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## Office Letter Transmittal

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**TO:** All NRR Employees

**SUBJECT:** NRR OFFICE LETTER NO. 1102, "PROCEDURES FOR TRACKING INSPECTION REPORTS FOR INSPECTIONS CONDUCTED BY NRR HEADQUARTERS STAFF"

**PURPOSE:** The procedures in this office letter contain instructions for obtaining inspection report numbers for inspections conducted by Office of Nuclear Reactor Regulation (NRR) staff. The scope includes using the inspection report number for tracking staff hours and/or contractual costs associated with NRR inspections, and for recording the timeliness for issuing inspection reports.

**DIVISION OF ORIGIN:** Division of Inspection and Support Programs

**CONTACT:** Beverly Jones, (301) 415-1236

**DATE APPROVED:** September 24, 1996

**AVAILABILITY:** Roberta Ingram, (301) 415-1219

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## ***NRR OFFICE LETTER NO. 1102***

### ***PROCEDURES FOR TRACKING INSPECTION REPORTS FOR INSPECTIONS CONDUCTED BY NRR HEADQUARTERS STAFF***

#### **POLICY**

This office letter primarily supports the requirements established by Public Law 101-508 that NRC assess fees to recover funds appropriated by Congress for each fiscal year. The assessment of inspection fees is described in Part 170 of Title 10 of the Code of Federal Regulations (CFR). It states, in part, "Fees for all routine and non-routine inspections will be assessed on a per inspection basis, and will be billed quarterly if they are based on full cost recovery." In addition, data requested in this office letter can be used to support the general timeliness for issuing inspection reports as described in Inspection Manual Chapter (IMC) 0610, "Inspection Reports." IMC 0610 states, "The goal for issuing inspection reports is 21 calendar days after inspection completion (30 calendar days for integrated reports and major team inspections). Although this goal may not be met in all cases, the report should be issued no later than 30 calendar days after inspection completion (45 calendar days for integrated reports and major team inspections)."

#### **BACKGROUND**

In order to present the appropriate information about inspection fee billing to the Office of the Controller (OC), each NRC office conducting inspections is required to utilize the Inspection Report Tracking System (IRTS). IRTS is a subsystem of the Regulatory Information Tracking System (RITS), used to initiate, record, and close out inspection reports for each NRC inspection performed. IRTS is the official agency-wide system used to bill completed NRC inspections that are full cost fee recoverable. IRTS data may be used to determine the timeliness for issuing an inspection report. The data are also used to determine the number of inspections performed for purposes of budget development and managing resources. IRTS data are used to validate manpower expenditures and contractual costs associated with each inspection.

Staff will be required to insert the associated docket number and inspection report number on both the NRC Form 279, "Travel Authorization," and the NRC Form 64, "Travel Voucher Schedule of Expenses and Amount Claimed." It is anticipated that as NRR integrates its inspection-related management information systems, there will be an even greater demand for the type of data that resides in IRTS today.

#### **DEFINITIONS**

An inspection is the examination, review, or assessment of any program or activity of a licensee or vendor to determine the effectiveness of the program or activity, to ensure that the health and safety of the public and plant personnel are adequately protected, to ensure that the facility is operated

safely, and to determine compliance with any applicable rule, order, regulation, or license condition pursuant to the Atomic Energy Act, the Energy Reorganization Act, the National Environmental Policy Act, or other statutory requirements. Such examinations, reviews, or assessments include, but are not limited to, routine inspections, regional initiatives, and customized, special, and augmented inspection team (AIT) inspections.

Inspections conducted by NRR staff require the establishment of an inspection report number in IRTS in accordance with the procedures described herein.

### RESPONSIBILITIES AND AUTHORITIES

#### All Supervisors

- (1) Ensure the timely and accurate documentation of inspections in IRTS by the staff they supervise.
- (2) Ensure that their staff adheres to requirements and procedures contained in this office letter.
- (3) Ensure that the data required in this office letter are submitted in a timely and accurate manner.
- (4) Take prompt corrective action to resolve any identified problems.

#### Lead Inspectors

- (1) Obtain an inspection report number from the Information Management Branch, Division of Inspection and Support Programs. The procedure for requesting a new inspection report number for an NRR-led inspection is given in Attachment 1. The Lead Inspector obtains the inspection report number before charging staff hours in the Workload Information and Scheduling Program (WISP) system or before requesting contractual support for the inspection.
- (2) Once the inspection report number is obtained, provide the NRC docket number and inspection report number to staff participating in the inspection.
- (3) When preparing a statement of work or establishing a new task for contractual support, ensure that the docket number and inspection report number are identified in the tasking for purposes of tracking contractual costs incurred for the inspection. Contractual costs will be charged to the licensee on a per inspection basis as described in 10 CFR Part 170 and in a format similar to that described in Management Directive (MD) 11.7, "NRC Procedures for Placement and Monitoring of Work With the Department of Energy," Exhibit 12, "Monthly Letter Status Report Requirements." These costs appear in the monthly letter status reports supplied by the contractor to the NRC that list, in detail, costs incurred for each inspection.

Although statements of work prepared for commercial contracts are not governed by the requirements in MD 11.7, ensuring that the contractor reports monthly expenditures in a format similar to Exhibit 12 of MD 11.7, by docket number and inspection report number, will assist the agency in identifying cost for reimbursement in accordance with 10 CFR Part 170 on a per inspection basis.

- (4) Update the three key milestones on the Inspection Report Tracking System Status Report: (a) when the inspection is complete<sup>1</sup>, (b) when the inspection report is issued<sup>2</sup>, and (c) when all activities associated with that inspection are completed<sup>3</sup>.

#### All Staff Participating in Inspections

- (1) For each inspection, enter in WISP on a weekly basis all hours expended for the preparation, documentation, travel, and direct inspection effort.
- (2) Staff accompanying an inspector on a site visit or visiting the site for training purposes, but not participating in the inspection should not charge its hours to an inspection report number, but to the appropriate TAC number established in the WISP. Only professional staff directly involved in the inspection, i.e., inspectors, technical reviewers, project managers, and section chiefs, should charge time to the docket/inspection report number combination. Management and support staff, such as secretaries, licensing assistants, administrative staff, interns or professional direct staff in training, branch chiefs, division directors, deputy division directors, associate directors, and the Office Director, should not charge time directly to an inspection.
- (3) When preparing or receiving a request for technical assistance appropriately related to an inspection, list the docket number and inspection report number for staff hour charges.
- (4) All NRR staff who are participating in an inspection, including assisted inspections for other NRC organizations, must record the docket number and inspection report number on NRC Form 279, block 25 of the Travel

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<sup>1</sup>Note: Inspection completion is normally defined as the day of the exit meeting. For resident inspectors and integrated inspection reports, inspection completion is normally defined as the last day covered by the inspection report.

<sup>2</sup>Note: OC considers the transmittal date of the inspection report the closure date for billing for completed inspections.

<sup>3</sup>Note: This milestone is recorded by the status code "C" or "X" in IRTS that indicates completion of all efforts relating to the inspection, i.e., response letters, enforcement issues, and any other outstanding effort are complete and there are no additional resource expenditures relating to the inspection. This does not include followup effort that will be addressed in future inspections.

Authorization. In addition, the docket number and inspection report number must be recorded on the NRC Form 64, "Travel Voucher."

Information Management Branch, DISP

- (1) Ensure that all requests for inspection report numbers are processed in a timely manner.
- (2) Ensure that the appropriate information is entered into the Inspection Report Tracking System in a timely manner.
- (3) Monthly, distribute the IRTS Status Report to the Lead Inspectors, their immediate supervisors, and Branch Chiefs for review.
- (4) Quarterly, confirm that IRTS reflects the status of all inspections for that quarter by ensuring that all inspection reports issued for the quarterly billing cycle are listed in IRTS.

BASIC REQUIREMENTS

Basic requirements for initiating, updating, and closing out inspection records in IRTS are contained in Attachment 1.

EFFECTIVE DATE

This office letter is effective immediately.

REFERENCES

- (1) Title 10 of the Code of Federal Regulations, Part 170, "Fees for Facilities, Materials, Import and Export Licenses, and Other Regulatory Services Under the Atomic Energy Act of 1954, as Amended"
- (2) Exhibit 12, "Monthly Letter Status Report Requirements," of NRC Management Directive 11.7, "NRC Procedures for Placement and Monitoring of Work With the Department of Energy"

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## **INSPECTION REPORT TRACKING SYSTEM BASIC REQUIREMENTS**

### PROCESS

- (1) The Lead Inspector should request a new inspection report number by sending an electronic mail message to the e-mail address: IRTS. The e-mail message must contain the docket number, the name of the Lead Inspector, and the Lead Inspector's RITS initials.
- (2) The Information Management Branch, DISP, will send an e-mail response to the Lead Inspector indicating the docket number and the assigned inspection report number. The Information Management Branch, DISP, will ensure that the docket number, inspection report number, and Lead Inspector information are entered into IRTS.
- (3) The Lead Inspector should notify staff directly participating in the inspection about the docket number and inspection report number. Professional direct staff should charge all staff hours devoted to the inspection to the docket number/inspection report number combination on the weekly reporting of hours in WISP. Branch chiefs, deputy division directors, division directors, associate directors, secretaries, licensing assistants, other administrative support staff, and the Office Director should not charge hours to an inspection. The Lead Inspector should refer to the docket number/inspection report number combination in all related correspondence in the format described in Inspection Manual Chapter (IMC) 0610.
- (4) All NRR staff participating in an inspection must insert the docket number and inspection report number on the NRC Form 279, "Travel Authorization," and NRC Form 64, "Travel Voucher Schedule of Expenses and Amount Claimed," to identify the travel expenses associated with the inspection. This requirement applies to NRR staff that may be participating in inspections led by either NRR or other NRC organizations.
- (5) Monthly, the Information Management Branch, DISP, will distribute to the Lead Inspectors for action and to the immediate supervisors and Branch Chiefs for information, the IRTS Status Report for all open inspection reports for the office (sample following). Note: the IRTS Status Report will continue to print data for inspections that have not been closed or cancelled, i.e., a Status Code of "C" for completed or "X" for cancelled have not been marked in prior updates to IRTS. To remove an inspection record from the IRTS Status Report printout, follow the instructions in 6.d below.

## SAMPLE IRTS STATUS REPORT

OFFICE OF NUCLEAR REACTOR REGULATION  
 REGULATORY INFORMATION TRACKING SYSTEM  
 INSPECTION REPORT TRACKING SYSTEM STATUS REPORT  
 STATUS AS OF: 02/20/1996

<1>	<2>	<3>	<4>	<5>	<6>	<7>	<8>	<9>
ORGANIZATION	LEAD INSPECTOR	FACILITY	*INSPECTION	INSPECTION COMPLETION DATE	REPORT DUE DATE	*REPORT ISSUANCE DATE	NUMBER OF DAYS OVERDUE	STATUS CODE
P132								
PSIB - SPECIAL INSPECTION BRANCH NRRLEADER		TURKEY POINT 4	05000251/91202	01/21/1991	02/20/1991	05/01/1991	70	C
		WATTS BAR 1	05000390/93201	11/18/1994	12/18/1994	12/28/1994	10	C
		WATTS BAR 2	05000391/93201	-	-	-	-	X
		WATERFORD 3	05000382/96201	01/20/1996	02/19/1996	-	2	-

REVIEWED BY: \_\_\_\_\_ / /  
 SIGNATURE DATE

\*REQUIRED FOR INSPECTION FEE BILLING  
 STATUS CODES: BLANK=ACTIVE, X=CANCELLED, C=CLOSED

- (6) After receiving the Monthly IRTS Status Reports, the Lead Inspector should take the following actions:
- (a) Review the IRTS Status Report and ensure that all pending inspections are listed in the report,
  - (b) Update the appropriate date fields, i.e., the inspection completion date (column 5) and the report issuance date (column 7),
  - (c) For report issuance dates that are not pre-printed, attach a copy of the transmittal letter of the inspection report without the technical details of the report to the IRTS Status Report. The Report Issuance Date should also be annotated on the IRTS Status Report. Copies of the transmittal letter of the inspection report will be used to substantiate inspection fees billed at the end of the quarterly billing cycle,
  - (d) In the Status Code field (column 9), mark an "X" for those inspections that have been cancelled and will not be rescheduled in the near future, or mark a "C" for closed to indicate that there will be no future effort expended on the inspection. Warning: Do not close the report on the IRTS Status Report when the inspection requires further review of licensee responses after the inspection report is issued or the inspection requires effort to support enforcement activities. The Lead Inspector may close the inspection on the IRTS Status Report if the outstanding issues are expected to be addressed in a future inspection. Only when all activities are completed for the inspection, should the Lead Inspector close the inspection report by marking a "C" in the status code field (column 9),



- (e) Sign the IRTS Status Report to indicate review of the information. Signed copies of the IRTS Status Report will be retained to validate inspection status during the quarterly fee billing process, and
  - (f) Return the signed IRTS Status Report to the Information Management Branch, DISP, Mail Stop 0-12H7.
- (7) The Information Management Branch, DISP, will update IRTS based on the annotated copies of the IRTS Status Report.
  - (8) Quarterly, the Information Management Branch, DISP, will notify the NRR License Fee Coordinator via e-mail that the data in IRTS has been verified. The verification process ensures that all inspection reports issued during the quarterly billing period are reflected in IRTS such that the inspection efforts may be billed to the licensee.

#### IRTS STATUS REPORT FIELD DEFINITIONS

##### **DOCKET NO.:**

The NRC docket number is required for opening an inspection report number in the IRTS. The docket number will appear in column 4 of the IRTS Status Report.

##### **INSPECTION REPORT NO(S).:**

The inspection report number will be assigned by the Information Management Branch, DISP, for inspections conducted by NRR. For these inspections, the report number sequence takes the following format: year + 2 (for the 200 series for headquarters) + sequential number of the report within that year.

##### **Example 1**

95201, where "95" represents the year 1995, "2" represents a headquarters inspection, and 01 represents the first inspection for the docket for the year.

##### **Example 2**

96202, where "96" represents the year 1996, "2" represents a headquarters inspection, and 02 represents the second inspection for the docket for the year.

The inspection report number appears in column 4, following the docket number, of the IRTS Status Report.

##### **LEAD INSPECTOR NAME/RITS INITIALS:**

The Lead Inspector's name and the RITS initials are required for opening an inspection report number in IRTS. The Lead Inspector is responsible for ensuring that: (1) the inspection report number is available for future staff hour charges and/or contractual support and (2) the listed information appears

in the IRTS Status Report. The Lead Inspector's name appears in column 2 of the IRTS Status Report.

#### **INSPECTION COMPLETION DATE:**

Inspection completion date is normally defined as the day of the exit meeting. For resident inspectors and integrated inspection reports, inspection completion is normally defined as the last day covered by the inspection report. This field is required in order to generate the report due date. The report due date calculates the date the inspection report is due to be issued in accordance with Inspection Manual Chapter (IMC) 0610. IMC 0610 states that the inspection reports should be issued no later than 30 calendar days after inspection completion (45 calendar days for integrated reports and major team inspections). The inspection completion date field appears in column 5 of the IRTS Status Report.

#### **REPORT DUE DATE:**

The system-generated report due date calculates a date 30 days from the inspection completion date. The report due date appears in column 6 of the IRTS Status Report.

#### **REPORT ISSUANCE (SENT) DATE:**

The report sent date is the date of the cover letter transmitting the inspection report to the licensee. This date is critical for billing of completed inspections during each quarterly billing cycle and should be entered into IRTS in a timely and accurate manner. A copy of the inspection report transmittal letter should be sent to the Information Management Branch, DISP, upon issuance to substantiate inspection fee bills. This date appears in column 7 of the IRTS Status Report.

#### **NUMBER OF DAYS OVERDUE:**

The number of days overdue is a system-generated calculation that prints the number of days the inspection report is past due for issuance based on the date provided in the Inspection Completion Date field (column 5). This calculation appears in column 8 of the IRTS Status Report.

#### **STATUS:**

##### Cancelled

When an inspection is cancelled and is not intended to be rescheduled in the near future, the Lead Inspector should mark an "X" for cancelled on the IRTS Status Report.

##### Closed

When all activities such as preparing and documenting the inspection, reviewing licensee written responses, and preparing, reviewing, and commenting on proposed and final enforcement actions are completed, a status code of "C"

may be indicated on the IRTS Status Report. The closed status will prevent changing any future staff hours and/or contract costs to the closed inspection. The inspection may be closed in IRTS although followup issues may be addressed during a future inspection.

When an inspection is cancelled or closed in the IRTS database, the inspection will not appear on future printouts of the IRTS Status Report. The status code field appears in column 9 of the IRTS Status Report.

**ADDITIONAL INFORMATION:**

The additional information field may be used to capture special notations regarding the inspection. This field is 60 characters long and is particularly useful when validating a cancelled inspection.

Indicate in the box: C=Copy w/o attachment, E=Copy w/attachment, N=No copy

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