NRC INSPECTION MANUAL

INSPECTION MANUAL CHAPTER 0611 APPENDIX C

DOCUMENTING SUPPLEMENTAL INSPECTIONS

Effective Date: 01/01/2021

0611C-01 PURPOSE

Convey additional requirements and content for preparing power reactor supplemental inspection reports.

0611C-02 OBJECTIVE

02.01 Communicate to an independent informed reader how the licensee met or failed to meet the supplemental inspection procedure objectives.

02.02 Communicate to an independent informed reader the NRC's assessment of licensee performance and *any additional actions or follow-up inspection activities* [C1].

0611C-03 APPLICABILITY

Refer to Inspection Manual Chapter (IMC) 0611, "Power Reactor Inspection Reports."

0611C-04 DEFINITIONS

Refer to IMC 2515 Appendix B, "Supplemental Inspection Program."

0611C-05 RESPONSIBILITIES AND AUTHORITIES

Refer to IMC 0611.

0611C-06 DOCUMENTATION

06.01 Supplemental inspection documentation, in addition to conforming to other IMC 0611 documentation requirements:

- a. must record, for each inspection requirement, the NRC assessment of the adequacy of the licensee problem identification and resolution process implementation in addressing and preventing recurrence of a greater-than-green performance issue; and
- b. must record necessary information for the NRC to efficiently and effectively schedule and conduct follow-up baseline inspection to verify prompt effective completion of planned corrective actions to prevent recurrence (CAPRs) of the greater-than-green performance issue(s) that were planned and/or could not be inspected prior to the conclusion of the supplemental inspection. [C1]

06.02 Inspection report detail may, in part, depend on whether the licensee has adequately described the associated issue(s), CAPRs, tracking, and completion records in a quality assurance record-keeping process in accordance with 10 CFR 50 Appendix B. In cases where the assurance of record revision control, history, status, and retention is suspect and involves information that would be required to effectively follow-up and inspect CAPRs, the report will

need to capture this information that might otherwise just be referenced.

06.03 Use the terminology defined in IMC 2515 Appendix B when describing and assessing licensee performance.

06.04 Refer to IMC 0611 Exhibit 4, "Cover Letter Templates," for cover letter development. Include any enforcement action (EA) number associated with the performance issue being inspected.

06.05 Use the following supplemental inspection report templates to inform report organization and content.

- IP 95001: <u>ML20016A250</u> (non-public)
- IP 95002: <u>ML20022A271</u> (non-public)
- IP 95003: <u>ML20038A370</u> (non-public placeholder not yet developed)

Use Table 13, as described in IMC 0611 and as illustrated in the above templates, to document the NRC assessment and determinations. Some cutting and pasting of template content into the Reactor Program Systems (RPS) report generator may be necessary to efficiently create the report. Commitment C1 above is met in part by following the template outline, which identifies each CAPR, and including the planned completion date for those CAPRs which have not been completed.

06.06 When documenting one or more planned CAPRs in the report, "Add a non-result item" in RPS to track the follow-up inspection activity as follows:

- a. Title each tracking item "CAPR" followed by the report number, report section, and a short description (e.g., CAPR 2020040 3a(2)(a) – Replace Auxiliary Feedwater Pump Bearings).
- b. Cut and paste the appropriate section of the report into the RPS "Description" field.
- c. Under the "Tracking Data" enter the planned licensee completion date for the planned CAPR in the "Projected Closeout Date" field.

06.07 Consider documenting the regulatory performance meeting described in IMC 0305, "Operating Reactor Assessment Program," with the exit meeting summary, when appropriate.

06.08 The signature authority for supplemental inspection reports is as follows:

- a. For an inspection performed in accordance with inspection procedure (IP) 95001/95002 that resulted in the closure of the performance issue with no greater than green findings or greater than severity level IV violations, the responsible branch chief should sign out the report.
- b. For an inspection performed in accordance with IP 95001/95002 that resulted in holding open the performance issue, greater than green findings, or greater than severity level IV violations, the responsible division director should sign out the report.

c. For an inspection performed in accordance with IP 95003, the regional administrator should sign out the report.

0611C-07 REFERENCES

- IMC 0305, "Operating Reactor Assessment Program"
- IMC 0611, "Power Reactor Inspection Reports"

IMC 0611 Exhibit 4, "Cover Letter Templates"

IMC 2515 Appendix B, "Supplemental Inspection Program"

IP 95001, "Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs"

IP 95002, "Supplemental Inspection Response to Action Matrix Column 3 Inputs"

IP 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs or One Red Input"

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	ML031610693 06/24/03 CN 03-021	Initial Issue	None	
N/A	ML083040427 02/02/09 CN 09-004	This appendix did not have a revision history table prior to this revision. This revision incorporates an example supplemental inspection report and updates the previous documentation guidance. This revision also closes ROP Feedback Forms 95001-849 and 0612C-1154.	None	<u>ML083530785</u>
N/A	ML092540495 10/28/11 CN 11-024	Relocated cover letter guidance to IMC 0612 Exhibit 4 and sample inspection report to IMC 0612 Appendix C Exhibit 1.	None	<u>ML111880173</u>
	ML17129A625 12/13/17 CN 17-029	Editorial update made to reflect the splitting IMC 0612 into IMC 0611 for documentation and IMC 0612 for issue screening.	None	
C1	ML20016A268 10/21/20 CN 20-054	Major revision to align with IMC 0040 formatting standards. Added direction to document and track in Reactor Program Systems planned corrective actions to prevent recurrence to allow for efficient follow-up inspection. This addresses OIG-19- A-19 Report Recommendation 1 and part of Recommendation 2 (ML19256A776) [C1]. Organizational related content was relocated to Reactor Program Systems Auto Report Generator and report templates.	None	<u>ML20155K861</u>

Attachment 1 - Revision History for IMC 0611 Appendix C