routinely documented in inspection reports. However, they may be documented when specifically allowed by an inspection procedure or temporary instruction, or when it becomes necessary to capture a required inspection activity or conclusion for the record such as closing out an LER, or URI. When a minor performance deficiency or violation is documented, provide sufficient detail to allow an informed, independent reader to understand the basis for the minor determination. Document minor performance deficiencies or violations in the results section of the report under the applicable inspectable area when necessary.

Use the following table to document minor performance deficiencies.

Table 10 – Minor Performance Deficiency

Minor Performance Deficiency	[05.01e – Section]
Minor Performance Deficiency: [12.01a – Minor Issue]	
Screening: [12.01b - Screening]	

Use the following table to document minor violations.

Table 11 – Minor Violation

Minor Violation	[05.01e – Section]
Minor Violation: [12.01a – Minor Issue]	
Screening: [12.01b - Screening]	
Enforcement: [12.01c]	

12.01 Minor Performance Deficiency / Minor Violation

- a. Minor Issue. Briefly describe the minor performance deficiency or minor violation.
- b. Screening. State the reason why the performance deficiency or TE violation is minor in accordance with IMC 0612 Appendix B More-than-Minor screening questions or the Enforcement Policy as applicable.

- c. Enforcement. For violations, state the licensee has taken actions to restore compliance and include a statement similar to the following: “This failure to comply with [requirement] constitutes a minor violation that is not subject to enforcement action in accordance with the NRC’s Enforcement Policy.”

When specifically allowed by the IP, document observations in the results section of the report under the applicable inspectable area. Use the following table to document observations.

Table 12 – Observation

Observation	[05.01e – Section]

0611-13 OTHER REQUIREMENTS

13.01 Treatment of Third Party Reviews. When reviewing Institute of Nuclear Power Operations (INPO) or other third party evaluations, accreditation reports in accordance with Executive Director of Operations Policy 220, include in “THIRD PARTY REVIEWS” section of the report, a brief statement that the review was completed. Do not include a recounting or listing of INPO conclusions or reference a final INPO rating; discuss the specifics of any significant differences between NRC and INPO perceptions with regional management. Further, INPO related conclusions, recommendations, or corrective actions are not referenced in NRC inspection reports. If an INPO or other third party issue is of such safety significance that it warrants tracking, it should be independently evaluated, inspected, documented, and then tracked as an NRC finding or URI.

INPO conclusions, recommendations, corrective actions, and operating experience which are placed in the licensee’s corrective action program, are considered appropriate for inspection. When documenting review of these issues, inspection reports should not reference INPO reports or documents, INPO designations, or specific sites affected by operating experience. Referencing the licensee’s corrective action program and providing a brief description (e.g., “Condition Report 235235 concerning industry information on pumps.”) will generally suffice.

13.02 Non-Routine Inspections. Results from IMC 2515 Appendix C inspections, temporary instructions, or other non-routine inspection activities not addressed in this IMC are documented in the appropriate “OTHER ACTIVITIES” section of the report. In some cases, factual observations may be documented. If it is necessary to document a minor issue or minor violation, follow the direction in Section [0611-12](#), “Minor Issues and Minor Violations.” Temporary Instructions or other non-routine procedures may provide more specific documentation instructions which take precedence over IMC 0611. If clarification is needed on proper integration into the report, contact the program office.

13.03 Treatment of Sensitive Unclassified Non-Safeguards Information (SUNSI) in Non-Security Related Reports. SUNSI must not be made publicly available and must be segregated from other portions of the report which are to be made publicly available. This can typically be accomplished by creating and referencing a separate report enclosure which can be profiled in Agencywide Documents Access and Management System (ADAMS) as “Non-Publicly Available.” The documents containing SUNSI must be marked in accordance with Management

Directive 12.6, "NRC Sensitive Unclassified Information Security Program." Security inspection reports should not be used to document inspection activities or findings that fall outside of the security cornerstone. The NRC policy for handling, marking, and protecting SUNSI is publicly available on the NRC Public Web site at <http://www.nrc.gov/reading-rm/doc-collections/commission/comm-secy/2005/2005-0054comscy-attachment2.pdf>. Additional staff direction for handling of SUNSI is published on the NRC internal Web site at <http://www.internal.nrc.gov/sunsi/>.

13.04 Amending Inspection Reports. If it becomes necessary to correct an issued report for the record, revise the previously issued report and reissue it in its entirety under the same inspection report number. The revised report must receive a new and unique ADAMS accession number and must be added into an ADAMS package which contains the original report. The cover letter accompanying the reissued report must reference the inspection report it replaces with its associated ADAMS accession number, explain why the report is being reissued, briefly describe the changes, and indicate which section of the report was revised. The cover letter does not need to reiterate information previously communicated. Changes which affect the Action Matrix or Cross-cutting Issues must be coordinated with the ROP Assessment Branch (IRAB). After the report is revised, the responsible branch should update the Reactor Program Systems (RPS) database as appropriate and contact the IRAB lead for IMC 0305, "Operating Reactor Assessment Program" to initiate any required public web page updates in accordance with IMC 0306, "Information Technology Support for the Reactor Oversight Process." Note that a revised inspection report must not be used to document new inspection findings or inspection activities which occurred after the initial report was issued.

13.05 Plain Language. Use plain language in reports. For additional direction refer to NUREG-1379, "NRC Editorial Style Guide."

13.06 Documenting Multiple Examples of a Finding. Multiple examples of the same performance deficiency that share the same cause and require the same corrective actions shall be documented as a single finding. Note that each example must be able to stand alone as a finding. Do not use the number of finding examples to aggregate the significance; base the significance off the most significant example. Provide an accounting of the examples after stating the performance deficiency.

13.07 Graphics/Visual Aids. Use of graphics (drawings, diagrams, photographs, or photocopies) if their inclusion will simplify describing a complex condition that would otherwise require substantially more text.

Photographs of plant areas or equipment or photocopies of technical or vendor manual pages must be handled in accordance with IMC 0620, "Inspection Documents and Records." When including graphics, the following should be considered:

- a. Format as a jpeg and adjust size (height, width, and resolution) so as not to significantly increase overall file size.
- b. Locate on less than ½ page, or put in an attachment.
- c. Center on page and left/right indented from the text.
- d. Include a unique identifier (Figure/Diagram/Photograph X) with a descriptive title (e.g., Breaker Trip Latch Alignment).

0611-14 COMPILING AN INSPECTION REPORT

Compile and arrange the inspection report using Exhibit 1, “Standard Reactor Inspection Report Outline” as a guide. The Enforcement Manual for enforcement related matters and IMC 0305, “Operating Reactor Assessment Program” for assessment related matters may also provide additional directions.

14.01 Cover Letter. Write a cover letter to communicate the overall inspection results and the inspection findings to the licensee. Inspection reports are sent from the applicable NRC official (Branch Chief, Division Director, or Regional Administrator) to the designated licensee executive. Refer to Exhibit 4, “ROP Inspection Report Cover Letter Templates” for additional requirements. Cover letter formats for communicating enforcement actions vary and are found in the Enforcement Manual, Appendix B. An enforcement action number shall be obtained from the Office of Enforcement and included on the cover letter when either required by the Enforcement Manual or when a finding having preliminary significance is documented in the inspection report.

14.02 Cover Page. The report cover page gives a succinct summary of information about the inspection. It contains: the docket number(s), license number(s), report number, enterprise project identifier, licensee name, facility name, facility location (city and state), dates of the inspection, names and titles of participating inspectors (and may include names of those inspectors who have achieved basic inspector certification but are not yet fully qualified), and name and title of the approving NRC manager who sign out the inspection report. The inspection report number is to be identified in the following form as required by IMC 0306, “Information Technology Support for the Reactor Oversight Process:”

Docket No. / Year [sequential number of the report in that year] (e.g.,
05000410/2003001)

14.03 Summary.

- a. Summary Paragraph. Include a paragraph similar to the following and modify it to accurately describe the content of the report regarding findings, violations, and licensee identified violations.

“The NRC continued monitoring licensee’s performance by conducting a [type of inspection] at [Site] [Units] in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC’s program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information. NRC and self-revealed findings, violations, and additional items are summarized in the table below. Licensee-identified non-cited violations are documented in report sections: [report section], [report section].”

- b. List of Findings and Violations. Copy the finding and violation header summary from the write-ups done for Section [0611-05](#). Organize the finding and violation header summaries by the order they appear in the report. When an IP has multiple findings, further organize by the significance/importance within the IP Results Section. If no findings or violations were identified, include a statement similar to “No findings were

identified” or “No findings and more than minor violations were identified” as appropriate after the summary paragraph.

- c. Additional Tracking Items. Include a list of items opened, closed, and discussed which are not directly covered in the list of findings and violations above. For each listed item, include the item type, tracking number, title, status (i.e., Open, Closed, and Discussed), and a reference to the appropriate report section.

14.04 Table of Contents. Develop a table of contents when the report is considered complicated or of lengthy.

14.05 Plant Status. Include a Summary of Plant Status section, if appropriate. Briefly describe pertinent operational events and plant status, such as significant planned and unplanned transients or power changes in excess of performance indicator thresholds, unplanned system actuations, or degraded conditions which significantly affected operations. This summary is not needed for some inspections since plant operating status may not be relevant.

14.06 Inspection Scopes.

- a. Scope Paragraph. Include a paragraph similar to the following once at the beginning of the scope section.

“Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, “Light-Water Reactor Inspection Program - Operations Phase.” [Include for integrated report: The inspectors performed plant status activities described in IMC 2515 Appendix D, “Plant Status” and conducted routine reviews using IP 71152, “Problem Identification and Resolution.”] The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.”

- b. Inspection Scope. Following the scope paragraph, for inspection activities performed identify the report section by the IP number and name, sample type, the number of samples performed, followed by the inspection scope. For a typical inspection scope, use a sentence to describe the sample or inspection activity followed by a listing of samples or items reviewed as appropriate. Arrange using the standard report outline shown in Exhibit 1.

Identify what was inspected for each listed item reviewed or sample completed. Be specific, so that future inspections can be informed. Include the following information for each listed item or sample as appropriate:

1. The equipment/space walked-down, document reviewed, or evolution observed to fulfill the sample requirement or complete the inspection activity

2. Methods of inspection (e.g., a walk-down, in-office review, observation): If the method differs from the methods discussed in the inspection procedure or the method was selected from a range of acceptable methods presented in the IP.
3. Dates of inspection: If dates provide important context. For example: surveillance test performance, post maintenance test, or fire protection walk-downs typically would have dates, while a maintenance rule or annual problem identification and resolution samples may not need dates.
4. Location of inspection: If a substantive portion of the inspection activity was conducted at a location other than the site (e.g., an off-site vendor review)

A baseline inspection scope which meets all inspection procedure sample requirements is shown below:

"71111.15 - Operability Determinations and Functionality Assessments (2 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

- (1) Emergency Diesel Generator Ventilation Fans on September 11, 2013
- (2) Safety Injection Refueling Water Tank (SIRWT) Anchor Ring Cracking on November 11, 2013"

An example of an incomplete or partial baseline sample is shown below:

"71111.20 - Refueling and Other Outage Activities (Partial Sample)

The inspectors evaluated refueling outage ## activities from March 20, 2018 to March 31, 2018. The inspectors completed inspection procedure Sections ### and ####."

When documenting a sample completed by performing a subset of all procedure requirements (i.e. those most appropriate to the inspection activity being performed, per IMC 2515 Section 08.04), annotate in the scope which portions of the procedure were actually performed, similar to the example shown above for a partial sample.

14.07 Inspection Results. Organize the inspection results (e.g. tabled information documented using Sections 0611-05 through 0611-11) in accordance with IMC 0611 Exhibit 1 grouped by IP. Only include tables for IP's which have inspection results. Omit the results section when no inspection results exist in the entire report.

14.08 Exit Meetings and Debriefs. Write a brief summary for each exit meeting or formal debrief related to report inspections in "EXIT MEETINGS AND DEBRIEFS" section of the report. The summary must identify the most senior licensee manager who attended the exit meeting and should include the following information:

- a. Proprietary Information. Confirm with the licensee at the exit meeting that the NRC has (or has not) returned any proprietary materials used during the inspection (Refer to IMC 2515, Section 12.01 and IMC 0620 for further direction).

If proprietary information was not retained, use a statement similar to:

“The inspectors verified no proprietary information was retained or documented in this report.”

If proprietary information was retained, use a statement similar to:

“The inspectors confirmed that proprietary information was controlled to protect from public disclosure.”

Note: When an inspection is likely to involve proprietary information (i.e., given the technical area or other considerations of inspection scope), handling of proprietary information should be discussed at the entrance meeting.

- b. Subsequent Contacts or Changes in NRC Position. If the NRC's position on an inspection finding changes after the exit meeting, conduct an additional exit meeting to discuss that change with the licensee.
- c. Licensee's Exit Meeting Response. Do not attempt to characterize or interpret any oral statements the licensee makes, at the exit meeting or at any other time during the inspection, as a commitment. If the licensee disagrees with an inspection finding, this position may be characterized by the licensee in its formal response to the inspection report.

14.09 Third Party Reviews. Document the completion of third part reviews in this section. For example state “The inspectors reviewed Institute on Nuclear Power Reactor reports that were issued during the inspection period.”

14.10 Documents Reviewed. List critically review documents in support future inspection activities (e.g., inform future design bases assurance inspection sample selections) and that support NRC determinations (e.g., findings, significance). Documents recorded in the official agency record or report must have appropriate informational value to warrant preservation. Documents critically reviewed during the completion of the inspection, generally do not need to be listed unless they are needed to support effective regulatory oversight. Do not duplicate documents described in the finding and violation write-ups in the documents reviewed section of the report.

Include sufficient detail about the listed documents to allow the NRC to retrieve the document from the licensee in the foreseeable future. A unique identifier, which may include the tracking number, title, revision and/or date, must be provided for each document referenced.

Note: Inspection reports should not reference specific INPO reports or documents. If it is absolutely necessary to document review of a specific INPO document (e.g., an evaluation referring to the INPO document was an inspection sample or justification for a finding) after considering Section [13.01](#) of this IMC, then state the reference number of the item reviewed and provide general words for the title (e.g., “November 2011 INPO plant assessment of Your Plant” dated January 17, 2012).

14.11 Report Attachments. If desired, attachments (e.g., significance determination supporting details) may be referenced and added to the end of the inspection report. The

attachments may be combined into a single attachment entitled "Supplemental Information" if desired.

14.12 Cover Letter Enclosures. The inspection report starting with the cover page report is typically cover letter Enclosure 1. Additional cover letter enclosure maybe necessary to communicate an NOV.

0611-15 ISSUING INSPECTION REPORTS

15.01 Report Timeliness. Most inspection reports, including special inspections, should be issued no later than 45 calendar days after inspection completion. Augmented Inspection Team reports must be issued no later than 30 calendar days after inspection completion.

Note: Inspection completion is defined as the last day of the inspection quarter for integrated inspection reports (e.g., resident inspector quarterly report) and the day of the exit meeting for all other inspection reports (e.g., team inspections).

15.02 Release and Disclosure of Inspection Reports.

- a. General Public Disclosure and Exemptions. Except for report enclosures containing exempt information (Refer to IMC 0620), all non-security cornerstone inspection reports will be routinely disclosed to the public.
- b. Security Cornerstone Inspection Reports. Security cornerstone inspection reports will not be made available to the public. However, security cornerstone inspection reports cover letters will be made available to the public. Security-related inspection reports will be sent to the respective State Liaison Officers and State Homeland Security Advisors, when they have been appointed, authorized, communicated a desire to receive the report, and have the resources to control the safeguards information (SGI). These reports will be controlled and marked as SGI or Official Use Only – Security–Related Information (OUO – SRI) based on the level of information contained in them.

The cover letters will be marked for the highest level of controlled information contained in the inspection report: official use only (SUNSI) or SGI. The marking requirements for SGI are in Management Directive 12.6, "NRC Sensitive Unclassified Information Security Program," and the requirements for marking OUO -SRI documents are on the Web at: <http://www.internal.nrc.gov/sunsi/>, "Sensitive Unclassified Non-Safeguards Information (SUNSI)."

- c. Release of Investigation-Related Information. When an inspector accompanies an investigator on an investigation, the inspector shall not release either the investigation report or their individual input to the investigation report to the public. This information is exempt from disclosure by 10 CFR 9.17, "Agency Records Exempt from Public Disclosure," and must not be circulated outside the NRC without specific approval of the Chairman (Refer to OI Policy Statement 23).

The latest revisions of the following exhibits and appendices may be accessed from the NRC Public Inspection Manual Chapters Web Page, located at:
<http://www.nrc.gov/reading-rm/doc-collections/insp-manual/manual-chapter/index.html>.

The latest revisions of NRC Public Inspection Procedures are also available at the NRC Public Inspection Procedures Web Page, located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/>.

EXHIBITS

- Exhibit 1: Standard Reactor Inspection Report Outline
- Exhibit 2: Inspection Report Documentation Matrix
- Exhibit 4: ROP Inspection Report Cover Letter Templates

APPENDICES

- Appendix A: Acronyms Used in Inspection Reports
- Appendix C: Guidance for Supplemental Inspection Reports
- Appendix D: Guidance for Problem Identification and Resolution Inspection Reports

END

Attachment 1 – Revision History for IMC 0611

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML17122A252 05/03/17 CN 17-009	Initial issue of IMC 0611. This IMC has been created to separate power reactor inspection reports from issue screening, and is consistent with the inspection report documentation guidance that was formerly in IMC 0612.		n/a
	ML17150A030 12/13/17 CN 17-029	Revised to reflect new streamlined report format. This is a complete rewrite. Completed non-concurrence package can be found in ML17345A041.		ML17164A299 0612-2269 ML17348A017 See non-concurrence package ML17345A041