

NRC INSPECTION MANUAL

IRIB

INSPECTION MANUAL CHAPTER 0040

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

Effective Date: 01/05/2018

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0040-01 PURPOSE

01.01 Outlines the process for preparing, issuing, and revising all Nuclear Regulatory Commission (NRC) Inspection Manual documents issued by the various NRC Offices that manage and oversee inspection programs: Office of Nuclear Material Safety and Safeguards (NMSS), Office of New Reactors (NRO), Office of Nuclear Reactor Regulation (NRR), and Office of Nuclear Security and Incident Response (NSIR).

01.02 Specifies responsibilities and authorities for preparing, issuing, and revising inspection manual documents, including the requirement for periodic review of inspection manual documents.

01.03 Establishes the basic requirements and governing format for inspection manual documents, including inspection manual chapters, inspection procedures, temporary instructions, and Operating Experience Smart Samples.

0040-02 OBJECTIVES

02.01 To help inspection program management and staff plan and develop clear, accurate, and effective inspection manual documents.

02.02 To ensure consistency, and meet Agency standards, in the format and content of inspection manual documents.

02.03 To ensure consistency when issuing memoranda transmitting draft inspection manual documents for comment.

0040-03 DEFINITIONS

03.01 General.

- a. Originating Organization. The NRC program office, division, and/or branch responsible for the policy and technical content of an inspection manual document, including its creation, revision, or deletion.
- b. Reactor Oversight Process (ROP). NRC's regulatory framework for operating reactors that includes licensee performance indicator (PI) data, NRC inspection activity and determination of inspection finding significance, and licensee performance assessment.
- c. Construction Reactor Oversight Process (cROP). NRC's regulatory framework for reactors under construction that includes NRC construction inspection assessment and enforcement programs.
- d. Non-Reactor Oversight Process. NRC's regulatory framework for nuclear materials, reactor waste and Research and Test reactors that includes assessment and enforcement programs.

03.02 Types of Inspection Manual Documents. A standalone table of contents, inspection manual chapter, inspection procedure, temporary instruction, operating experience smart sample, technical guidance, 10 CFR guidance, feedback form, comment resolution summary, and change notice are all considered types of inspection manual documents. (See Exhibits 4, 5, and 6 for formatting instructions and standards.)

- a. Table of Contents (TOC). A standalone document which is an outline of the inspection manual's structure and a numerical listing of the inspection manual documents. Certain document numbers and titles are reserved for future development.
- b. Inspection Manual Chapter (IMC). A document containing written administrative or inspection program statements of policy. IMCs state the purpose, objectives, definitions, responsibilities, authorities, and basic requirements for inspection programs. An IMC for an inspection program defines the program through a listing of inspection procedures, which is normally appended to the IMC.
- c. Inspection Procedure (IP). A document containing objectives, requirements, and specific guidance for inspection activities, which are focused on safety, security, or safeguards.

IPs describe the activities performed by an inspector or technical staff, including administrative requirements. IPs also identify the applicable program, state the objective of the inspection, list the inspection requirements, give inspection guidance, and estimate the resources needed.

- d. Baseline Inspection Procedures. A document containing objectives, requirements, and specific guidance for operating reactor baseline inspection activities, which are focused on safety, security, or safeguards, and include specific sample requirements. Baseline inspection procedures define the minimum level of inspections that all plants will receive regardless of performance.
- e. Temporary Instruction (TI). A temporary inspection procedure that is focused on current safety issues or concerns not currently addressed by established IPs or IMCs.
- f. Operating Experience Smart Sample (OpESS). A document used to integrate operating experience (OpE) into the ROP inspection process. The OpESS makes relevant OpE more accessible to inspectors in the form of a detailed synopsis of selected issues determined to have potential generic safety implications. OpESS's inform and enhance ROP inspection samples within existing ROP inspection procedure requirements and level of effort. Additional information is provided in IMC 2523, "NRC Application of Operating Experience."
- g. Technical Guidance (TG). An inspection manual document issued to provide specific guidance to address a particular technical question that is associated with an inspection procedure. These guidance documents are found in Part 9900 of the Inspection Manual. No new technical guidance documents will be issued or revised.

- h. 10 CFR Guidance. A guidance document on acceptable approaches to particular issues involving rules and regulations in 10 CFR. These guidance documents are found in Part 9900 of the Inspection Manual. No new 10 CFR guidance documents will be issued or revised.

Every Technical Guidance, or 10 CFR Guidance, document will be reviewed. Based on the type of document and current use, it will be relocated from the inspection manual to another document collection; redefined as another inspection manual document, such as an IMC or IP; or deleted entirely.

- i. Feedback Forms (FBF). See IMC 0801, "Inspection Program Feedback Form Process," for definitions and use.
- j. Comment Resolution Summary. A summary of comments received and their resolution.
- k. Change Notice (CN). A sequentially numbered and dated transmittal document that lists new, revised, and/or deleted inspection manual documents; distributes new and revised inspection manual documents; and includes a "Remarks" section that summarizes the reasons for issuing, revising, or deleting a document. Any required special training identified in an IP or TI is also stated.
- l. Document Issuing Form (DIF). A form required to initiate creation, revision, or deletion of an inspection manual document. A signed DIF is required for every inspection manual document creation, revision, or deletion.

03.03 Support Information for Inspection Manual Documents.

See Subsection 05.02 and Exhibit 9 for formatting instructions and standards.

- a. Table of Contents. The introductory outline of the entire Inspection Manual's structure and listing of the Inspection Manual's active program documents. The inspection program has its own standalone table of contents, but some inspection manual chapters include a table of contents within the inspection manual chapter itself.
- b. Appendix. A supplement that contains instructional material, either mandatory or discretionary, that is relevant to a document but is too detailed or extensive to be included directly in the body of the document. An appendix can either be included in the back of the inspection manual chapter or procedure itself, or it can be its own standalone document.
- c. Attachment. Material that is relevant to a document but is too detailed or extensive to be practically included directly in the body of the document. Attachments can be either placed in the back of the inspection manual chapter or inspection procedure, or can be considered as standalone documents. Attachments are generally in the form of a numbered table, exhibit, or figure, etc.

- d. Exhibit. An example or feature of document requirements which may include accompanying instructions.
- e. Figure. Graphical material. Generally found within an IMC, IP or TI. Should be labeled chronologically.
- f. Table. Information presented compactly in columns and rows.

0040-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Program Office.

Each office with an inspection program (NMSS, NRO, NRR and NSIR) will appoint its own Inspection Manual Coordinator.

04.02 Originating Organization. Following are responsibilities of the originating organization:

- a. Ensures inspection guidance and governing documents remain relevant to the inspection program
- b. Develops and revises inspection manual documents necessary to carry out assigned organizational programmatic responsibilities that comply with NRC policies.
- c. Performs tasks consistent with internal office guidance, such as preparing memoranda to obtain comments on proposed new and revised inspection manual documents from other organizations and stakeholders, and ensures that all inspection manual documents conform to the appropriate guidance and basis documents for each program office.

In addition: Offices other than NRR may have separate Office Instructions which supplements the process described herein for maintaining the inspection manual documents. Each Office Inspection Manual Coordinator (IM Coordinator) can address their specific inspection program requirements.

- d. Elicits appropriate stakeholder feedback from the regions and the NRC offices affected by drafts of new or substantially revised inspection manual documents. The comments received are then dispositioned in a comment resolution summary, which is included in the Document Issuing Package as non-public. (See Subsections 06.04 and 06.05). Accepted comments are incorporated in the revised document.
- e. Identifies training needs associated with performing new or revised procedures required in an IP or a TI, as described in Subsection 06.01 of this IMC.

- f. Obtains the necessary approval for any increase in the Full Time Equivalent (FTE) inspection effort specified in a program document. (Which would also include coordination in the initial stages of a TI. See Subsection 07.04.)
- g. Informs NRC technical staff of a pending procedure change and ensures that required training is provided before the procedure is issued or before the procedure becomes effective.
- h. Prepares and routes final drafts of newly created or modified inspection manual documents to the originating organization's IM Coordinator when ready for issuance, in accordance with applicable internal office guidance.
- i. Ensures that a TI is managed by: providing guidance for follow-up and closure of the TI, including specific regional responsibilities; clearly distinguishing mandatory requirements; reviewing and analyzing TI results; giving feedback to the appropriate managers, as necessary; determining whether an additional inspection is needed as follow-up to the TI; and submitting the DIF (Exhibit 2) to the IM Coordinator of the originating office when initiating, revising, or deleting the TI.
- j. Conducts a periodic review of each of its inspection manual documents to determine whether a document should be revised or deleted. The originating office is responsible for maintaining and updating inspection documents based on its inspection program requirements.

This periodic review is not intended to be an in-depth programmatic review, but is intended to be detailed enough to provide sufficient justification for revising or deleting documents from the inspection manual, or for transferring ownership of documents to another division or office. In order to determine which inspection manual documents will be revised, deleted or transferred, the following information is considered by the originating organization in the review:

- 1. time elapsed since documents were last revised
- 2. time elapsed since documents were last charged to, or used by an inspector
- 3. amount of time charged to documents in the last 10-15 years
- 4. type of facilities that documents are used to inspect
- 5. documents that have been superseded by other documents or programs (i.e. the ROP, Regulatory Guidance, etc.)
- 6. documents associated with obsolete subject matter
- 7. the current referenced material and hyperlinks are active
- 8. all hyperlinks point to publicly available documents and webpages, or are identified as non-public
- 9. the point of contact (POC) is correct,
- 10. the program applicability is current
- 11. in each inspection program, the requirements are clearly indicated
- 12. the appropriate use of "may" and "must," and "should" and "shall" to incorporate editorial and formatting issues not addressed previously
- 13. the use of "Plain Language" is incorporated as much as possible.

Once the above information is considered, and it is determined that an extensive revision is not necessary, the document will be issued with a new issue date in the footer, and the "Description of Change," column in the Revision History Table will state that a periodic review has been completed. Revisions that are not editorial in nature will be processed consistent with IMC 0040 to include issuance for inspection manual review and comment, which will include a description of the changes made in the Description of Change column in the Revision History Table.

If the review determines that the document is no longer needed for the inspection program, and can be deleted, the Document Lead should engage with relevant stakeholders to ensure a deletion is the correct path to take and then complete a DIF documenting the reason for the deletion. A comment resolution summary may be beneficial to document the reasons for deletion.

- k. Informs the NRC staff in the affected division about evaluation, revision, or deletion of a inspection manual document.
- l. In cases where the inspection manual document impacts another office of the NRC, through shared use of resources or scheduling; communicates the parameters and scope of the proposed inspection manual document early in the process; includes the other office in the comment seeking and resolution process; and adds an additional signature line on the DIF for the other office's management (branch chief or higher).

04.03 Director, Division of Inspection and Regional Support, NRR/DIRS .

- a. Coordinates inspection policies, programs, and guidance for nuclear reactors.
- b. Reviews and approves the content of new NMSS, NRO and NSIR documents, as well as those NRR documents with major revisions, as they relate to the ROP inspection program.

04.04 cROP/ROP Inspection Programs Division or Deputy Division Director: NRO/DCIP, NRR/DIRS, NSIR/DPR, and NSIR/DSO.

- a. Reviews regional best practices and initiatives for possible incorporation into the construction reactor inspection program/reactor inspection program.
- b. Ensures that all new, as well as major revisions to, inspection manual documents conform to applicable program basis documentation. (A major revision is defined as an extensive change to the document that conforms to overall programmatic changes.)
- c. Reviews and approves the content of new, as well as the major revisions of, inspection manual documents (which could include, but is not limited to, policy changes) necessary to carry out assigned program functions. (Division Directors or Deputy Division Directors from NRO and NSIR must sign each DIF before sending the document to NRR for distribution, unless otherwise noted.)

- d. Confirms that a new inspection manual document, as well as a major revision, meets the requirements of this IMC prior to signing the DIF (Exhibit 3).
- 04.05 Chief, Inspection and Regulatory Improvements Branch, NSIR/DPR/IRIB/ Chief, Security Oversight Support Branch, NSIR/DSO/SOSB .
- a. Reviews and approves inspection manual documents that relate to the security cornerstone and emergency preparedness areas, respectively, of the cROP/ROP.
 - b. Approves and signs requests for regional comments on inspection manual documents that relate to the security cornerstone and emergency preparedness areas, respectively, of the cROP/ROP in accordance with applicable office guidance.
- 04.06 Chief, Construction Inspection Program Branch, NRO/DCIP/CIPB.
- a. Reviews and approves inspection manual documents that relate to the cROP. Provides final approval to issue minor (editorial) document revisions and deletions.
 - b. Approves and signs requests for regional comments on inspection manual documents that relate to the cROP in accordance with applicable office guidance.
- 04.07 Chief, Reactor Inspection Branch, NRR/DIRS/IRIB/ Chief, Performance Assessment Branch, NRR/DIRS/IPAB.
- a. Reviews and approves content for all inspection manual documents that relate to the ROP unless otherwise stated in this IMC. Provides final approval to issue minor document revisions and deletions. In addition to the designated NSIR branch chief review and approval identified in Subsection 04.05 above, the NRR/DIRS/IRIB BC reviews and approves content for inspection manual documents that relate to the security cornerstone and emergency preparedness cornerstone of the ROP. The IRIB/IPAB Branch Chief will notify DIRS management of IMC and IP revisions on a periodic basis.
 - b. Reviews cROP and non-ROP documents to ensure program alignment with no adverse impact on the ROP.
 - c. Approves and signs requests for regional and office comments for the ROP program documents.
 - d. Confirms Branch staff has performed a periodic review of each ROP document selected for revision, deletion or transfer document based on the review criteria described in Subsection 04.02.j. above. Assists in notifying stakeholders of the intent to revise, delete or transfer these documents from the active inspection manual as necessary. Most notification will be accomplished via the normal comment period described in IMC 0040.

04.08 Non-ROP Inspection Programs Division or Deputy Division Directors: NMSS.

Approves the content of documents necessary to carry out assigned program functions, and signs the DIF prior to sending the document to NRR for distribution.

- a. Confirms that documents meet the requirements of this IMC prior to signing the document issuing form (Exhibit 2).
- b. Approves and signs requests for regional comments on inspection manual documents in accordance with applicable office guidance.

04.09 Inspection Program Document Leads:

- a. Ensure inspection requirements, guidance, and governing documents remain relevant to the inspection program.
- b. Ensure the technical integrity of inspection manual documents and verify conformance with corresponding bases documents, if applicable.
- c. Develop and revise inspection manual documents necessary to carry out assigned organizational programmatic responsibilities that comply with NRC inspection program policies.
- d. Perform tasks consistent with internal office guidance, such as preparing memoranda to obtain comments on proposed new and revised inspection manual documents from other organizations and stakeholders, and ensures that all inspection manual documents conform to the appropriate guidance and basis documents (as appropriate) for each program office.
- e. Elicit appropriate stakeholder feedback from the regions and the NRC offices affected by drafts of new or substantially revised inspection manual documents. Receive and disposition comments received in a comment resolution summary, which is included in the Document Issuing Package as non-public. (See Subsections 06.04 and 06.05). Accepted comments are incorporated in the revised document.
- f. When technical or resource requirements change, ensure that any sample sizes affected are captured in inspection manual documents and reflected in RPS before the next inspection cycle.
- g. Ensure that any increase in the FTE inspection effort specified in an inspection manual document is formally approved by the cognizant program office before the document is issued or before it becomes effective.
- h. Inform NRC technical staff of a pending inspection manual document change and ensure that required training is identified and implemented prior to issuance.

- i. Prepare and route final drafts of newly created or modified inspection manual documents to the cognizant IM Coordinator when ready for issuance, in accordance with applicable internal office guidance.
- j. Closely coordinate with the cognizant IM Coordinator to ensure that document issuing packages are processed in accordance with Section 0040-06 requirements and applicable office guidance. In addition, provide "Owner" rights in ADAMS to Document Processing Center, the NRR IM Coordinator, (the IM Coordinators in NMSS, NRO, and NSIR where applicable), and Records Managers. "Viewer" rights are provided in ADAMS to NRC Users

04.10 Inspection Manual Coordinators: NMSS, NRO, and NSIR.

- a. Ensure that the appropriate inspection program organizations, NRC regional offices, and other affected NRC offices are given the opportunity to comment on documents affecting their programs.
- b. Verify that the requirements of this IMC are met in the preparation and approval of inspection manual documents.
- c. Ensure that the policies and procedures outlined in their office's internal guidance have been followed.
- d. Track the progress of draft inspection manual documents submitted to them for issuance and make the status of submitted documents available to those who submitted them, from the date of submission to the date of issuance.
- e. Accept final drafts of newly-created or modified documents prepared by the originating office for submission to the NRR IM Coordinator for final processing and issuance. Ensures the NRR IM Coordinator has "Owner" rights in ADAMS for all inspection documentation, i.e, the IMC, IP or TI to be issued, the Comment Resolution summary and the DIF.
- f. In cases where a program office seeks and receives subject matter expertise from another program office on an inspection manual document, the program office technical lead providing the expertise will route the IMC, IP or TI through the technical lead's office IM Coordinator to review and ensure applicable inspection program requirements have been met. The technical lead's office IM Coordinator will sign the DIF and return it to the originating office (i.e., office requesting subject matter expertise) to forward to NRR for issuance.

04.11 Inspection Manual Coordinator: NRR.

- a. Performs the same tasks for NRR as the IM Coordinators in other offices, as described above in Subsections 04.09.a. – 04.09.f., except in Subsection 04.09.c.

- b. Reviews NRR inspection manual documents for formatting issues and program applicability.
- c. Creates the document for comment memo, and addresses the comment memo to all regions and program offices.
- d. Accepts final drafts of newly-created or modified inspection manual documents from IM Coordinators of other offices for issuance in the Inspection Manual. No documents will be accepted from any individual other than an IM Coordinator identified in advance by the originating office's management.
- e. Returns final drafts of inspection manual documents to the IM Coordinators of originating offices other than NRR when further changes are required.
- f. Ensures that all format and other program requirements, such as program applicability, have been met for final drafts of inspection manual documents. If a large number of format and program requirements are not met, returns document to originator or administrative staff for corrections. May make minor format and program applicability changes as needed prior to issuance. (For inspection manual documents originating from offices other than NRR, verifies the approval of the office and cognizant division management, as appropriate, is documented on the DIF.)
- g. Enters an "Effective Date" on the title page, two spaces below the title, for ROP inspection manual documents, to minimize any impact on ROP implementation. Updates the Revision History Table to include the issue date, the Change Notice number, and any feedback form accession numbers. Removes any hyperlinks to previous Change Notice documents. Confirms format and program requirements have been met and issues the new or revised document in seven to ten (7 to 10) business days, unless otherwise directed by the Branch Chief, or Directors.
- h. Assures availability of inspection manual documents through the NRC's Agencywide Documents Access and Management System (ADAMS) and the NRC web site.
- i. Updates the Reactor Program System (RPS) to add Change Notice information and revise the baseline inspection procedure table with new samples sizes and requirements prior to the year they will be implemented, when necessary.
- j. Tracks the progress of draft inspection manual documents to final version and makes the status of submitted documents available to the IM Coordinators who submitted them, from the date of submission to the date of issuance.
- k. Includes in the ADAMS Change Notice package a Change Notice document, which summarizes document creation, revision, or deletion, a current standalone Table of Contents, the new or revised document, the Comment Resolution summary file (when applicable), the DIF, and any feedback forms that have been closed due to the changes made in the revised document.
- l. After the documents become official records in ADAMS, publishes inspection manual documents (either new or revised) on the public website (internal NRR website for security documents) based on the information provided on the DIF and the NRC Form 665 - ADAMS Document Submission Form (ML020171279), sends an e-mail to

announce the change notice is issued to the Agency staff listed on the Outlook Distribution list, as well as staff members listed on the DIFs of documents included in the Change Notice.

At the conclusion of the comment period, the document lead will resolve and incorporate the appropriate comments into the revised document, using the same accession number that was used for the regional comment period, unless the document has been made public for the comment period, then follows Section 0040-06 to provide a document issuing package to the NRR IM Coordinator. The document issuing package will include the revised document, a comment resolution summary, an NRC Form 665, a signed DIF, and any related FBFs that will be closed with the document revision.

0040-05 GENERAL INSTRUCTIONS FOR ALL DOCUMENT TYPES

In the ROP inspection program, documents must conform to IMC 0308, "Reactor Oversight Process Basis Document." If changes or revisions alter the scope or basis of an inspection manual document, appropriate updates to the ROP Basis Document are required. Once the need for a basis change is recognized, the appropriate changes to IMC 0308 will be submitted by feedback form and provided to the IMC 0308 owner for incorporation into the next issuance of IMC 0308, which should occur approximately every year.

In general, revisions to IMCs and IPs should not occur more than once every six months unless circumstances dictate the change. See Subsection 05.03 for further details regarding what would prompt a revision to an IMC, IP or TI. Consider the impact that changes in a particular inspection manual document (e.g., IMC, IP, TI, or OpESS) will have on other inspection manual documents. Contact the originating office of the affected inspection manual document(s) and coordinate further changes that are essential to maintaining consistency within the Inspection Manual.

05.01 Plain Writing Guidance. Plain language is communication your audience can understand the first time they read or hear it. Strive to communicate clearly and comprehensively. State clearly what the NRC technical staff is to do. Use specific and objective words. State who, what, when, where, and why. State conditions, limitations, and exceptions separately.

- a. Use short words, short sentences, and short paragraphs. If possible, avoid words that are not in common use outside of the NRC unless they are defined or explained. (Most of the inspection manual documents are publicly available). Divide long drawn-out sentences into two or more sentences. Try to limit paragraphs to 10 lines or less. Reorganize material to break lengthy, complex paragraphs into several paragraphs or a list.
- b. Read and edit draft material from the user's perspective. Replace wordy prepositions ("in the vicinity of") with one-word prepositions ("near").
- c. For further guidance, refer to NUREG-1379, "NRC Editorial Style Guide," and the Government Printing Office Style Manual (latest edition). These references can be found under the Plain Language Action Plan on the internal website. Also refer to Webster's dictionary (latest edition).

- d. Terminology must be consistent. Do not use two or more words for the same idea, concept, or activity. Except for abbreviations in common use, show the complete word, title, or phrase the first time it is used with the abbreviation in parenthesis immediately after. An example is service water system operational performance inspection (SWSOPI).
- e. The originator must make clear what is mandatory of NRC technical staff and what is discretionary. For example, use “must,” “shall,” and “will” to indicate mandatory requirements and “can,” “may,” “might,” and “should” to convey discretion.
- f. Since Web links (also known as hyperlinks) can change, the insertion of a Web link in a document is not preferred and should normally only be used to provide supplemental, non-critical information. The insertion of a web link in a public document must point to another public document or public web page, unless otherwise stated. Only use web links to NRC documents with accession numbers.
- g. For all new documents and those that contain extensive revisions, the originator will follow the Agency procedures to receive technical editing assistance.

05.02 Inspection Manual Document Requirements. All drafts and final documents must be prepared in Microsoft Office Word (MS Word), consistent with the format described in this IMC, and stored in ADAMS. Exhibit 10 provides guidance in using MS Word to prepare inspection manual documents.

- a. Format requirements listed in Exhibit 9 for tab settings, margins, horizontal graphics line, footers, and page numbering, must be followed.
- b. On the first line, centered, capitalized, and in Arial 19-point bold font, the words NRC Inspection Manual will be entered; and against the right margin, the organizational code in Arial 10-point font, entered.
- c. The main body and the footer must be in Arial 11-point font, left justified. Do not use bold, italic, shadow, or other appearances for emphasis or understanding. Underline only may be used for emphasis or understanding. The only exceptions are charts and graphs that may appear in the main body, and commitments, which are required to be in italics (see Subsection 06.03 of this IMC).d. All footers will be the same throughout the entire document with the following format: the issue date at the left margin and the document number at the right margin.
- d. Page numbers will be located at the bottom center of each page, and numbering will restart with each new document section: the table of contents (if any) within the document in lower-case Roman numerals; the body of the document with Arabic numbers, and attachments, exhibits, and tables with a designating prefix (letter or letter/number combination), hyphen, and number (e.g., the third page of Exhibit 4 as E4-3 – if the attachments, exhibits, and tables are not standalone documents). If the attachments exhibits, and tables are standalone documents from the parent IMC, the document number, in the right had corner of the footer, will reflect the type of document it is. For example, for IMC 2515 Appendix A will be:

Issue Date: page # 2515 App A

- e. The last page(s) of an inspection manual document will list the revision history (see Subsection 06.06 of this IMC) to include: the ADAMS accession number of the document, issue date and change notice number associated with the document creation or revision, an initial issuance statement or a brief description of the scope of the revision, training required to occur prior to document issuance as a result of the change, and the date the training was completed, the ADAMS accession number for comment resolution summary and closed feedback forms, and any commitment tracking identification numbers specific to the document (see Exhibit 5). If a revised document does not include a revision history table, a table will be created using the format in Exhibit 5, and completed by the Document Lead.
- f. The inspection manual document must be placed in ADAMS. The originator must ensure version control when revising and creating inspection manual documents by using the ADAMS check-out and check-in procedures and other version control techniques for exclusive use of official copies from ADAMS.
- g. All new or substantially revised inspection manual documents should be reviewed by an Agency technical editor.

05.03 Revisions to Documents. When it has been decided that either new inspection manual documents need to be issued, or existing inspection manual documents need to be revised, it is due to at least one of the following five reasons:

- a. Document Feedback: Inspectors and technical staff generally use the Inspection Program Feedback Form Process to submit comments and suggest changes to improve the implementation of the inspection program. IMC 0801 contains instructions for feedback form submittal, as well as the process, time line, and categorization used by inspection program offices to respond to comments.
- b. ROP Baseline Inspection Procedure Reviews: ROP Baseline Inspection Procedures are assessed to evaluate the effectiveness of the IPs and the usage of resources. This procedure review process, described in IMC 0307 Appendix B, "Reactor Oversight Process Baseline Inspection Procedure Reviews," may result in shifting of resources and inspection sample requirements.
- c. Periodic Review: All inspection manual documents will be reviewed for continued applicability and periodic updates. This review period may result in changes to the documents.
- d. Agency-Initiated Changes: Commission direction or inspection program changes may create the need of a change to inspection manual documents. This is the most common process for the development of Temporary Instructions. Agency-initiated changes do not require a feedback form.
- e. Response to External Assessments: Government Accounting Office (GAO) and Office of Inspector General (OIG) audits. These audits are infrequent and do not require a feedback form to track the changes, but feedback forms can be useful in this capacity.

Based on any of the above reasons, a new document is created and issued, or an existing document is revised and re-issued. In either case, an entire document is issued using the change notice process.

To make revisions, edit the MS Word version of the current document. First remove the existing vertical lines in the margins showing revised text and the red font of changed text by clicking on the Review tab and then accepting all changes in document. Save the document. Then set up the Track Changes options in MS Word to display insertions in red, deletions shown with a strikethrough, and Changed Lines in the Outside Border to always show balloons. (This will set up the formatting for the (on average) 30 day regional comment period. When the document is ready to be issued, all the deletions and formatting balloons will be accepted by the Document Lead, and only the red line additions with the track change bars in the left margin will remain to quickly point to where the changes have been made in the document.)

Both new documents and revisions are issued by a change notice, and noted in the revision history table of the IMC, IP, or TI, giving careful consideration in a revision to not delete generic inspection requirements inadvertently. In the case of a total re-write of a document, it is not necessary to mark the changes in red with lines in the margins, but major changes to the document still must be noted in the revision history table as part of the revision (see Subsection 06.06 of this IMC).

05.04 References. References must be directly relevant to the document and essential to its completion. The reference list will include all other inspection manual documents (IMC, IPs, and TIs) that appear in the document. References may not be used simply to convey historical information. References to another inspection manual document must include the type of document, the number, and the section or appendix (e.g., IMC 2500-05.01; IMC 2500, Appendix I). Reference to another section of the same document must include a phrase such as 'Subsection 04.01 of this IMC.'

Any commitment being added to a document (such as requirements of a generic letter) will also be listed in the section where it appears and identified with a commitment tracking number as described in Subsection 06.03 of this IMC. Commitments must also be included under the commitment section of the revision history page.

05.05 Incorporating Other Documents. Documents from the NRC or other agencies may be incorporated by reference into inspection manual documents when necessary to implement the inspection programs.

05.06 Requests for Guidance, New Documents and Revisions.

- a. Requests for clarifications on inspection governance, new documents, and revisions to existing documents applicable to the inspection manual documents should be initiated using the Feedback Process, as described in IMC 0801, "Inspection Program Feedback Process," to the greatest extent possible. This process will track the requests through the evaluation and editing periods.
- b. Requests for clarifications on inspection program governance, new documents, and revisions to existing documents other than those applicable to the ROP will be addressed to the Chief, NRR/DIRS/IRIB, or NRR/DIRS/IPAB, for reactor inspection and oversight programs or to the applicable manager in NMSS, NRO, or NSIR.

06.01 Training Considerations. When planning to revise an existing document or create a new document, assess the need for NRC technical staff to be trained. This determination will help to consider whether written guidance already exists, the complexity of the activity, and the frequency in which the staff performs the activity. In general, training should be developed for activities that require a new skill, are complex in nature, or require a subject matter expert to answer questions. When training is required, the originating organization is responsible for developing the technical content and determining the most appropriate training method, as well as ensuring that existing training is consistent with planned IMC, IP or TI revisions. If existing training is not consistent with an IMC, IP or TI revision, it will have to be revised to address the IMC, IP or TI changes. Training methods include updating written guidance, conducting a teleconference or video conference, recording the training on video tape, developing computer or web-based training, adding self-study or on-the-job training standards to existing qualification requirements, or conducting regional presentations. When selecting the training method, consider the time needed for all affected staff to complete the training and that training should be completed prior to issuing the inspection manual document.

06.02 Document Preparation. Develop a new document, or a revision to an existing document, in the current version of MS Word, using the structure and format requirements, described in this IMC.

Use the most current official inspection manual document as the starting point for a revised inspection manual document. Retrieve the current MS Word version of the document from the NRC web site and save it as a separate working file. To retrieve the most recent MS Word version: go to the NRC internal home page and follow these steps, click on: (1) Organization, (2) click on NRR, (3) click on ROP Digital City, (4) under the section "Inspection Documents" or "Security Documents," click on type of inspection manual document, and (5) locate the number of the document. The MS Word file associated with the document is the file labeled "doc" or "docx" on the public web, and linked to the MS Word icon on the internal website for security-related documents.

06.03 Incorporating Specific Requirements.

- a. There are instances when specific inspection requirements are placed in an inspection procedure to verify licensees continue to satisfy a specific commitment (e.g., identified in their response to a generic communication, such as a bulletin) or when policy changes are implemented (e.g. Commission direction or in response to an Office of the Inspector General (OIG) audit). When adding these specific requirements to an inspection manual document, the requirement will be identified as follows:
 1. The text that defines the specific requirement will be italicized. This is a specific exception to the requirement not to use italic text type in a program document for emphasis. Spacing before and after the text will be such that the information clearly stands out within the document.

2. A commitment tracking number will be assigned using the next sequential number available for that procedure. This number will be bracketed and entered following the italicized text (e.g., [CX]). The commitment tracking number will be added to the revision history page by the Document Lead.
- b. To delete a specific requirement that is no longer valid, the approval of the respective division director is required.

For IMC 0040, the following commitment applies:

To ensure that specific inspection requirements are not inadvertently deleted through a revision to a procedure, a review of the revision history section shall be performed. If the revision history does not cover a minimum of 4 years, then a review of all the change notices from the past 4 years for that document shall be performed and the results documented in the revision history page. Change Notices are located on the external NRC Web Page. [C1]

06.04 Regional and Office Comments. Drafts of new or substantially revised inspection manual documents must be sent for review and comment to offices, both programmatic and regional, that will be affected by the changes. Documents that will have an effect on more than one office, i.e., NMSS, NRO, and NSIR, need to be routed through the appropriate IM Coordinators to ensure affected divisions and regions have had the opportunity to comment on the document. IM Coordinators in NMSS, NRO, and NSIR will follow their appropriate internal office guidance, as well as issue a 30 day document for comment package to the affected program offices and regions. This document for comment package will include ADAMS accession numbers for the package, the memo or e-mail used to send the package, the IMC or IP, and the comment resolution summary. Each office's IM Coordinator will ensure comments from regional offices and other internal stakeholders of the document have been obtained according to the applicable office guidance. It is the responsibility of the originating office to obtain comments, perform comment resolution (which may include incorporating some comments into the revised document), and create a comment resolution summary page for each document.

- a. The purpose of the non-public review and comment period is to resolve issues specific to the proposed change to the document. Comments outside the scope of the proposed change are not appropriate for this process and should be submitted using the processes described in Subsection 05.06 of this IMC. However, depending on the nature of the comments received, it may be appropriate to include comments outside the scope of the proposed change. These non-editorial changes could be shared with the regions and the NRC offices affected - if they meet the review criteria - and may warrant an additional opportunity for comment. (The review and comment period is, on average, 30 days. Based on inspection program needs, the comment period can be either reduced or expanded. If additional time is needed for the review of NRR documents, the applicable inspection program branch chief must send a request for an extension to the Document Lead, NRR IM Coordinator, and IPAB or IRIB Branch Chief via e-mail.) On the rare occasion that an industry working group has been created to gain industry consensus on inspection documents, the Agency may make the draft document public and available to industry, by following the requirements in 5 CFR 1320, "Controlling Paperwork Burdens on the Public." This will be done at the Document Lead's discretion, and only under rare circumstances.

- b. Comments from the inspection program staff are important because they implement the inspection programs. However, requests for their comments must be controlled so they do not become burdensome on their workload. Minor, non-substantive changes do not need to be sent to the regions for comment. In those cases, the comment resolution column of the revision history table is marked N/A (see Subsection 06.06 of this IMC).
- c. Inspection program offices determine if a document must be sent to the regions by answering the following questions:
 - 1. Will the proposed document affect regional resources?
 - 2. Will the document affect regional programs?
 - 3. Would a regional perspective be beneficial to a proposed change?
 - 4. Does the document represent a policy change?
 - 5. Could any of the proposed changes to an existing procedure potentially change the document's context or impact the inspection program?

If the answer to any of the questions is "yes," then a draft of the document will be sent to all regions and other affected offices for comments. The exception would be a rapid substantive correction made to an inspection manual chapter or procedure which would not require regional comment. The NRR/DIRS/IRIB, or NRR/DIRS/IPAB, Branch Chief and, on occasion depending on the nature of the correction, NRR/DIRS Division Director or Deputy Division Director would make the final decision regarding whether or not to include the regions for comment.

The rules for sending draft documents to program office staff and the regions for comments are:

- 1. Consider regional workload, given the scheduling of end-of-cycle meetings and mid-year inspection plans that are sent to the licensee, semi-annual Division Director Counterpart meetings, semi-annual inspector counterpart meetings, and end of fiscal year activities, e.g., staff performance appraisals and budget cycle activities, to ensure availability of staff and management for review.
- 2. If more than six IMC and IP documents are anticipated to be issued to the regional offices for comment simultaneously then efforts must be made to consider issuing requests with time intervals between them and to issue higher priority revisions earlier.
- 3. Send only final drafts.
- 4. Identify a Document Lead in the originating office who the regions can contact to discuss the document.
- 5. Prepare the request far enough in advance of the document's deadline to allow for review of not less than 30 calendar days, unless otherwise specified.

6. Each program office will identify persons in each region and other stakeholders in organizations within the NRC to review the draft documents out for comment.
7. For requests for regional comments on new or revised inspection manual documents that involve major policy changes, send a copy to the Office of the Deputy Executive Director for Regulatory Programs and the Office of the Inspector General.
8. Provide owner access in ADAMS to the appropriate IM Coordinator, as well as the NRR IM Coordinator.

For ROP documents owned by NRR, each region and program office will collect comments from their staff and send one collective document of comments to the NRR IM Coordinator and the Document Lead.

06.05 Comment Resolution. A Comment Resolution summary accession number will be included with the 30 day comment memo sent to stakeholders at the time the IMC, IP or TI is sent to the inspection program staff for comments. The appropriate IM Coordinator, and the NRR IM Coordinator, will be given “Owner” rights in ADAMS, and the inspection staff will be given “Author” rights to add their comments to the summary. The inspection staff will be able to review the comments provided to NRR by other stakeholders prior to final issuance of a document if the comments are received during the comment period and placed into ADAMS. The originator will ensure the final version of the comment resolution summary includes a copy of all substantive written comments received with their disposition in ADAMS and list the accession number in the “Comment and Feedback Resolution Accession Number,” column on the revision history page of their IMC, IP or TI. (See Exhibit 4 for an example of a comment resolution summary.) NMSS, NRO and NSIR should submit their document issuing package to the NRR IM Coordinator, and include the comment resolution summary, to be declared as an official non-public record in ADAMS. Comments received by stakeholders, but not incorporated in the final version, will be discussed with the commenter prior to issuance.

06.06 Update or Create Revision History Table Page. Maintaining a revision history table page will ensure that requirements are not inadvertently deleted. If a revision history table page does not already exist for the document, it will be created by the originator using Exhibit 5 as an example. The first time the document is issued, the “Description of Change” column will include a statement that a four-year historical search¹ for commitments was conducted and whether or not commitments were found. Every revision after that will include a summary of the changes being made and reference any specific documents that support the changes, such as a feedback form. The revision history table is the only place in an IMC, IP or TI that does not show track changes. Emphasis, if necessary, will be done by the use of underline (see Subsection 05.02c). The training completion date, either actual or projected, (if training is required) in all cases is scheduled for a date prior to the document issue date (and effective date), and included in the revision history table.

¹ A four year historical search consists of, but is not limited to, a review of generic inspection documents which may include SECY papers, Staff Requirements Memoranda (SRM) and other relevant program documents from an event or occurrence that have a direct impact on the inspection document.

When applicable, inspection program feedback form numbers will be listed in the “Comment Resolution and Closed Feedback Form Accession Number” column. Only closed feedback forms will be referenced in the revision history table. ADAMS accession numbers of the document, closed feedback form, and comment resolution summaries will be listed in the appropriate columns of the revision history table. To provide an historical record of the document, list the ADAMS accession numbers for previous revisions. The issue date will be filled in by the NRR IM Coordinator prior to issuing the final document.

Note: The revision history table page identifies certain commitments. In addition to being used as a mechanism for knowledge transfer and to generate the change notice, it also is a way to quickly identify why the document was created or modified and the last time it was reviewed. Documents not containing a revision history table page will be returned to the originator for correction.

06.07 Document Issuing Package. It is the responsibility of the IM Coordinator of the originating office to ensure that all documents are correctly formatted and that the comment resolution summary is profiled in ADAMS as non-public prior to routing to the NRR IM Coordinator. Exhibits 5 6, and 7 shall be used to meet this requirement. Documents failing to adhere to the guidelines provided in these exhibits will be returned to the IM Coordinator of the originating office, and then to the originator for correction. Before routing the document to its IM Coordinator, the originating organization will confirm the final version of the new or revised document (using the same accession number used for the draft inspection manual document sent for comment), has been uploaded to ADAMS. The NMSS, NRO, and NSIR document originator, their organization’s administrative staff, or IM Coordinator, will also ensure that the DIF and comment resolution summary have been profiled into ADAMS as non-sensitive and non-publicly available (unless otherwise noted by their specific inspection program requirements), and prepare a hard-copy document issuing package to be sent to the NRR IM Coordinator (NRR staff members do not need to create a document issuing package in ADAMS. The NRR IM Coordinator will do that.) “Owner” rights to the final document, comment resolution summary, and DIF will be granted to the originating office IM Coordinator and the NRR IM Coordinator. Once the inspection document package has been reviewed, and corrected for formatting or ADAMS profiling (if necessary), the NRR IM Coordinator will forward the entire package to the appropriate DIRS Branch Chief, either IPAB or IRIB, for approval of minor document revisions, and sometimes the DIRS Director or Deputy Director for approval of new, substantial, policy or program changes, as they relate to the ROP. A complete document issuing package consists of the following:

- a. A completed and signed paper copy of the DIF (templates for each inspection program DIF are found in ADAMS. Their accession numbers are listed in Exhibit 2.). One DIF can be used for multiple documents, or a series of documents (such as 71114) as long as the documents have the same Document Lead. List each document and its accession number separately on the DIF. Do not list an ADAMS package accession number on a DIF. If more than one program office provides input to creating or revising a document, additional signature lines may be added to the DIF. If the resources of another program office are anticipated to be used in the inspection activity, an additional line for the signature of a branch chief or division director or deputy division director of that program office must be added. Electronic template files of the DIFs (Exhibit 2) are found in ADAMS. When profiled in ADAMS, “Owner” rights are given to the IM Coordinator of the originating office as well as the NRR IM Coordinator. The signed DIFs are included in the final Change Notice ADAMS package as non-public, by the NRR IM Coordinator.

- b. A paper copy of the final version of the document to be issued, including color copies of any graphics or exhibits that are intended to be shown in color. All documents must have an updated revision history table, and will include the accession number of the comment resolution summary document where applicable. In addition, if the document revision caused a feedback form to be closed, the feedback form number and its accession number will be included on the revision history table page. The paper document must be identical to the electronic version of the document in ADAMS.
- c. A paper copy of the comment resolution summary (see Exhibit 4), as well as any open feedback forms that will be closed by issuing a new or revised document. An electronic copy of the comment resolution summary, profiled in ADAMS as non-public, will be copied into the ADAMS Change Notice package.
- d. Completed NRC Form 665 for the final document to be issued, the comment resolution summary and any feedback forms that will be closed when the document is issued. NRC employees should refer to Management Directive (MD) 3.4, "Release of Information to the Public, MD 3.53, "NRC Records and Document Management Program," and NUREG/BR-0273, "ADAMS Desk Reference Guide," at a minimum for completing NRC Form 665.

06.08 Deleting Documents. For documents in which the inspection activity is complete or no longer applicable, the originating organization shall submit the DIF (Exhibit 2), with the box "Deletion" checked and write the reason for deletion. The document will be removed from the active documents of the Inspection Manual that are listed in the standalone Table of Contents and posted on the Web. The DIFs for each deleted document will be profiled in ADAMS and declared an official Agency record (OAR).

06.09 Inspection Manual Coordinator's Review. The originating organization of any NMSS, NRO, or NSIR document will route all inspection manual document packages to the respective office's IM Coordinator for review. Upon satisfactory review, the originating office's IM Coordinator will submit the document(s) to the NRR IM Coordinator. NRR documents are routed directly to the NRR IM Coordinator after administrative staff have profiled the IMCs, IPs or TIs in ADAMS, based on the NRC Form 665 provided to the administrative staff by the Document Lead. Documents submitted to the NRR IM Coordinator that are not ready for issuance will be returned to the IM Coordinator of the originating office, or the appropriate NRR division, for correction, as required. The NRR IM Coordinator reviews the document for publication.

Baseline inspection procedure revisions that affect sample requirements in the RPS must be discussed with the Document Lead during the NRR IM Coordinator's review and prior to issuing the revision. The baseline procedure table for the upcoming cycle must be updated to prepare for the future inspection cycle.

06.10 Final Approval. Final approval of program documents for inclusion in the Inspection Manual is given by the division director or deputy division director of the originating office, other than NRR. The NRR/DIRS/IRIB (or IPAB) branch chief will approve minor revisions (i.e. editorial) to existing documents. The NRR DIRS Division Director, or Deputy Division Director, will approve major revisions and policy changes to an existing document, as well as the issuance of a new document. The NRR IM Coordinator will publish the change notice on the NRC Web site.

06.11 Standard Distribution of Inspection Manual Documents. New and revised Inspection Manual documents are distributed by publication of a change notice (see Subsection 03.02.k. of this IMC).

Document leads within NRR will ensure that the document is distributed to any necessary staff in addition to the standard change notice distribution list. IM Coordinators and inspection program counterparts outside of NRR must ensure that the document gets the widest dissemination necessary in accordance with internal office policy.

Minor editorial changes to documents (to update Exhibits to match other documents, correct minor spelling errors, etc.), found within six months of the original issuance will be submitted by the Document Lead to the NRR IM Coordinator, who will submit a request to either the IPAB or IRIB Branch Chief to replace the original document in ADAMS. Once the Document Processing Center replaces the document, the NRR IM Coordinator will send out an e-mail to the Change Notice recipients to alert them of the change. Minor editorial changes will not affect the document pagination. If they do, a new document will need to be issued by following the document issuing process described in this IMC. If minor editorial issues are found after the six month time frame, a new revision of the document will be issued by following the document issuing process.

0040-07 DOCUMENT TYPES AND FORMATS

The Inspection Manual is divided into 100 parts numbered 0000 through 9900 (0000 is the first part, 0100 is the second part, etc.). Inspection manual documents within the parts have 4-digit numbers (inspection manual chapters), 5-digit numbers (inspection procedures), or 7-digit numbers (temporary instructions). When a new inspection document (IMC, IP or TI) is being created, a number will be assigned by the NRR IM Coordinator. The requestor must send an e-mail to the NRR IM Coordinator with the title and subject matter of the new document.

07.01 Inspection Manual Chapters. Inspection Manual Chapters numbered 0000 through 1999 are used for policy statements on the inspection programs and the inspection manual. Inspection Manual Chapters 2000 through 2999 define the various inspection programs. The first two digits of the inspection manual chapter number identify the administrative or inspection category, and the last two digits identify the inspection program.

For example, the first two digits of IMC 2515 identify the inspection program (reactor), the third digit identifies the type of reactor (light water), and the fourth digit identifies the operational phase (operations) – “Light Water Reactor Inspection Program – Operations Phase.” Inspection manual chapters include the following most common headings (more can be added if necessary):

- a. Table of Contents (TOC). Due to the amount of information provided in an IMC, a table of contents shall be included to allow the user to make more efficient use of the document. Pages of the Table of Contents shall be numbered with lower-case Roman numerals. Do not use bold or underline in the Table of Contents. If an IMC contains a TOC, the title page will be blank after the title (and effective date, if the effective date is necessary). The TOC will start on the second page of the document with the page number of “i”. If there is no TOC, the body of the document can start three line spaces after the title and effective date, if the effective date is necessary.

- b. Section 01, "Purpose." Provides a broad statement of the topic covered by the IMC.
- c. Section 02, "Objectives." Used to state the aim of the program or functions covered by the IMC. This section is not required if this information is already covered in Section 01.
- d. Section 03, "Applicability." Identifies the type of facilities, operations, actions, or population for which the IMC is applicable. The applicability section is optional.
- e. Section 04, "Definitions." A definition is only necessary if the term is used in a special sense or the meaning may not be clear to the user.
- f. Section 05, "Responsibilities and Authorities." Provides a brief description of ownerships arranged from higher to lower levels of authorities.
- g. Section 06, "Requirements." This section is used to provide the specific instructions to satisfy the inspection requirements of the IMC. This section is used to specify what is mandatory of NRC technical staff. For example, "must," "shall," and "will" must be used to indicate mandatory requirements.
- h. Section 07, "Guidance." This section is used to provide specific guidance corresponding to the inspection requirements in the IMC but will only include discretionary provisions (i.e., "can," "may," "might," and "should").
- i. Section 08, "References." The reference section lists all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document, plus other relevant documents as described in Section 05.04. Additional sections can be used beyond 07, as required, to provide better structure to the document.

07.02 Inspection Procedures. IPs are subdivisions of Parts 3000 – 9800 of the Inspection Manual, are five-digit numbers, and describe the activities to be performed by an inspector to implement a part of an inspection program. For example, the first two digits of IP 71111 "Reactor Safety-Initiating Events, Mitigating Systems, Barrier Integrity," identify the part of the Inspection Manual (7100 Operations (License & TS Requirements)), and the 111 is the number of the procedure in the sequence of procedures in Part 7100. (Pilot inspections will be considered for a new or substantially revised NRC requirement(s). The purpose of the pilot inspection is to determine the adequate inspection scope and requirements which NRC should verify to ensure that the licensee is in compliance with either a new or substantially revised NRC requirement(s). Pilot inspection procedures can be in effect for several years and are cancelled once the results, as appropriate, are incorporated into the inspection program.) All pilot procedures will align with the appropriate basis document, to the greatest extent possible.

IPs include the following sections:

- a. "Program Applicability." Identifies the specific IMC(s) to which the IP applies, and will be reviewed and updated, as necessary, with each inspection procedure revision. (For example, IMC 2515A applies to the baseline inspection procedures.) Program Applicability is not to be used as an over-arching reference to an inspection program parent document. If the procedure is not used directly towards an inspection, the inspection program parent document should be listed in the reference list.

- b. Section 01, "Inspection Objective(s)." States the objective(s) of the IP.
- c. Section 02, "Inspection Requirement(s)." Describes the requirements for completing the procedure and achieving its objectives. This section must specify systems, components, and records to be inspected and inspection methods such as sampling (including sample sizes), observation, records review, and interviews. The IP should not involve excessive reviews of documents. Some auditing of documents (e.g., reports, analyses) may be necessary, but the emphasis will be on inspecting equipment and observing licensee activities. Ensure it is clear to the inspector what portions are mandatory and what, if any, are optional. Specifically, the Document Lead must make clear what is mandatory of NRC technical staff and what is discretionary. For example, use "must," "shall," and "will" to indicate mandatory requirements and "can," "may," "might," and "should" to convey discretion. To the extent possible, discretionary language will not be used under inspection requirements.
- d. Section 03, "Inspection Guidance." This section may contain specific guidance that corresponds to each inspection requirement but will only include discretionary provisions (i.e., "can," "may," "might," and "should"). Specific guidance explains how individual requirements can be accomplished and alerts the inspector to potential problems or challenges. For new procedures, the guidance section can be used to tell the inspector how the originating office intended the requirements to be accomplished.

For existing procedures, the guidance must reflect experience gained or problems encountered in performing the inspection.

Note: The inspection guidance section may offer general as well as specific guidance and each inspection requirement must have a specific number or letter assigned to it for identification purposes. The identifier will be used in the inspection guidance section to associate the specific guidance to the associated requirement. When there are two separate sections, if no guidance is given for a requirement, the corresponding identifier in the guidance section will use the phrase, "No inspection guidance."

- e. Section 04, "Resource Estimate." An estimate of the average time needed to complete the inspection (not including preparation and documentation time). This estimate is for broad resource planning and is not intended as a measure for judging the inspector's or the region's performance. Actual inspections may require substantially more or less time, depending on the individual circumstances.
- f. Section 05, "Procedure Completion." Defines the minimum sample size to be inspected and reported in RPS in order to consider the procedure complete. Describes what is meant by inspection sample(s) and how samples are counted.
- g. Section 06, "References." Lists documents that will be immediately helpful to the inspector in performing the inspection procedure. The reference section is not intended to be a historical listing of documents about the inspection area. It will be limited to those references directly relevant to performing the procedure. Inspection manual documents will not reference documents, policies, or practices of the Institute of Nuclear Power Operations (INPO).

The reference section must list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document. For NRC documents where the ADAMS accession

number (e.g., ML003717333) is included, it should be listed last. Regulatory guides and industry standards and codes do not need an ADAMS accession number.

07.03 Baseline Inspection Procedures Baseline inspection procedures are standalone inspection procedure attachments for the operating reactor risk-informed baseline inspection program. These baseline IPs include both requirements and guidance. (For example, IP 71111.01, “Adverse Weather Protection,” is a standalone baseline inspection procedure to IP 71111.) For this program, the baseline inspection procedures correspond to “inspectable areas” (as defined in program basis documentation) within the “cornerstones of safety” that form the foundation of the ROP (see IMC 2515, “Light-Water Reactor Inspection Program – Operations Phase”).

In addition to some of the headers used from the basis document, the operating reactor baseline IPs follow the same formatting requirements of the inspection procedures. The following headers on the first page of each baseline IP help the inspectors (and industry) understand specifically what is being inspected: (Document Leads who own baseline IPs will notify the NRR IM Coordinator of sample size changes, or additional sample requirements, prior to issuing the baseline IP for 30 day review. Ideally, the baseline IP will be issued in the year prior to when the change becomes effective. The effective date will then be January 1 of the next year or inspection cycle, and the RPS baseline table will be updated to reflect the change in the next inspection cycle.)

PROGRAM APPLICABILITY: (insert IMC XXX Appendix Y here)

CORNERSTONE: applicable cornerstones, such as initiating events, mitigating systems, barrier integrity (IMC 2515 Appendix A, Attachment 1)

INSPECTION BASES: the bases that defines the inspectable area **for operating reactors the reference will be to IMC 0308 Attachment 2)**

SAMPLE REQUIREMENTS: **is a table that** defines the number of required **sample** reviews, and the hours necessary to complete the reviews, as described in the attachment. If multiple types of samples in a procedure have specific requirements to ensure completion of the procedure, each of these specific sample requirements will be addressed in this section.

Standalone attachments, such as the baseline inspection procedures, will also follow the document formatting requirements that all inspection documents follow, **to the greatest extent possible**, as outlined and defined in this inspection manual chapter.

The baseline inspection procedures will follow the format and content of the IPs, as described above, **with the following exceptions:**

Section 02, “General Guidance.” This section will contain general guidance that corresponds to each inspection requirement and will include discretionary provisions (i.e., “can,” “may,” “might,” and “should). In addition, this section will discuss sample considerations with risk priority and specific examples.

Section 03, “Inspection Samples.” This section will list each inspection sample with specific sample requirements. The specific requirement of each sample will be emphasized in bold for baseline inspection procedures only. Specific guidance will follow each described sample.

Section 04, "References." This section must list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document, when applicable. For NRC documents where the ADAMS accession number (e.g., ML003717333) is included, it should be listed last. Regulatory guides and industry standards and codes do not need an ADAMS accession number. References and links to web pages must be public, unless specifically identified as non-public.

Any changes made to the baseline inspection procedure requirements must be reviewed with the Document Lead and added, or revised, in the baseline procedure table of RPS prior to issuance.

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

TIs are issued to supplement an inspection program and generally are placed in effect for a period of 12 to 24 months. They are used for a one-time initial inspection of a safety issue or a one-time collection of information, but not to provide policy and guidance information to the licensee. If a TI will be in effect for more than 24 months, special justification is required.

Requests for new ROP TIs **must** be directed to the Reactor Inspection Branch Chief (NRR/DIRS/IRIB) to obtain approval for budget estimates. This request would typically be made via e-mail, after completing the ROP TI Request Form (**ML16312A370**) as soon as the need for a TI is identified. The request **will** include the necessary background to understand why a TI is required, or warranted, including why the information should not be obtained by other means (e.g., OpESS or generic communication), an estimate of required resources and site applicability, an assessment of the safety or security significance providing justification for such resource expenditures, and the estimated dates for start and completion. The IRIB Branch Chief will discuss the proposed TI with the Regional counterparts to obtain their views on the implications of the proposed TI. If the IRIB Branch Chief approves the TI request, it will be forwarded to the DIRS Division or Deputy Division Director to provide final approval to proceed with the TI, or denial to issue the TI.

A TI is, on average, a 10 to 25 page document that is in effect for a 12 to 24 month period. Their purpose is to have inspectors concentrate on a specific, current issue, not an overall program. Any TI that will be more than 25 pages should consider specifically what it is asking the inspectors to do. If a TI will be in effect for less than 12 months, or more than 24 months, the originator must provide a special justification to the NRR/DIRS/IRIB Branch Chief by e-mail. The request to extend the TI should be received in a timely manner prior to its expiration. If it is not, the originating inspection program will be contacted to discuss prior to the TI being deleted via a Change Notice and closed (deleted) in RPS.

Each TI has an expected completion date, as well as an expiration date. If the stated purpose of the TI has not been accomplished by the expiration date, or if there is a need to add clarification to existing requirements and guidance, the originating organization may revise and reissue the TI. The revised TI must be accompanied by a document issuing form (Exhibit 2)

justifying the re-issuance. TIs are the only inspection manual documents that use revision numbers. Revisions of other inspection manual documents are indicated only by the new issue date. TIs will contain the following information:

Cornerstone (for ROP TIs only). Lists the cornerstone(s) for which the TI is applicable.

- a. Applicability. Identifies the facility or facilities, site(s), and unit(s) for which the TI is applicable.
- b. Section 01, "Objective(s)." Lists the objective(s) of the TI. For multiple objectives, use a bulleted list. This section also states whether the nature of the TI is performance-based or information-gathering.
- c. Section 02, "Background." This section provides critical and pertinent background information required to understanding the generic issue and assist in the implementation of the TI. This section will specifically describe the reasons why this TI is being issued including an assessment of the safety or security significance and justification of resources expenditures.
- d. Section 03, "Inspection Requirements." This section presents, in a numerically-ordered list of distinct, concise statements, the specific inspection items that need to be accomplished in order to meet the objective(s) stated in Section 01. Each numbered requirement shall be followed by specific guidance to implement the requirement. This section must specify systems, components, and records to be inspected and inspection methods such as sampling (including sample sizes, if necessary), observation, records review, and interviews. The TI should not involve excessive reviews of documents. Some auditing of documents (e.g., reports, analyses) may be necessary, but the emphasis will be on inspecting equipment and observing licensee activities. Ensure it is clear to the inspector what portions are mandatory and what, if any, are optional.
- e. Section 04, "Inspection Guidance." This section may contains specific guidance. After each requirement, specific inspection guidance must follow. Specific guidance explains how individual requirements can be accomplished and alerts the inspector to potential problems but will only include discretionary provisions (i.e., "can," "may," "might," and "should"). Clearly identify guidance, so it will not be mistaken for additional inspection requirements. For new TIs, the guidance section can be used to tell the inspector how the originating office intended the requirements to be accomplished. For existing TIs, the guidance must reflect experience gained or problems encountered in performing the inspection.

TIs emphasize observing activities. They are not to be used for solely reviewing documents. TI requirements are to be performance-based, clearly stated, and focused on the implementation of programs, modifications, and procedures. However, TIs that are information-gathering by nature may involve inspection requirements for Agency inspectors that are slightly different from performance-based requirements. Revisions of existing TIs may have separate sections for inspection requirements and inspection guidance based on specific organizational needs.

- f. Section 05, "Reporting Requirements." States where and how the TI results will be documented. In most cases, TI results are documented in inspection reports, (e.g., in accordance with IMC 0612, Power Reactor Inspection Reports)." The TI will specify the

location and information required to be documented. In cases where the inspection results are not to be documented in a routine inspection report, sufficient additional information must be provided regarding the specific reporting requirements. Any non-standard distribution of reports documenting the TI inspections must be specified in this section (e.g., filling out a table that is attached to the TI and e-mailing it to NRR for review).

- g. Section 06, "Completion Schedule." This section includes an expected date for completion of the TI. This date should be reasonable and should precede the expiration date of the TI to allow the originating organization sufficient time to interpret, analyze, and report the TI results. For ROP TIs, completion dates should be the last day of a calendar year quarter (March 31, June 30, September 30, or December 31).
- h. Section 07, "Expiration." States the effective duration of the TI and includes an expiration date, which marks the official end of the TI. In establishing the expiration date for TIs under the ROP, consider the amount of time beyond the completion date the staff will need to complete the inspection report and associated enforcement activities. After the expiration date, no resources will be charged to the TI, and the originating organization will follow the procedures described in Section 06.08 of this IMC to delete the TI from the Inspection Manual.
- i. Section 08, "Contact(s)." This section identifies the originating organization (office, division, and branch) and the name, phone number, and e-mail address of document contact(s) who are designated to answer questions about the TI. Usually the author of the TI is considered the lead document contact. Other document contacts may include, but are not limited to, other staff within the branch and the immediate supervisor of the Document Lead.
- j. Section 09, "Statistical Data Reporting." This section identifies temporary instruction number(s), the associated system codes (e.g., Inspection Planning Element (IPE) and activity codes) for the TI and, if necessary, the inspection procedure and code to which an inspector will charge time for any follow-up inspections after the TI has been completed. For ROP-related TIs, all inspection effort must be charged to TI 2515/XXX (which represents the number of the TI), the IPE code of TI, and the activity code of TPD for preparation and documentation.
- k. Section 10, "Resource Estimate." This section presents an estimate of the direct inspection effort (DIE) in hours per unit or site needed to complete the TI inspection requirements. The estimated average time includes a band (i.e., a low and a high estimate). If the resources during the implementation of the TI can be attributed to other IPs other than the TI, provide a list of potentially applicable IPs, and an estimate (in hours) of the potential usage.
- l. Section 11, "Training." This section states the required training needed in order to successfully accomplish the inspection requirements. If the necessary training needed is covered by program office's general training and qualification program (e.g., IMC 1245, Qualification Program for the Office of Nuclear Reactor Regulation Programs,) stating the applicable appendix of training IMC will suffice.

- m. Section 12, "References." Lists documents that will be immediately helpful to the inspector in performing the TI. The reference section will list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document.

When the originating organization determines that the stated purpose of the TI has been accomplished, it will prepare a final report documenting the TI results for distribution to pertinent staff no later than the expiration date. The final report may also recommend additional inspections or changes to the inspection program. In those cases, the originating organization shall add the appropriate branch chief (for the ROP, Chief, IRIB or IPAB), to the distribution.

When the stated purpose of the TI has been accomplished, the originating organization will delete the TI by submitting a DIF (Exhibit 2) to the IM coordinator. All TIs shall be deleted by the expiration date.

07.05 Operating Experience Smart Samples (OpESSs). OpESSs may be employed to inform and enhance ROP inspection of selected OpE issues determined to have potential generic safety implications. OpESSs are only developed when an inspection can be accomplished within existing ROP inspection requirements and level of effort. Issues that cannot be addressed within existing ROP inspection requirements and level of effort should be considered for a one-time inspection under a TI.

OpESSs contain the following information:

- a. Cornerstone. List the cornerstone(s) for which the OpESS is applicable. The cornerstone(s) may include one or all of the cornerstones listed for the ROP pertinent inspection procedure(s).
- b. Applicability. Identifies the type of plant (e.g., PWR, BWR, CE, Mark 1 containment, etc.) that is affected or could be inspected under the OpESS.
- c. Section 01, "Objective(s)." Lists the objective(s) of the OpESS. The objective(s) may be more specific than those specified in the selected inspection procedure(s) but must be congruent with the stated objective(s) of the selected inspection procedure(s).
- d. Section 02, "Background." Presents OpE associated with the OpESS and relevant research and references.
- e. Section 03, "Inspection Guidance." Provides the information and links for inspectors to use during inspection of the OpESS. Include a list of applicable ROP baseline IP(s) and how the OpESS satisfies one (or more) of the sample requirements for the IP(s). The guidance may be more specific than those specified in the selected IP(s), but must be congruent with the stated objective(s) of the selected IP(s).
- f. Section 04, "References." List of documents that will be helpful to the inspector in performing the OpESS. These may include related generic communications, management briefing slides, Regulatory Guides, INPO documents, previous related inspection findings, and OpE communications. Include hyperlinks when available.
- g. Section 05, "Reporting Results/Time Charges/Additional Issues." In general, OpESS results will be documented and inspection reports will be distributed in accordance with guidance specific to existing inspection procedure(s) and IMC 0612, "Power Reactor

Inspection Reports.” Any guidance on non-standard documentation or distribution will be specified in this section. In addition, provide guidance on how inspectors are to charge their time under the baseline ROP inspection program.

- h. Section 06, “Contact(s).” Identifies the name, phone number, and e-mail address of the document contact(s) who are designated to answer questions about the OpESS. This is generally the OpESS author and applicable NRR contacts. This contact information may be redacted from the OpESS posted on the NRC public webpage.
- i. Attachments. May be used as necessary to provide additional information related to the OpESS.

07.06 Appendix. An appendix incorporated within an IMC, IP or TI will contain supplementary guidance material about the parent document. Appendices must pertain to the IMC, IP, or TI to which they are appended within the document itself, and follow the format of the parent document to the greatest extent possible. They do not contain policies, responsibilities, or requirements, which have been discussed in the parent document.

A standalone IMC appendix format will follow the parent IMC format as much as possible, and, on rare occasions, may contain additional policies, responsibilities, or requirements that are not discussed in the basic document. Exceptions to this rule must be documented in the revision history table. Both incorporated and unincorporated appendices will be depicted by a letter (A, B, C, etc.) in the appendix title. (Several security documents use the term “Addendum” instead of “Appendix”. The use of addendum, which has been utilized since the beginning of the Security ROP, is only found in a small number of security documents that have been vetted through industry. Because industry has seen, utilized, and referenced these documents, it would be difficult to change the documentation that uses “Addendum” instead of “Appendix”. Only security documents will use the term “Addendum”. All others must use the term “Appendix”.)

- a. Section 01. “Purpose.” Briefly explain why an appendix is being provided.
- b. Section 02. “Objectives.” Provide necessary information to understand the guidance of the appendix, as well as its context.
- c. Section 03. “Applicability.” Identifies the type of facilities, operations, actions, or population for which the IMC is applicable. The applicability section is optional.
- d. Section 04, “Definitions.” A definition is only necessary if the term is used in a special sense or the meaning may not be clear to the user.
- e. Section 05, “Responsibilities and Authorities.” Provides a brief description of ownerships arranged from higher to lower levels of authorities.
- f. Section 06, “Requirements.” This section is used to provide the specific instructions of the IMC.
- g. Section 07, “Guidance.” This section is used to provide specific guidance to this IMC.

- h. Section 08, “References.” The reference section will list all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document, plus other relevant documents as described in Section 05.04. Additional sections can be used beyond 07, as required, to provide better structure to the document.

Unincorporated appendices for IPs and TIs are extremely rare, but must follow the parent document to the greatest extent possible.

07.07 Attachment. An attachment incorporated within an IMC, IP or TI will contain additional instructional material. Attachments must pertain to the IMC, IP, or TI to which they are appended. They will not reiterate policies, responsibilities, or requirements, which are covered in the basic document. An attachment format, either incorporated or unincorporated, will follow the parent document format as much as possible, and will be depicted by a number (1, 2, 3, etc.) in the title. If an unincorporated attachment cannot follow the format of the parent document, the exception must be documented in the revision history table.)

A standard exception to the format of an attachment would be the revision history table. The revision history table is an inclusive attachment to an inspection manual chapter, inspection procedure and temporary instruction that outlines the revisions made to the document on a summary page, and follows its’ own format, which is outlined in Exhibit 5. Revision History tables are created with the initial issuance of an IMC, IP or TI, and updated with every revision. The Description of Change column describes what was changed and why.

07.08 Table. Every incorporated table will have a number (Table 1, 2, etc.) and will be cited in the text by that number. In general, tables will have titles, and the text within the table will be font Arial 11, but can also be font Arial 9 or 10, depending on the size of the table. Standalone tables will follow the format of the parent document to the greatest extent possible. Standalone tables that are the exception to this rule must document the reason for not following the parent document format in the revision history table.

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

07.10 Exhibit. Every exhibit will be numbered (Exhibit 1, 2, etc.) and be cited in the text by that number. Exhibits, both incorporated within a parent document and standalone, will follow the format of the parent document to the greatest extent possible. Exceptions to this rule in the standalone exhibit must be documented in the revision history table.

07.11 Issue Date. The issue date is on each page of the document in the form XX/XX/XX and is placed at the lower left of the page in the footer (as illustrated in this IMC). The actual date will be entered by the NRR IM Coordinator before the document is issued. The format for the issue date is: “Issue Date: XX/XX/XX” (2 spaces after the colon).

07.12 Document Number. The document number is put at the bottom right footer of all pages containing an issue date. Revisions of inspection manual documents have the same number as the original document. The NRR IM Coordinator is responsible for assigning numbers for new inspection manual documents. Office IM Coordinators and NRR document originators will send a request to the NRR IM Coordinator

to reserve numbers for new inspection manual documents before the document issuing package is prepared.

0040-08 REFERENCES

[5 CFR 1320, "Controlling Paperwork Burdens On the Public."](#)

IMC 0305, "Operating Reactor Assessment Program"

IMC 0307 Appendix B, "Reactor Oversight Process Baseline Inspection Procedure Reviews"

IMC 0308, "Reactor Oversight Process (ROP) Basis Document"

IMC 0611, "Power Reactor Inspection Reports"

IMC 0801, "Inspection Program Feedback Process"

IMC 1245, "Qualification Program for Operating Reactor Programs"

IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document"

IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase"

IMC 2523, "NRC Application of Operating Experience."

IMC 2600 Appendix A, "Guidance for Conducting Fuel Cycle Inspections"

IMC 2800, "Materials Inspection Program"

Management Directive (MD) 3.4, "Release of Information to the Public"

MD 3.53, "NRC Records and Document Management Program"

MD 3.57, "Correspondence Management"

MD 12.2, "NRC Classified Information Security Program"

MD 12.7, "NRC Safeguards Information Security Program"

[NUREG-1379, "NRC Editorial Style Guide"](#)

[NUREG/BR-0273, "ADAMS Desk Reference Guide"](#)

OEDO Procedure 0357, "Correspondence Management" (Non-Public)

OVRST-102, "NRR Procedures for Processing Inspection Manual Documents" (Non-Public)

[U.S. Government Printing Office Style Manual](#)

END

Exhibits:

1. Pictorial view of IMCs, IPs and Supporting Documents
2. Document Issuing Form(s) (DIF)
3. Example of Comment Memo
4. Example of Comment Resolution Summary
5. Example of Revision History Table Page
6. Examples of Inspection Manual Documents First Pages
7. Example of a Reference List
8. Example of a Change Notice
9. Format Requirements Checklist
10. Guidance for Using MS Word 2013

Figures:

- Figure 1: Example of Paragraph Formatting
Figure 2: Mark Table of Contents Entry
Figure 3: Table of Contents
Figure 4: Table of Contents Options
Figure 5: Advanced Track Changes Options

Forms:

Change Notice: [ML16334A035](#)

Comment Resolution Summary: Word version: [ML16333A293](#)
Excel version: [ML16333A291](#)

DIFS: NMSS: [ML16308A304](#)
NRO: [ML16308A305](#)
NRR: [ML16308A237](#)
NSIR: [ML16308A307](#)

NRC Form 665 – ADAMS Document Submission Form: [ML020171279](#)

Revision History Table: [ML16333A296](#)

ROP TI Request Form: [ML16312A370](#)

Attachment 1: Revision History for IMC 0040

Exhibit 1: Pictorial View of IMCs, IPs, and Supporting Documentation

Inspection Manual Chapters: (Policy)

- Written statements of policy that cover most NRC oversight and inspection program areas (e.g., reactors, materials, reactor construction, fuel facilities, etc).
- State the purpose, objectives, definitions, responsibilities, authorities, and basic requirements for inspection programs.
- Defines the program through a listing of inspection procedures, which is normally appended to the IMC

Inspection Procedures: (Implementation of Policy)

- A statement of objectives, requirements and specific guidance for inspection activities, which are focused on safety, security, or safeguards.
- Describe the activities performed by an inspector or technical staff, including administrative requirements.

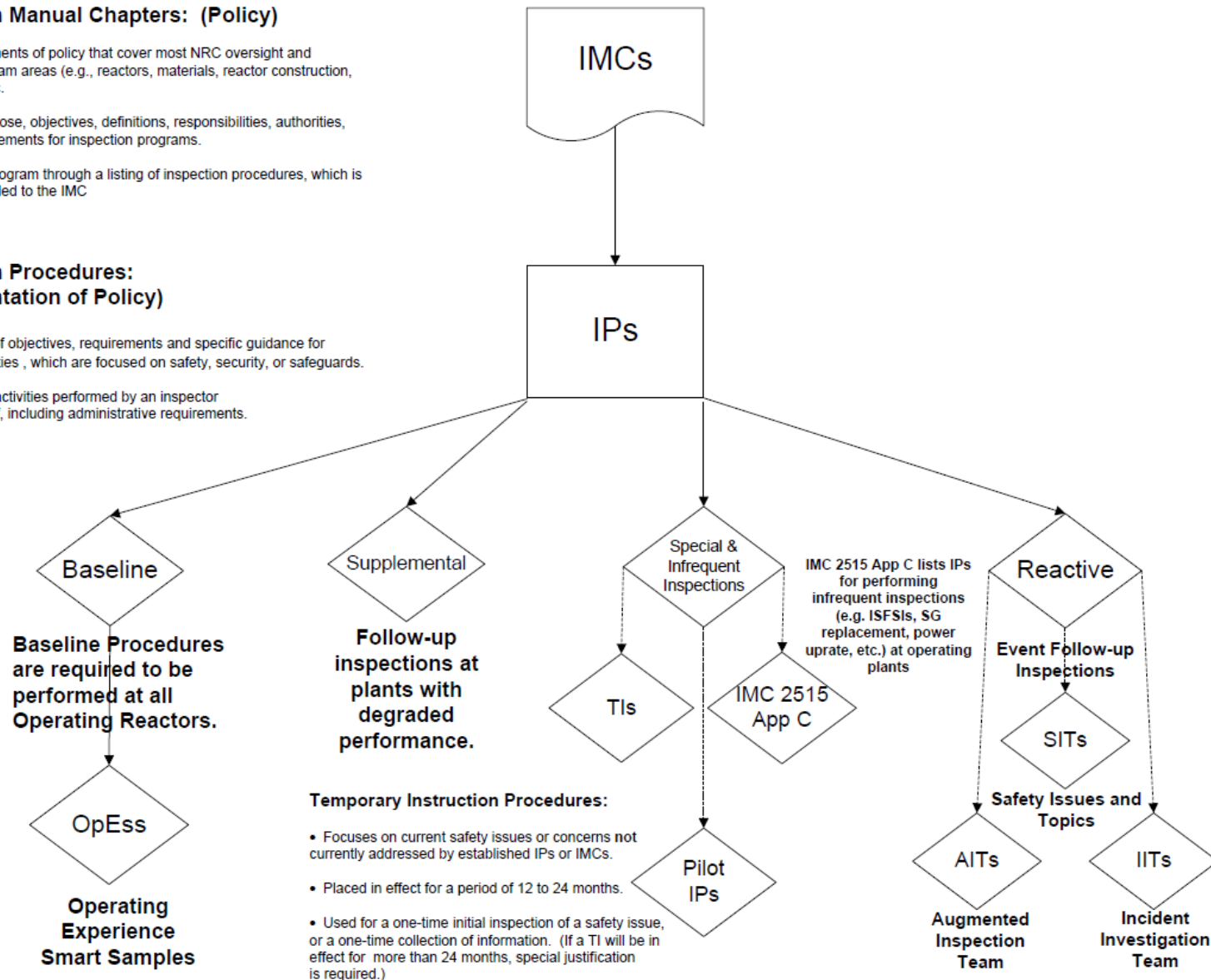


Exhibit 2: Document Issuing Forms (DIF)

An example of the NRR DIF:

NRR Document Issuing Form (DIF)

To: NRR Inspection Manual Coordinator

1. Number and Title of Document: _____
 Document ML _____ Effective Date: _____

2. Type of Document
☐ Inspection Manual Chapter (IMC) ☐ Inspection Procedure (IP)
☐ Temporary Instruction (TI)

3. Type of Action: ☐ New document ☐ Revision ☐ Deletion -- Reason _____

4. Does the new/revised document change the Baseline requirements (ROP only)? ☐
 If Yes, Complete the following tasks:
☐ Update the RPS Baseline IP Table accordingly (i.e. Samples and/or Hours)
☐ Verify any changes needed to cover letter and report templates (IMC-0612) have been implemented

5. Does the issuance of this document require the revision of IMC-0308, "Reactor Oversight Process Basis Document," or another IMC or IP? ☐ Yes ☐ No
 If Yes, list document(s) number(s) and explain: _____

6. Route the following to the NRR Inspection Manual Coordinator:
 a. A completed and signed paper copy of the document issuing form.
 b. A paper copy of the final version of the document to be issued, including color copies of any graphics or exhibits that are intended to be shown in color. The paper document should be identical to the electronic version of the document in ADAMS.
 c. A paper copy of the comment resolution summary.
 d. A completed ADAMS Document Submission Form (Form 665P) for the package that will include the final document to be issued and the comment resolution summary.
 e. List and attach any feedback forms associated with this document revision.

NOTE: When placing documents into ADAMS, ensure that the NRR Inspection Manual Coordinator has "Owner" rights to the documents.

7. Is a briefing required? ☐ Yes ☐ No
 If "yes", provide the type of briefing and date of completion: _____

8. Approval Signatures (Print and Signature/Organization)

a. Originator _____ Date _____	d. Chief, DIRS-IPAB/IRIB _____ Date _____ (new documents, revisions & deletions)
b. Originator's Supervisor _____ Date _____	e. M. King, Deputy Director, DIRS _____ Date _____ (required for new documents/major revisions only)
c. Bridget Curran _____ Date _____ NRR Insp Manual Coordinator	

[The DIFs for NMSS, NRO and NSIR can be found in ADAMS:

NMSS: ML16308A304

NRR: ML16308A237

NRO: ML16308A305

NSIR: ML16308A307]

Exhibit 3: Example of 30 Day Comment Memo

MEMORANDUM TO: Those on the Enclosed List

FROM: Insert Name Here, Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: IMC/IP XXXXX DOCUMENT FOR COMMENT MEMORANDUM
(DC 15-XXX)

Enclosed for your review and comment are documents for which changes are being proposed. The Office of Nuclear Reactor Regulation technical contacts are listed, along with a summary of changes.

To facilitate timely issuance, please comment on the specific changes being made to the document. If you wish to make other comments to improve the document, please use the feedback process described in Inspection Manual Chapter 0801, "Reactor Oversight Process Feedback Program."

Please note that in order to view the proposed revisions to the draft document(s) in MS Word, the local settings of your computer need to be set as follows: First, display the Reviewing Toolbar by View/Toolbars/check Reviewing. (The reviewing toolbar is displayed at the top left, immediately above your document, with the pull-down menus labeled, "Final Showing Markup" and "Show.") Click on Show, pull down to Options, and select the following: Insertions: Color Only/Red; Deletions: Strikethrough, Red; Changed Lines: Outside Border, Red. You also may elect to view the balloons.

IMC 2515 Appendix D, "Plant Status"

"DIRS" Document Lead: "Document Lead", NRR/"DIRS/IRIB", 301-415-XXX,
"document.lead"@nrc.gov.

This change is a significant change that only affects Attachment 1, "Reactor Coolant System (RCS) Unidentified Leakage Rate Trending," and its associated spreadsheets.

The change is a complete re-write of Attachment 1 and a restructuring of the trending spreadsheets.

Please provide your comments to the contact listed above and to (Inset name of Inspection Manual Coordinator), NRR/DIRS/IRIB; 301-415-XXXX; e-mail:
"InspectionManualCoordinator"@nrc.gov, within 30 days of the date of this memorandum.

CONTACT: (Inspection Manual Coordinator), NRR/DIRS
301-415-XXXX

Exhibit 4: Example of Comment Resolution Summary

Resolution of Comments MLxxxxxAxxx
IMC/IP XXXX (Date) MLxxxxxAxxx

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

This tabular list can be portrait or landscape format, at the Document Lead's discretion.

[Word version template: ML16333A293]

[Excel version template: ML16333A291]

Exhibit 5: Example of Revision History Page

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)
N/A	MLXXXXXXXX 3/17/06 CN XX-XXX	First issuance. Completed 4 year search for commitments and found none.	None	N/A
N/A	MLXXXXXXXX1 1/18/04 CN XX-XXX	Revised to include feedback from inspectors and also for editorial changes	None	N/A
C-1 Reference: Generic Letter (GL) 04-01	MLXXXXXXXX6 6/16/04 CN XX-XXX	Incorporated comments of GL 04-01	Web-based training for all power reactor inspectors 04/20/04	ML060905000
N/A	MLXXXXXX XX/XX/XX CN XX-XXX	Revised to change sample size and clarify inspection guidance. (ROPFFs XXXXX-1234 and XXXXX-1235)	None	MLXXXXXAXXX Closed FBF: XXXXX-XXXX MLXXXXXAXXX

[Revision History Table template: ML16333A296]

NRC INSPECTION MANUAL

ABCD

INSPECTION MANUAL CHAPTER XXXX

TITLE

Effective Date:

XXXX-01 PURPOSE

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

XXXX-02 OBJECTIVES

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

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

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

02.02 XXXXXXXXXXXXXXXXXXXX. Xxx xxxx x xxxxxxx xxxxx xxxxxxxx xxxxxxxx x xxxx xxxxxx xx
xxxx.

XXXX-03 APPLICABILITY

XXXX-04 DEFINITIONS

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

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

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

XXXX-05 RESPONSIBILITIES AND AUTHORITIES

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

05.01 Director, [Program Office]

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

05.02 Manager of Organization

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

05.04 XXXXXXXXXXXXXXXXXXXXX.

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

XXXX-06 REQUIREMENTS

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

06.01 Sections. Sections are numbered consecutively (06.01, 06.02, etc.) and titles are underlined. Further subdivisions formatted as shown below. The IMC Word format template includes the correct paragraph formatting. Therefore, automatic paragraph numbering may be used. The template is shown in this IMC. (The subdivisions that follow merely illustrate the hierarchy. Section 06.01 is not needed unless there is a section 06.02; an “a” is not needed unless there is a “b”; a “1” is not needed unless there is a “2”.)

- a. XXXXXXXX xxxxxx xxxx xxxxxxxxxx x xxxxxxx xxxxxxx xxxx xxxxx xxxxxx xxxx x
xxxxxxx x xxx xxx.

- 1. XXXXXXXX x xxx x xxxxx xxxxxxxxxx xxxx xxxxxxxxxx xxxxxxxx x xxxxxxx
xxxxx xxxx xxxx.

- (a) Xxx xxxxxx xxxx xxxxxxxxxx xxxxx xxxxx xxxxxxx xxxxxxx xxxxx
xxxxxxx xxxx xxxxxx xxx.

- (1) XXX.
Avoid this level of subordination if possible.

XXXX-07 GUIDANCE

XXXX-08 REFERENCES

END

List of Appendices: (if applicable)

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments: (if applicable)

Revision History Table (mandatory)

NRC INSPECTION MANUAL

ABCD

INSPECTION MANUAL CHAPTER XXXX APPENDIX X

(Appendices are designated A, B, etc.)
TITLE OF APPENDIX

Effective Date:

XXXXXX-01 PURPOSE

To provide certain supplementary material.

XXXXXX-02 BACKGROUND

- 02.01 An appendix often originated elsewhere. State where it originated and, if it is copyrighted material, that reproduction has been authorized.
- 02.02 The format and content may have been prescribed by a different organization than the one reproducing the document. However, follow the format of the parent IMC to the greatest extent possible.
- 02.03 The material is appended to the document because it is needed to meet the requirements of the document.

XXXXXX-03 REQUIREMENTS

- a. There are few format requirements for an appendix.
 - 1. A table or series of tables may become an appendix.
 - 2. A figure or series of figures may become an appendix.
 - 3. An outline may become an appendix.
 - 4. A report may become an appendix.
 - 5. Any combination of items 1–4, above may become one or more appendices.
- b. Besides one inch margins (1.0 inch – at both top and bottom), there are three requirements for an appendix:
 - 1. The issue date is on each page of each document in the form 02/02/04. The actual date will be entered by the NRR IM Coordinator before the document is issued. The issue date is placed on the lower left of every page, and the document number is placed on the lower right of each page.

2. Any information appended to a manual document is listed on the last page of the document as shown in Exhibit 7.
3. Newly created material could use the Word automatic paragraph numbering scheme.

XXXXX-06 GUIDANCE (if necessary)

XXXXX-07 REFERENCES

END

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments: (if applicable)

Revision History Table (mandatory)

NRC INSPECTION MANUAL

ABCD

INSPECTION MANUAL CHAPTER XXXX ATTACHMENT #

(Attachments are designated 1, 2, 3, etc.)
TITLE OF ATTACHMENT

Effective Date:

XXXXX-01 PURPOSE

To provide certain supplementary material.

XXXXX-02 BACKGROUND

- 02.01 An appendix often originated elsewhere. State where it originated and, if it is copyrighted material, that reproduction has been authorized.
- 02.02 The format and content may have been prescribed by a different organization than the one reproducing the document. However, follow the format of the parent IMC to the greatest extent possible.
- 02.03 The material is appended to the document because it is needed to meet the requirements of the document.

XXXXX-03 REQUIREMENTS

- a. There are few format requirements for an appendix.
 - 1. A table or series of tables may become an appendix.
 - 2. A figure or series of figures may become an appendix.
 - 3. An outline may become an appendix.
 - 4. A report may become an appendix.
 - 5. Any combination of items 1–4, above may become one or more appendices.
- b. Besides one inch margins (1.0 inch – at both the top and bottom), there are three requirements for an appendix:
 - 1. The issue date is on each page of each document in the form 02/02/04. The actual date will be entered by the NRR IM Coordinator before the document is issued. The issue date is placed on the lower left of every page, and the document number is placed on the lower right of each page.

2. Any information appended to a manual document is listed on the last page of the document as shown in Exhibit 7.
3. Newly created material could use the Word automatic paragraph numbering scheme.

XXXXX-06 GUIDANCE (if necessary)

XXXXX-07 REFERENCES

END

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments: (if applicable)

Revision History Table (mandatory)

NRC INSPECTION MANUAL

ABCD

INSPECTION PROCEDURE XXXXX

PROCEDURE TITLE

Effective Date:

PROGRAM APPLICABILITY: XXWW, WWYY App X, XXZZ pp Z

XXXXX-01 INSPECTION OBJECTIVE(S)

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

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

XX
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX.

1.2 XXXXXXXXXX. Other statements follow, until all objectives have been stated.

XXXXX-02 INSPECTION REQUIREMENTS

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

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

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

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

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

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

As appropriate, the requirements specify the sample size for the inspection activity, such as the number of a given type of record to be examined, and the method of inspection, such as observation, record review, and discussions with plant personnel. The section may be subdivided into two or more subdivisions:

2.1 A Requirement. This section begins with an underlined heading that defines the subject of the requirements. Succeeding sections are numbered sequentially 02.02, 02.03, etc. The IMC Word format template includes the correct paragraph formatting. Therefore, automatic paragraph numbering may be used.

- a. Further Subdivisions. The subdivisions that follow merely illustrate the breakdown. An "02.01" is not needed unless there is an "02.02;" an "a" is not needed unless there is a, "b"; and "1" is not needed unless there is a, "2," etc.
- b. The next subdivisions are lettered sequentially and any headings are underlined.
 - 1. The next level is numbered 1, 2, 3, etc.
 - (a) Avoid further levels if possible.
 - (1) This is the lowest level.

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

2.3 Baseline Inspection Procedures. Inspection requirements for cornerstone procedures of the risk-informed baseline inspection program are attached to the procedures. The Inspection Requirements section of a baseline inspection procedure lists the attachments.

2.4 It also contains any inspection requirements that apply to all of the attachments to the procedure.

XXXXX-03 INSPECTION GUIDANCE

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

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

03.01 General Guidance

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

03.02 Specific Guidance

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

XXXXX-04 RESOURCE ESTIMATE

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

XXXXX-05 PROCEDURE COMPLETION

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

XXXXX-06 REFERENCES

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

10 CFR Part 50, Appendix B, Criterion IX.

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

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

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

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

END

List of Appendices: (if applicable)XXXXX Appendix A Xxxxxxxxxx
XXXXX Appendix B Xxxxxxxxxx

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments (if applicable)
Revision History Table (mandatory)

PREPARATION OF AN INSPECTION PROCEDURE
ATTACHMENT

The "ABCD" is the
responsible branch

NRC INSPECTION MANUAL

ABCD

INSPECTION PROCEDURE XXXXX ATTACHMENT XX

INSPECTION PROCEDURE TITLE
(which is the inspectable area from IMC 0308 Attachment 02)

Effective Date:

PROGRAM APPLICABILITY: IMC 2515 A (for example)

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

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

INSPECTION BASES: See IMC 0308 Attachment 2

SAMPLE REQUIREMENTS:

Sample Requirements		Minimum Baseline Completion Sample Requirements		Budgeted Range	
Sample Type	Section	Frequency	Sample Size	Samples	Hours
Sample Name 1	03.01	Annual	1 per site	X - Z per site	57 +/-5 per site Or A – C hours per site
Sample Name 2	03.02	Annual	2 per site (1 on mitigating system)	X – Z per site	

XXXXX.YY-01 INSPECTION OBJECTIVE

01.01 Inspection Objective 1

01.02 Inspection Objective 2

XXXXX.YY-02 GENERAL GUIDANCE

High level guidance such as when it is appropriate to perform the IP, and other general considerations.

The baseline inspection program includes procedure attachments that cover the seven cornerstones of safety, including security, in the reactor oversight process (one reactor safety procedure covers three cornerstones).

The inspection requirements of the baseline inspection program are in separate baseline inspection procedure attachments. These procedure attachments are stand-alone documents that correspond to inspectable areas that have been risk informed and work with performance indicators to provide a minimum level of oversight to maintain power plant safety and security.

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

2.2 Sample Sizes. Baseline inspection procedures must explicitly define the amount of inspection. If necessary, the sample sizes specified in the attachment are adjusted for the number of reactor units at a site to obtain sufficient performance information for multi-unit sites. The sample sizes allow for some deviation (See IMC 2515 for more information).

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

XXXXX.YY-03 INSPECTION SAMPLES

03.01 Sample Name 1

a. Sample 1 Requirement 1

Specific Guidance:

1. Specific Guidance 1 Requirement 1

2. Specific Guidance 2 Requirement 1

b. Sample 1 Requirement 2

Specific Guidance:

1. Specific Guidance 1 Requirement 2

2. Specific Guidance 2 Requirement 2

03.02 Sample Name 2

a. Sample 2 Requirement 1

Specific Guidance:

1. Specific Guidance 1 Requirement 1
2. Specific Guidance 2 Requirement 1
- b. Sample 2 Requirement 2

Specific Guidance:

1. Specific Guidance 1 Requirement 2
2. Specific Guidance 2 Requirement 2

XXXXX.YY-04 REFERENCES

List all other inspection manual documents (IMCs, IPs, and TIs) that appear in the document, when applicable. For NRC documents where the ADAMS accession number (e.g., ML003717333) is included, it should be listed last. Regulatory guides and industry standards and codes do not need an ADAMS accession number. References and links to web pages must be public, unless specifically identified as non-public.

END

List of Appendices (if applicable)

XXXXXXXXXX

XXXXXXXXXX

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments (if applicable)

Revision History Table (mandatory)

NRC INSPECTION MANUAL

ABCD

TEMPORARY INSTRUCTION XXXX

TEMPORARY INSTRUCTION TITLE

Effective Date:

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

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

XXXX/XXX-01 OBJECTIVE

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

01.01 Subdivisions have this format:

- a. XXXXXXXXXXXXXXXXXXXXXXXX.
- b. XXXXXXXXXXXXXXXXXXXXXXXX.
 - 1. If further subdivisions are needed, 1, 2, 3, etc., follow.
 - 2. XXXXXXXXXXXXXXXXXXXXXXXX.
 - (a) This level is rarely needed.
 - (b) XXXXXXXXXXXXXXXX.

01.02 XXXXXXXXXXXXXXXXXXXXXXXX.

XXXX/XXX-02 BACKGROUND

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

XXXX/XXX-03 INSPECTION REQUIREMENTS

Succeeding subdivisions (04.01, 04.02, etc.) are used to define and explain the requirements of the function or program. Numbering and paragraphing are the same as for a manual chapter. See Exhibit 6, Inspection Manual Chapter XXXX, Section 06.

XXXX/XXX-04 INSPECTION GUIDANCE

XXXX/XXX-05 REPORTING REQUIREMENTS

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

XXXX/XXX-06 COMPLETION SCHEDULE

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

XXXX/XXX-07 EXPIRATION

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

XXXX/XXX-08 CONTACT(S)

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

XXXX/XXX-09 STATISTICAL DATA REPORTING

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

XXXX/XXX-10 RESOURCE ESTIMATE

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

XXXX/XXX-11 TRAINING.

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

XXXX/XXX-12 REFERENCES

The guidance for this section is found in Exhibit 7 of this manual chapter.

END

List of Appendices (if applicable)

XXXXXXXXXX

XXXXXXXXXX

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments (if applicable)

Revision History Table (mandatory)

Exhibit 7: Example of a Reference List
(may include some of these documents, but not necessarily all)

IMC 2515, "Light-Water Reactor Inspection Program—Operations Phase"

IMC 0308 Attachment 2, "Technical Basis for Inspection Program"

IMC 0308 Attachment 3, Appendix A, "Technical Basis for the At-Power Significance Determination Process (SDP)"

IMC 0609 Appendix F, Attachment 1, "Attachment 1: Fire Protection Significance Determination Process Worksheet"

IMC 0612 Exhibit 1, "Standard Reactor Inspection Report Outline"

IMC 2600 Appendix A, "Guidance for Conducting Fuel Cycle Inspections"

IP 71111, "Reactor Safety-Initiating Events, Mitigating Systems, Barrier Integrity"

IP 71111.01, "Adverse Weather Protection"

[NUREG-1379, "NRC Editorial Style Guide"](#)

MD 8.13, "Reactor Oversight Process"

NRC Regulatory Issue Summary 2000-15, "Recommendations for Ensuring Continued Safe Plant Operation and Minimizing Requests for Enforcement Discretion during Extreme Weather Conditions"

NRC Incident Response Supplement 2650-2652, "Hurricane / Severe Weather / Natural Phenomenon Event Response"

NRC IE Bulletin 79-24, "Frozen Lines"

Licensee report to NRC Regional Administrator in response to NRC IE Bulletin 79-24

IEEE 622-1979, "Recommended Practice for the Design and Installation of Electric Pipe Heating Systems for Nuclear Power Generating Plants"

Letter from Eric J. Leeds (NRC) to Joseph E. Pollock (NEI), Subject: "Electric Power Research Institute Final Draft Report XXXXXX, 'Seismic Evaluation Guidance: Augmented Approach for the Resolution Of Fukushima Near-Term Task Force Recommendation 2.1: Seismic,' as an Acceptable Alternative to the March 12, 2012, Information Request for Seismic Reevaluations," dated May 7, 2013 (ADAMS accession No. ML13106A331)

NRC Generic Letter 2006-02, "Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power"

ASTM Standard D-975, "Standard Specification for Diesel Fuel Oils."

NRC INSPECTION MANUAL

IRIB

Change Notice YY-XXX

DELETED:		TRANSMITTED:	
<u>Number</u>	<u>Date</u>	<u>Number</u>	<u>Date</u>
1. IMC XXXX	01/01/81	IMC XXXX	01/01/95
2.		IP XXXXX	01/01/95
3. TI XXXX/XXX	03/02/81		

TRAINING REQUIRED: Use one of the following statements as appropriate.

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

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

REMARKS: (This section summarizes the documents being issued, revised or deleted. The NRR IM Coordinator uses the text from the revision history table, "Description of Change," column to describe the new document, the revisions to an existing document, or, in the case of a document deletion, summarizes the reason for the deletion that was provided on the DIF.)

IMC XXXX, "Insert Title Here," has been revised to...

IP XXXXX, "Insert Title Here," is a new document that has been created to....
Researched commitments for the last four years and found _____.

TI XXXX/XXX, "Insert Title Here," has been completed and is now deleted from the inspection program. The TI completion report can be found in ADAMS under MLxxxxxAxxx.

DISTRIBUTION:

- ☐ Standard
☐ Official Use Only (OUO)-Security Related Information.

Please contact: _____ Phone: _____

END

[Change Notice Template: ML16334A035]

Exhibit 9: Format Requirements Checklist

Note: Refer to Exhibit 10 for instructions on how to format using MS Word.

Body of document:

- 11-point Arial font
- Justification set to left

Margins for all pages:

- Top margin at 1.0"
- Bottom margin at 1.0"
- Left and right margins at 1.0"

Headers: Spacing: Before and After set to 0 pts, Line Spacing set to Single

- Set at 1.0" (Based on MD 3.57 formatting requirements. When OEDO Procedure 0357 is issued, tentatively in December 2016, the headers will be set to 0.5")
- 11 point Arial font

Footers: Spacing: Before and After set to 0 pts, Line Spacing set to Single

- Set at 1.0" (Based on MD 3.57 formatting requirements. When OEDO Procedure 0357 is issued, tentatively in December 2016, the footers will be set to 0.5")
- Issue Date: XX/XX/XX' against left margin
- Page number in center
- Document Number against right margin
- 11-point Arial font

Tab settings for 1st line (NRC Inspection Manual in center and Originating Organization code at right):

- 3.25" Center Tab
- 6.5" Right Tab

Tab settings for body of document:

- Relative to left margin: 0.19", 0.56", 1.00", 1.44", 1.88", 2.25", 2.69", 3.13", 3.50", 3.94", 4.38", 5.19", 5.63", 6.06"
- Default tab stops: 0.42"

Tab settings for footer:

- Portrait format:
 - 3.25" Center Tab
 - 6.5" Right Tab
- Landscape format;
 - 4.5" Center Tab
 - 9" Right Tab

Page numbers:

- When there is a table of contents within the document itself, do not number the title page before it.

Number the table of contents page(s) with lower-case Roman numerals (i, ii, iii).
Number the body of the document with Arabic numerals (1, 2, 3).

Number each new section following the body with its own prefix (e.g., E1 for Exhibit 1, Att1 for Attachment 1), followed by a hyphen, and then an Arabic numeral. Begin renumbering with page 1 for each new section (E1-1, Att1-1).

Official Use Only Document Headers/ Footers: (for SENSITIVE, Non-Public documents)
Follow the SUNSI guidance and place the required wording (e.g., "Official Use Only") centered in the headers and footers of all applicable pages.

Page one requirements:

Line 1: NRC Inspection Manual in all CAPS in bold Arial 19-point font, centered; and
originating organization code in Arial 10-point font, against the right margin.

Line 1 **NRC INSPECTION MANUAL** IRIB

Line 2: Blank

Line 3: Document title in all CAPS in Arial 11-point font, centered with horizontal line above
and below document title.

Line 3 INSPECTION MANUAL CHAPTER 0040

Lines 4 and 5: Blank

Line 6: Document Name in all CAPS in Arial 11-point font, centered.

Line 6 PREPARING, REVISING, AND ISSUING DOCUMENTS
FOR THE NRC INSPECTION MANUAL

Effective Date:

Supporting Information for Inspection Manual Documents:

For the Table of Contents (both standalone and within a document), Appendices,
Attachments, Exhibits, Figures and Tables

11-point Arial font (unless otherwise stated)

Margins: Top, Bottom, Left and Right set to 1.0"

Exhibit 10: Guidance for Using MS Word 2013

Horizontal lines above and below title:

Type three dashes in a row without spaces (---) and press the Enter key.

Margins:

Page Layout tab, click on Page Setup. Enter margins (see Exhibit 6).

Page Numbering:

Create a new section each time the page numbering or formatting changes. New sections will be created for the title page, table of contents (within a document), main body, and each attachment. To create a section break, from the **Page Layout** tab, click on Breaks and under Section Breaks, click next page.

Indents and Spacing (in Paragraph Settings)

Home tab, click on Paragraph (box below appears). Click on Tabs (bottom left) and enter the list of settings from Exhibit 6 for tab settings for body of document.

Adjust tabs while working on the document by highlighting text to be formatted, clicking on Paragraph, and entering:

General:

Alignment = Left

Indentation:

Left Indentation

- a, b, c = 0.19" Hanging by 0.37"
- 1,2,3 = 0.56" Hanging by 0.44"
- (1), (2), (3) = 1.00" Hanging by 0.44"
- (a),(b),(c) = 1.44" Hanging by 0.44"

Right indentation = 0"

Spacing:

Before and After = 0 pt

Line spacing = Single

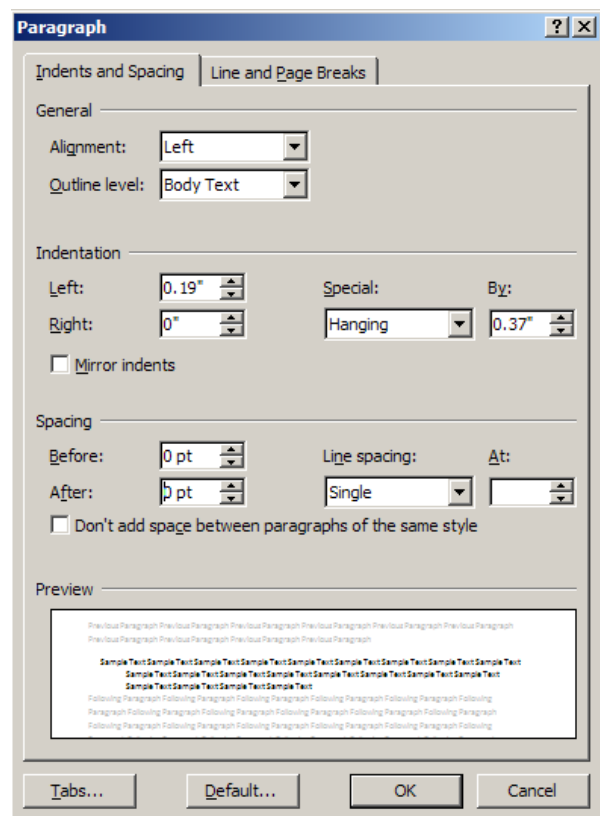


Figure 1: Example of paragraph formatting

Note: The correct format can be copied from one section to another by highlighting text from the section you want copied, clicking on the Format Paint (brush icon), and highlighting the section to which you want the format copied.

Footers:

Insert tab, select Footer and pull down to 'Blank (Three Columns).'

For left footer, type: Issue Date: XX/XX/XX

For right footer, type: number of document

For center footer, click Insert tab, click on Page Number, (if applicable enter any prefix to the number), and select Plain Number

To make changes from one footer section to the next, open the Header/Footer toolbar by double-clicking in the footer. Click on 'Link to Previous,' to remove the link from the previous footer. (This is a toggle switch.)

Table of Contents (within the document itself):

Entries in the table of contents will follow the format in the body of the document itself and shall list titles and page numbers of the document. Do not use bold, as it is not in the body of the document, but underline is acceptable for the subsections. **The one exception to this is the sample requirements in the baseline inspection procedure.**

First mark the items you want displayed in the Table of Contents:

1. Highlight the text and hold down the keys ALT + SHIFT + the letter O.
2. In the box that appears, select the Level Numbers
 - Sections (0040-01) = Level 1
 - Subsections (01.01) = Level 2
 - Add additional levels if appropriate

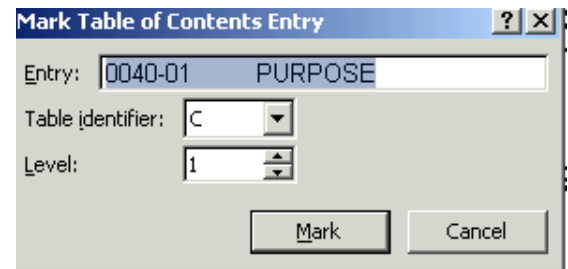


Figure 2: Mark Table of Contents Entry
Box that appears after entering
ALT + SHIFT+ O

After all items are marked, display the Table of Contents.

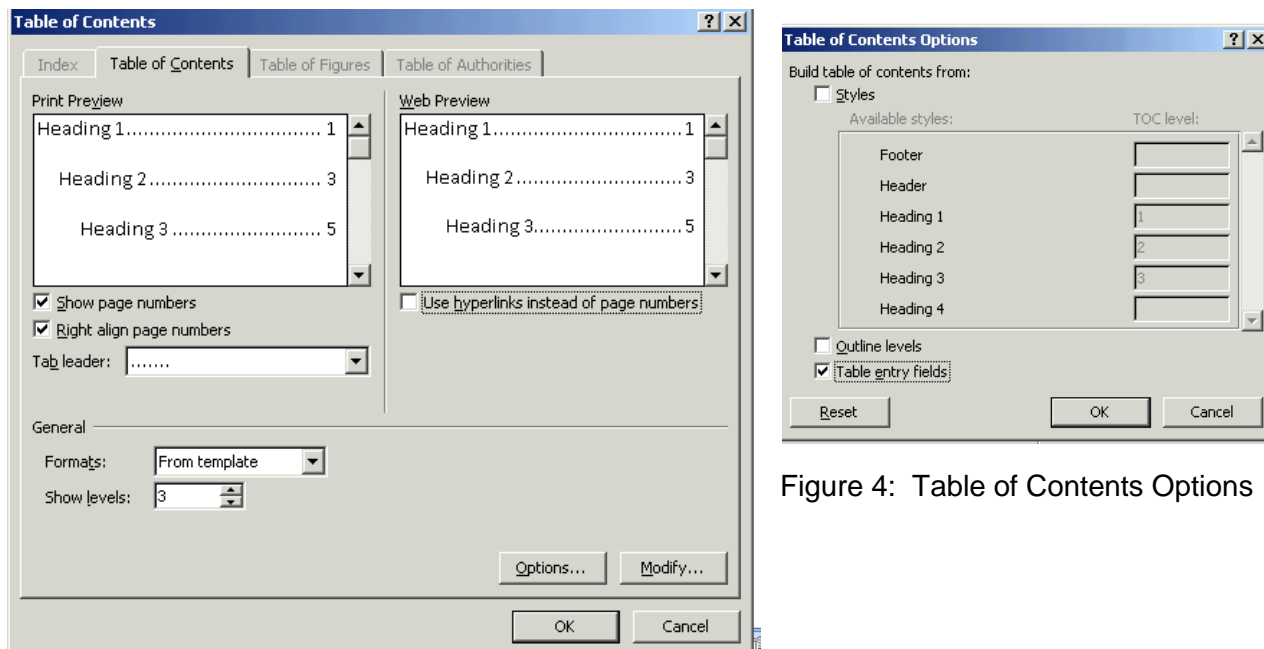


Figure 3: Table of Contents

Figure 4: Table of Contents Options

3. Click on the place where you want the table of contents inserted. On the **References** tab, select "Table of Contents". Pull down to "Insert Table of Contents" (see image below at left). Uncheck "Use hyperlinks instead of page numbers" and click on Options. (This brings up the image at right).
4. Uncheck the "Styles" and "Outline levels," check "Table entry fields," and click "OK" twice to generate the table of contents.
5. After the table of contents is displayed:
 - a. For entries after the main body, such as an appendix, attachment, or exhibit, type in the prefix before the 1 (for example: AppA-1, Att1-1, Exh1-1)
 - b. Remove any underlining by highlighting the text and clicking on the underline button.
6. After making changes to the text, re-generate the table of contents by depressing the F9 key.

Set the Track Changes Options to display red font and lines for changes:

For final drafts of documents to be issued:

In the Review tab, under Tracking, select Final Showing Markup, and then click on Track Changes/Change Tracking Options and set as follows

Markup Insertions = Color only
 Color = Red
Deletions = None
 Color = Red
Formatting = None,
 Color = Red
Changed Lines = Outside Border
 Color = Red

Moves Uncheck Track Moves

Formatting Uncheck Track formatting, none,
 color Red

For documents sent out for comment:
Same as above except Deletions = Strikethrough

Balloons only for comments/formatting

View the entire document to display balloons.
Remove all balloons before submitting document
to be issued by right clicking on each balloon and
accepting the changes.

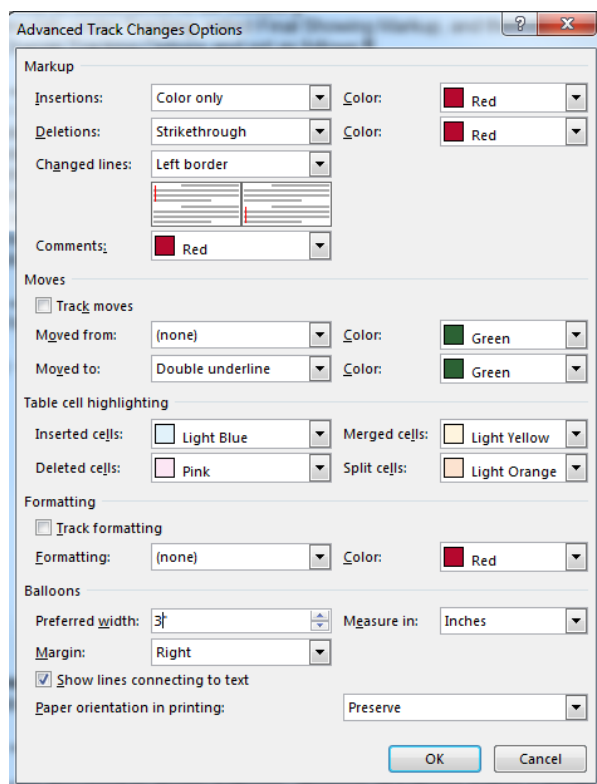


Figure 5: Advanced Track Changes Options

Attachment 1: Revision History for IMC 0040

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)
	10/14/88 CN 88-015	Initial issuance.		
	09/17/90 CN 90-010	Is revised to: 1) simplify manual chapter content to make it easier for users to prepare documents, 2) delete obsolete or rarely used instructions and materials, 3) upgrade the exhibits to reflect the current NRC format, and 4) revise the format to include SIMS information for entry of verification completion and inspection report information in the sims database.		
	08/30/91 CN 91-011	Is revised to reflect training requirements that are commensurate with the current inspection program. The revisions are the results of a working group review that consisted of personnel from the Regions, NRR, NMSS, and TTC. Appendix B qualification journals to IMC 0040 is being revised and is not included with this revision. It will be issued at a later date.		
	09/27/95 CN 95-013	Is revised to reflect the preparation of documents using WordPerfect, organization changes that have occurred since 8/91, to require closeout reports for temporary instructions, and to reflect the current policy being used for the issuance of inspection program documents.		

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	08/16/01 CN 01-015	Is revised to make it consistent with the revised Reactor Oversight Process. Major addition is a process for determining if changes to the baseline inspection program are necessary. Other changes are to format the font face to be compatible with the Agency computer resources. The requirements of IMC 0045 were also added to the manual chapter.		
	02/21/03 CN 03-006	Is revised to add steps to ensure the ROP Basis Document is updated by inputs from program Document Leads at the time program documents are changed and approved.		
C1 Reference: Davis-Besse Lessons Learned Task Force Item 3.1.2(3) and Problem Identification Form 2005- 008	ML040690209 02/02/04 CN 04-003	Is revised to ensure that revisions of inspection procedures do not inadvertently delete inspection requirements that were added as a result of an event or occurrence that had generic applicability.	None	N/A
N/A	ML053210382 11/28/05 CN 05-031	Complete rewrite of document structure, add requirement for revision history page, minor revision to DIF. Completed 4 year historical CN search	None	ML053210329

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N/A	ML063260070 03/05/07 CN 07-008	This document is being revised to update and clarify the processes that will be used to prepare, revise, and issue Manual documents, including processes used by the various NRC offices that conduct inspection.	None	ML070570542
N/A	ML071580744 06/20/07 CN 07-020	This document has been revised to establish deadlines for submission of Manual documents in WordPerfect and MS Word formats; update the Office of New Reactors' document issuing form, pursuant to Feedback Form 0040-1144; and provide greater clarity and incorporate editorial changes in response to Feedback Form 0040-1128. It also serves as a template for a Manual document in MS Word.	None	ML071580749 Closed FBF: 0040-1144 0040-1128
N/A	ML082240426 08/19/08 CN 08-024	The document has been revised to clarify instructions on the use of Microsoft (MS) Word in preparing inspection manual documents, reflect office-related requests to modify document issuing forms, respond to Feedback Forms, and make editorial improvements.	None	ML082240428 Closed FBF: n/a

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N/A	ML082820151 10/29/09 CN 09-025	Relocates program office document issuing forms from IMC 0040 to the NRR Digital City website. Adds a document issuing form for NSIR. Clarifies authorization requirements for documents affecting multiple program offices. Stipulates that no new technical guidance or 10 CFR guidance documents will be issued and that these documents will be relocated in the future to either an IMC, IP or different program for ease of use.	None	ML092170189 Closed FBF: n/a
N/A	ML11053A009 06/02/11 CN 11-009	Improved the process: (1) all documents to have a references section which includes a list of other IPs, IMCs, or TIs that appear in the document (ROPFF 0040- 1354). (2) the document's ML number to be listed on the revision history page. (3) comment resolution summary to be an official non-public record prior to submittal to NRR. (4) For new IPs and TIs, the requirements and guidance sections are to be combined (ROPFF 0040-1645). (5) Clarified organizational responsibilities. (6) Upgraded guidance on MS Word to version 2007. (7) Made editorial improvements.	None	ML11125A085 Closed FBF: 0040-1354 ML11174A197 0040-1645 ML11174A193
N/A	ML11242A062 11/16/11 CN 11-035	Included guidance on the formatting of an Operating Experience Smart Sample. Change coordinated with development of IMC 2523, "NRC Application of Operating Experience."	None	N/A
N/A	ML12045A397 04/12/12 CN 12-005	Revised to support re-alignment with Agency documentation standards.	None	N/A

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	ML12345A262 12/10/12 CN 12-028	Revised to support minor edits, address FBF 0040-1769, and add a flowchart.	None	ML12332A148 FBF 0040-1769 ML12332A148
	ML13176A014 08/08/2013 CN 13-016	Revised to change signature authority from DIRS Deputy Director for all change notices to only those changes that are new documents or policy changes, and allow the IPAB/IRIB Branch Chief signature authority for revisions and deletions. Add the links for the DIFs in Exhibit 2, and new guidance for temporary instruction requests.	None	ML12103A174
	ML14147A186 11/20/14 CN 14-028	Revised to provide more clarity for writing new manual chapters, inspection procedures and temporary instructions. Added signature authority for the Division or Deputy Division Director for major and policy changes, as well as issuing a new document. Included verbiage for a "Pilot" IP, which should be included in the "Special and Infrequent" inspections.	None	ML14323A008
	ML16273A037 12/19/16 CN 16-034	Addressed recommendations from OIG Audit 16-A-12 to include more clear direction when writing or revising IMCs, IPs or TIs. Added verbiage regarding appendices, attachments, exhibits, etc. Added examples of front pages for IMCs, IPs, and TIs, Comment Resolution tables, Regional Comment memos and Change Notices. Updated direction on how to use MS Word 2013.	None	ML16273A035
	ML18003A122 01/15/18 CN 18-001	Editorial revision to include the new version of baseline inspection procedure formatting, based on the IP streamlining effort.	None	n/a