INSPECTION PROCEDURE 71152

(DRAFT) PROBLEM IDENTIFICATION AND RESOLUTION (PI&R)

Effective Date: January 1, 2026

PROGRAM APPLICABILITY: IMCs 2515 A, 2201 A

CORNERSTONES: ALL

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
Baseline PI&R Review	03.01	NA	NA	NA	10-15 percent*
Semiannual Trend Review	03.02	Semiannual	2	2	20-24 hours
Annual Follow-up of Selected Issues	03.03	Annual	7	7 to 9	90-110 hours per site
Review of Open Corrective Actions to Preclude Repetition (CAPRs) from Supplemental Inspections		As required**	1	1	

* Inspection Time spent assessing PI&R as part of the baseline procedure attachments should be charged to the corresponding baseline procedure.

**Required if there are open CAPRs following conclusion of a supplemental inspection

71152-01 INSPECTION OBJECTIVES

01.01 To confirm that licensee's implementation of problem identification and resolution (PI&R) programs are complying with NRC regulations and applicable industry standards.

01.02 To evaluate the effectiveness of the licensee's PI&R program in identifying, prioritizing, evaluating, and correcting problems.

01.03 To confirm the licensee's appropriate use of industry and NRC operating experience.

01.04 To evaluate the effectiveness of licensee audits and self-assessments.

01.05 To gauge supplemental response when Reactor Oversight Process (ROP) Action Matrix thresholds are crossed.

01.06 To confirm licensees have established a safety conscious work environment (SCWE).

01.07 To follow-up on corrective actions for selected previously identified compliance issues (e.g., non-cited violations (NCVs)).

01.08 To conduct follow-up of individual issues through a more focused review.

01.09 *To confirm that licensees are identifying and placing potential 10 CFR 21—"Reporting of Defects and Noncompliance" issues into the (CAP) and appropriately evaluating them.* [C3]

01.10 *To review the licensee's trending of long-standing, unresolved problems.* [C1]

71152-02 GENERAL GUIDANCE

Licensee PI&R programs include all methods of identifying, prioritizing, evaluating, and correcting deficiencies. These programs commonly include but are not limited to the licensee corrective action and work management programs. However, any other licensee program or process that addresses deficiencies with risk significant systems, structures and components (SSCs), compliance with regulatory requirements (to include security, emergency preparedness and radiation protection), or adherence to licensee commitments and standards is within the scope of the PI&R program. Resident inspector routine PI&R review guidance is contained in Inspection Manual Chapter (IMC) 2515, Appendix D, "Plant Status."

PI&R inspections should follow a performance-based approach to the maximum extent possible. Evaluate products and results of the licensee's PI&R program, including the use of operating experience (OpE), assessments, and audits. Focus on the results associated with risk-significant issues across all the cornerstones. For issues that are determined to be performance deficiencies, inspectors should evaluate the causes that relate to cross-cutting areas, as defined in IMC 0310, "Aspects Within The Cross-Cutting Areas", for insights on performance. Inspections performed in accordance with this procedure should focus on the identification, prioritization, evaluation, and corrective actions for risk-significant issues; programmatic and procedural elements associated with PI&R should be of concern when they contribute to risk-significant issues.

If inspectors become aware of (1) instances of employees being discouraged from raising safety or regulatory issues within the licensee's or contractor's organization or to the NRC, (2) a "chilling" effect, or (3) other general reluctance of employees to raise safety or regulatory issues unrelated to a specific event or incident, they should discuss with regional management. Inspection Procedures IP 93100, "Safety Conscious Work Environment Issue of Concern Follow-up," or IP 93816, "Problem Identification and Resolution Team Inspection," are designed to further inspect these areas. Regional Administrator approval is required for implementation of the appropriate procedure.

The intent of this inspection procedure (IP) is to provide insights into licensee performance in the PI&R area based upon a performance-based review of corrective action issues, operating

experience, and self-assessments/audits. More detailed programmatic reviews of licensee performance in the PI&R area can be conducted during the PI&R team inspection if entry criteria in Appendix A of this IP are met, and authorized by the Regional Administrator, and/or during supplemental inspections if established performance thresholds are crossed.

Notify Quality Assurance and Vendor Inspection Branch staff when issues related to potential vendor or supplier deficiencies (e.g. 10 CFR Part 21) are reviewed. Include the vendor's name and provide a brief description of the deficiency and component, as appropriate. [C3]

02.01 Sample Selection Guidance

Inspectors should seek the broadest range of examples from all the cornerstones when selecting inspection samples. Any failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances that either have been placed into a licensee's PI&R program or inspectors believe should be placed into a licensee's PI&R program in order to comply with any regulatory or applicable industry standards (including self-imposed) are within the scope of this procedure. Inspectors can obtain insights for determining appropriate samples from reviewing previous inspection reports and end of cycle assessments and discussing PI&R program issues with site and regional staff who are familiar with previously inspected areas. Inspectors may also reach out to NRR operating experience (OpE) staff for insights, if needed. Regional offices, as a part of the assessment and inspection planning processes, can also discuss and recommend general areas or specific samples in order to focus inspection resources on areas determined to have actual or potential performance concerns.

Inspectors should use relevant risk insights, such as maintenance rule program basis documents, current licensee risk analysis results or insights, licensee system health reports, and the Plant Risk Information eBook (PRIB) found in the site-specific standardized plant analysis risk (SPAR) model when selecting samples.

Inspectors may consider samples from the sources listed below. The sample selection guidance is intended to ensure the U.S. Nuclear Regulatory Commission (NRC) obtains insights into a licensee's PI&R program across the cornerstones throughout an assessment cycle.

a. Licensee-identified issues, including issues identified during audits, self-assessments, and licensee event reports (LERs). LER closures are documented under IP 71153, but in-depth reviews of corrective action documents associated with LERs can also be counted as samples under this procedure. The review can include verifying performance indicators (i.e., IE01, IE04, and MS05), where IP 71151 (now reference use-only) can be referenced for additional guidance. The review may also include corrective actions associated with the adequacy of personnel performance. Refer to IP 93816 for additional guidance related to the review of self-assessments and audits.

b. Corrective actions associated with NRC documented issues e.g., notice of violation (NOVs), NCVs, findings (FINs). Requirement 03.03.b addresses follow-up of corrective actions associated with greater than green findings or performance indicators (PIs). Inspectors should also review the licensee's response to a sample of NOVs, NCVs, and FINs in each cornerstone unless none were identified.

c. NRC-identified issues during baseline, supplemental, and reactive inspections. Review observations from previous PI&R samples in reports and any reactive or supplemental

reports during the current and previous assessment periods. Other baseline teams may uncover PI&R issues not within the scope of their inspection and refer the issues to the project branch for follow-up. Discuss such issues with respective NRC inspectors and management as part of inspection preparations.

d. *Safety culture assessments. A licensee's evaluation of specific cross-cutting areas, functional departments, or levels (e.g., supervisors or non-supervisory workers) may constitute a safety culture assessment review.* [C2]

e. *Issues identified through alternative avenues, such as employee concerns or similar programs* [C2]. Note that some members of the licensee staff may not have authorized access to information about issues that are captured in these programs. Inspectors should protect this information from disclosure to any unauthorized personnel by limiting verbal or written discussions to only those licensee staff that have access rights to the subject records and to inspection team members that have a need-to-know. Inspectors may restrict access to portions of the exit or debrief meetings as appropriate. For the review of safety conscious work environment issues, refer to IP 93816 for additional guidance.

f. *Issues identified through NRC and industry operating experience exchange mechanisms* [C1] (e.g., NRC generic communications, nuclear steam system supplier vendor reports, Electric Power Research Institute reports, and operating experience reports from similar facilities, INPO event reports, and NRC Operating experience smart samples). Refer to IP 93816 for additional guidance on the review of licensee's use of NRC and industry operating experience.

g. Issues captured in databases maintained by the site's corporate office. A site's corporate office may track such issues separately from the site's PI&R program. Inspectors may choose to view the contents of such databases to ensure that issues and operating experience are communicated to affected sites owned or operated by or associated with the corporate entity. Should an issue be identified on site that could affect a cornerstone or regulatory compliance and that issue is captured in the corporate PI&R program, that issue and the licensee's handling of it may be reviewed, even though it is a corporate PI&R program issue. A review of corporate corrective action programs can identify important information affecting multiple sites, such as those identified with bio diesel fuel for which the office of NRR issued Information Notice (IN) 2009-02, for example.

h. Cause analyses and corrective action documentation associated with risk significant SSCs or functions. This includes SSCs or functions classified as (a)(1) status in accordance with the Maintenance Rule (10 CFR 50.65) and failures that resulted in operability evaluations. Inspectors should review the licensee's trending analysis associated with these SSCs or functions to determine whether the licensee's PI&R program should have enabled the identification and correction of the issue prior to the SSC or function failure and/or obtaining (a)(1) status. Inspectors may refer to IMC 0326 for additional guidance related to operability determinations.

i. Emerging or existing cross-cutting themes. Inspectors should review licensee actions or products associated with the identified theme for effectiveness.

j. Issues identified by safety review committees or other management oversight mechanisms.

k. Issues that challenge operator performance including but not limited to: operator work arounds, Main Control Room deficiencies, operator burdens and challenges, night orders or standing orders, temporary logs, control room or equipment operator logs, and work requests or work orders dealing with long standing issues.

l. Issues that may be age-related (e.g., due to aging effects such as loss of material, loss of preload, or cracking). Plants with renewed licenses have established aging management programs (AMPs) to identify, address, or prevent aging effects prior to loss of intended function for those SSCs within the scope of the AMP. When inspecting degradation or failures that appear to be age-related, inspectors should, in addition to other inspection activities, determine whether the SSC is being managed by an AMP. If so, the inspector should also determine whether the activities in the AMP are adequate to identify the aging effect prior to loss of SSC intended function, and whether the licensee's corrective actions address the adequacy of the AMP. Consult with the regional license renewal point of contact for support in evaluating the adequacy of the AMP.

m. Fatigue-related issues identified through fitness for duty effectiveness reviews or licensee assessments reports, see 10 CFR 26.717(9). Refer to IP 93002, "Managing Fatigue" for additional guidance.

n. *Defects and non-conforming materials, parts, or components may present a substantial safety hazard. Inspectors should inspect defects or non-conforming conditions for compliance with 10 CFR 50, Appendix B, and 10 CFR 21. Specifically, inspectors should verify that licensees are identifying and placing potential 10 CFR 21 issues into the CAP and appropriately evaluating them. Inspectors may refer to IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," and IP 43004, "Inspection of Commercial-Grade Dedication Programs," for additional guidance.* [C3]

o. *Inspectors can review Institute of Nuclear Power Operations (INPO) findings, recommendations, corrective actions, and operating experience that are documented in the licensee's PI&R program. Inspectors may refer to the NRC/INPO Memorandum of Agreement, dated December 1, 2022 (ML23026A093), for guidance prior to reviewing any INPO documents.* [C1]

71152-03 INSPECTION REQUIREMENTS

PI&R activities are reviewed in three locations within the baseline inspection program: baseline reviews; semiannual trend reviews; and annual follow-up of selected issues.

03.01 Baseline PI&R Review

Conduct a review of licensee PI&R activities during the conduct of baseline inspection procedures to verify that the licensee has identified equipment, human performance, and program issues at an appropriate threshold, entered them into the PI&R program, classified them in accordance with licensee procedures, and has taken appropriate corrective actions. **[C1]**

Specific Guidance:

Most of the baseline IPs contain a requirement to inspect PI&R performance within the IP's subject area. The inspection of PI&R performance as part of baseline IPs is intended to ensure that over the course of an assessment cycle, a sample of PI&R performance in all cornerstones is established. The primary focus of this portion of the PI&R review should be on verifying that licensees are identifying issues at an appropriate threshold and entering them into their PI&R program. However, inspectors are not precluded from the review of corrective action documents once they have been dispositioned to identify potential areas for further inspection. Inspectors should consider PI&R insights when selecting baseline inspection samples and may follow up on PI&R issues as part of a baseline inspection procedure's PI&R review. Inspectors can review the selected samples against the success criteria contained in IP 93816. Inspectors may choose to assess licensee performance against selected success criteria, as necessary, to be most effective.

Inspectors should compare issues identified by the NRC during the conduct of the inspectable area portions of the baseline inspection program IPs with issues identified by the licensee. Additionally, inspectors can follow up on selected issues and operational occurrences to ensure that corrective actions commensurate with the significance of the issues have been identified and implemented by the licensee.

Inspectors should be alert for potential performance deficiencies as may be associated with equipment failures, inadequate maintenance work practices, personnel errors, inadequate risk assessments, management and emergent work control problems, procedure deficiencies, or non-compliances with procedures or regulatory requirements. When inspectors identify such conditions, they should examine the licensee's PI&R program records or attend licensee PI&R program meetings to verify that the licensee either previously identified and documented the conditions noted by the inspector or acknowledged the inspector's observations and entered those conditions into the PI&R program.

In addition, inspectors should be alert for indications that may require performance of IP 81823, "Material Control and Accounting (MC&A)." Those indications include 1) discrepancies identified during inventory, 2) item discrepancies during item movement, 3) fuel bundle reconstitutions, 4) discovery of fuel fragments at any time, or 5) other special nuclear material (SNM) accounting and control anomalies. If inspectors become aware of MC&A issues, they should reach out to regional management to determine if the IMC 2201 Appendix C inspection needs to be performed.

Documentation of a baseline inspection procedure scope constitutes completion of the baseline PI&R review. There is no requirement to document a separate PI&R observation or sample completed as part of a normal baseline sample. However, inspectors should confirm that licensee's implementation of the PI&R programs are

complying with NRC regulations and applicable industry standards necessary for continued participation in the Reactor Oversight Process.

Issues of concern identified during the Baseline PI&R review may be deferred to an annual follow-up of selected issues sample.

03.02 Semiannual Trend Review

Review licensee PI&R program documents (e.g., issue tracking databases, licensee audits, and self-assessments) to identify potential trends (either NRC- or licensee-identified) that might indicate the existence of a more significant safety issue.

Specific Guidance:

The scope of this review should include repetitive or closely-related issues that may have been documented by the licensee outside the normal corrective action program (CAP), such as: trend reports, metrics, performance indicators, major equipment problem lists, repetitive or rework maintenance lists, departmental problem or challenge lists, issues that challenge operators in performing duties (e.g., workarounds), system health reports, quality assurance audit or surveillance reports, self-assessment reports, maintenance rule assessments, or corrective action backlog lists. [C1]

Consider a review of PI&R documents which have been dispositioned to identify potential adverse trends in SSCs as evidenced by acceptance of long-standing non-conforming or degraded conditions. Such indicators could include "use-as-is" determinations, revision of engineering or operational acceptance criteria, reductions in design or operational margin, and repetitive work orders. Review the selected sample against the success criteria in IP 93816.

Inspectors could also perform a review of findings or events over a period of time for indications of common causes. Inspectors should be careful not to aggregate findings during this review, but to focus on whether findings or events exhibit similar causes and if those causes constitute a separate concern.

Inspectors should consider expanding the scope of the trend review to at least 5 years to detect and evaluate long term trends. Among the samples chosen for this extended review should be those issues whose significance might be age-dependent, such as issues associated with erosion of piping, degradation of safety-related raw water systems, boric acid accumulations, aging of electronic components, environmental qualification, etc. [C1]

Inspectors should consider emerging or existing cross-cutting themes during the semiannual trend review to develop insights into the licensee's progress in addressing the themes. *Inspectors can perform this review by summarizing the results of the licensee's reviews and comparing those results to those identified by the NRC through the baseline or supplemental inspection program, including issues identified as a result of the routine PI&R review in IMC 2515, Appendix D, "Plant Status." This information could be incorporated into an assessment under section 03.03.* [C1]

Inspectors should document an inspection observation, in accordance with IMC 0611, when a potential adverse trend that might indicate the existence of a more significant

safety issue is identified. Observations should include how the potential adverse trend relates to the success criteria in IP 93816 and any licensee actions in response. The level of documentation for the trend review may include trends that do not rise to the level of an inspection finding. Observations may include documentation of minor violations and minor performance deficiencies as well as insights into the licensee's effectiveness at identifying, evaluating, and correcting problems using the PI&R program.

Additional issues of concern identified during the semiannual trend may be deferred to an annual follow-up of selected issues sample.

03.03 Annual Follow-Up of Selected Issues

a. Perform an in-depth review of selected issues to ensure that the licensee has planned or implemented corrective actions commensurate with the significance of the identified issues.

Specific Guidance

Annual samples should be performed by the inspectors most appropriate to the sample. This could be resident inspectors from licensee's or another site, or regional or headquarters subject matter experts. These samples may be reviewed throughout the annual assessment cycle. Samples should be representative of all the cornerstones. Inspectors may use the guidance contained in section 02.01 as an aid in selecting samples for review.

When evaluating the effectiveness of a licensee's corrective actions for a particular issue, the potential impact on nuclear safety and risk should be the primary factors in the licensee's classification and prioritization of corrective actions. *Inspectors should review the selected samples against the success criteria in IP 93816 to develop insights into the licensee's PI&R program and appropriate use of industry and NRC operating experience.* [C1] Inspectors are not expected to assess all of the success criteria for every issue selected for follow-up. Instead, inspectors may choose to assess licensee performance against selected success criteria, as necessary, to be most effective. Inspectors can also refer to IP 95001 for guidance on assessing licensee evaluations of significant performance issues (i.e., root cause analysis or other causal product).

As part of followup on a particular issue, inspectors may perform periodic PI verification, if issues or questions arise regarding the accuracy of the data that the licensee reports. Refer to IP 71151 (now reference use only) for additional guidance.

Inspectors may review longstanding and operating experience issues using risk insights to select issues that have been processed through the licensee's PI&R program. Inspectors may also review a sample of licensee audits and self-assessments. [C1] IP 93816 provides additional guidance.

In addition, inspectors may review issues that pose challenges to the free flow of information for adequate resolution. [C2] IP 93816 provides additional guidance.

Following the issuance of an assessment letter identifying a cross-cutting issue (CCI), the licensee's progress in addressing the issue may be evaluated as an annual sample.

Inspectors may also assess the effectiveness of the licensee's PI&R program through review of inspection results from semi-annual trend samples, annual follow-up of selected issues, completed CAPRs, and any team inspections. Inspectors should also review the entry criteria for IP 93816 to determine whether the PI&R team inspection is warranted.

Document observations or assessments in accordance with IMC 0611. This documentation standard is different from issues elsewhere in the quarterly integrated inspection reports. Observations should include a description of the scope of the sample, the basis for the selection, and a description of the licensee's completed or planned corrective actions. The length of the observation may vary depending on the complexity of the issue. In addition, observations may include documentation of minor violations and minor performance deficiencies. Assessments should include a description of the inspection results reviewed, discussion of overall conclusions of the licensee PI&R program, and a determination of whether the entry criteria in Appendix A are met. Violations and more than minor performance deficiencies should be documented separately in accordance with IMC 0611.

b. Review corrective actions related to greater-than-green findings and performance indicators that were not completed by the end of the associated supplemental inspection.

Specific Guidance

A review of all completed corrective actions for greater-than-green findings and performance indicators provides additional assurance that the licensee's completed corrective actions for risk-significant performance issues are sufficient to address the root and contributing causes and prevent recurrence. Perform follow-up inspection of any planned (Open) Corrective Actions to Preclude Repetition that were not completed following an IP 95001 or IP 95002 supplemental inspection. Section 11 of IMC 2515, Appendix B, provides additional guidance.

71152-04 REFERENCES

Audit of NRC's Implementation of 10 CFR Part 21, Reporting of Defects and Noncompliance (OIG-11-A-08, March 23, 2011, ML110820426)

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

IMC 0326, "Operability Determinations"

IMC 0611, "Power Reactor Inspection Reports"

IMC 2515, Appendix B, "Supplemental Inspection Program"

IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance"

IP 43004, "Inspection of Commercial-Grade Dedication Programs"

IP 71153, "Follow up of Events and Notices of Enforcement Discretion"

IP 93002, “Managing Fatigue”

IP 93100, “Safety Conscious Working Environment Issue of Concern Follow-up”

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

IP 95002, “Supplemental Inspection Response to Action Matrix Column 3 (Degraded Performance) Inputs

IP 93816, “Problem Identification and Resolution (PI&R) Team Inspection”

NRC Enforcement Manual

NRC Enforcement Policy

NRC/INPO Memorandum of Agreement, dated December 1, 2022 (ML23026A093)

Regulatory Guide 1.33, “Quality Assurance Program Requirements (Operation)”

END

List of Appendices:

Appendix A: Entry Criteria for IP 93816

List of Attachments

Attachment 1: Revision History for IP 71152

Appendix A: Entry criteria for IP 93816, PI&R Team Inspection

The criteria below provide the requirements for implementation of IP 93816, subject to Regional Administrator approval in accordance with IMC 2515 Appendix C. If the entry criteria are met, the team inspection is warranted in Columns 1, 2, and 3 of the Action Matrix. The team inspection is not recommended in Column 4 of the Action Matrix.

Findings:

1. Two or more Greater-than-Green (GTG) findings in the area of PI&R or performance deficiencies related to PI&R in a 12-month period

2. Five or more cumulative findings in the area of PI&R or performance deficiencies related to PI&R in any 12-month period that the regional office has concerns about the adequacy of the licensee corrective actions.

Supplemental and IMC 0350 Inspections:

1. Supplemental inspection identifies and documents a significant weakness in the PI&R program which the licensee did not identify

2. Results of a supplemental inspection or IMC 0350 inspection document a SCWE concern. (See Note)

Note: For SCWE oversight there will be two IMC 2515 Appendix C inspections – IP 93100 and IP 93816. Only one of these inspections shall be performed for a SCWE issue. The Regional Administrator should choose the inspection that is most applicable. For example, if the SCWE issue has a potential effect on the licensee's PI&R program, then IP 93816 would be appropriate.

Attachment 1: Revision History for IP 71152

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	03/06/2001 CN 01-006	Revised to delete certain inspection requirements (collective risk of maintenance backlog and equipment unavailability accounting), eliminate duplication within the procedure, and provide additional guidance concerning the review of a safety conscious work environment.	N/A	N/A
	01/17/2002 CN 02-001	Revised to include changing the inspection frequency to biennial and add guidance on the conduct of inspections of 3 to 6 samples per year outside of the team inspections.	N/A	N/A
C1	09/08/2003 CN 03-032	Revised to incorporate recommendations made by the PI&R focus group to address several items from the Davis Besse Lessons Learned Task Force. The changes include enhanced requirements regarding the routine PI&R reviews conducted by resident inspectors, biennial reviews of longstanding issues, and biennial reviews of operating experience issues.	Yes 09/24/2003	N/A
	ML053490187 01/05/2006 CN 06-001	A requirement to inspect for cumulative effects of operator workarounds to IP 71152 as one of its annual samples was added. Also, the annual sample size and the estimate inspection resources required to complete this IP were increased to support review of operator work-arounds. Completed historical CN search.	N/A	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
C2	ML061560498 06/22/06 CN 06-015	Guidance added for procedure completion regarding annual sample size. Procedure now requires that the time spent to review condition reports to be charged to IP71152 instead of the plant status procedure. Hours have been increased for condition report reviews. Incorporate safety culture initiatives described in Staff Requirements - SECY-04-0111, "Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture," dated August 30, 2004.	N/A Yes 1/7/2006	ML061570086
	ML070720179 09/20/07 CN 07-029	IP 71152 has been revised to add guidance on NRC use of INPO documents.	N/A	ML071560246
	ML073540265 01/10/08 CN 08-001	IP revised to address ROP Feedback Form 95001-1125 and some enhancements identified by the Problem Identification and Resolution Best Practices draft report.	N/A	ML073540274

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML093270053 02/26/10 CN 10-008	This revision incorporates: Resolution of ROP feedback forms: 71152-1314 (increased sensitivity to handling of confidential ECP information), -1322 (optional review of corporate databases to select samples), -1381 (interviewing long-term contractors for SCWE insights) and -1474 (budget hour correction). An additional inspection attribute for the Biennial Team Inspection to address a 2007 External Survey Comment. Added an additional 4 hours of inspection resources per the 2009 ROP Realignment Results (ML092090312).	N/A	ML100050386
	ML101090438 08/18/11 CN 11-013	Added an inspection requirement to inspect completed corrective actions for greater than green inspection findings (feedback form 71152-1449), and added additional guidance related to the review of quality assurance audits (feedback form 71152-1400). Added reference to IP 93100, “Safety Conscious Working Environment Issue Follow-up” and provided additional guidance for follow-up (FF 71152-1561), provided additional guidance for inspectors in the selection of condition reports for the routine and semi-annual reviews (FF 71152-1626).	N/A	ML111870499

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML112360542 12/05/2011 CN 11-039	Added guidance for license renewal age management programs. Add requirement to verify applicable10 CFR 21 notifications entered into the licensee's CAP. Added sample selection guidance and references related to inspecting defects and nonconforming materials, part, or components. Resources changed to reflect the 2011 ROP Realignment (ML11178A329).	N/A	ML11332A016
C3	ML13030A098 01/31/13 CN 13-004	Added guidance ensures that potential Part 21 issues are evaluated on a continual basis. This and CN 11-039 guidance and an associated objective pertaining to 10 CFR 21 are established as commitment C3.	N/A	
	ML13179A365 08/13/13 CN 13-017	Relocated some of documentation guidance related to the biennial PI&R inspection contained in Section 03.07 of this IP to IMC 0612 App D to eliminate redundancy and possible guidance conflicts.	N/A	
	ML14316A042 02/26/15 CN 15-003	Relocated Operator Work-around inspection requirement to IP 71111.15; enhanced alignment of 71152-01 INSPECTION OBJECTIVES with IMC 0308 Att. 2 Fig. 37; enhanced IP organization; aligned language to updated IMC 0310 nomenclature; enhanced communications with the NRC Vendor Inspection Center of Expertise for vendor or supplier deficiencies; updated references to external IP's and IMC's and eliminated reference to retired RIS 2005-20; eliminated use of undefined terminology; and enhanced integration of OpE Smart Samples into inspection sample population. This revision addresses or partially addressed FBF's 71152-1787, -1836, -1946, -1964, -2012, -2013, and -2022.	N/A	ML14287A039 ML15027A203 ML15027A208 ML15027A211 ML15027A215 ML15027A219 ML15027A222 ML15027A228

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML21281A181 12/14/21 CN 21-040	Revised to IMC 0040 format. Transferred requirements, commitments, guidance, and resources for daily review of Problem Identification and Resolution items to IMC 2515, Appendix D, “Plant Status” as recommended by the Comprehensive Review of the Problem Identification and Resolution Program (ML20247J602). Additionally, select feedback forms were resolved at this time as determined appropriate to the limited content revision. No additional changes to guidance or content in this revision. Additional recommendations and feedback forms will be incorporated into the next revision.	N/A	ML21281A182 71152-1718 ML21291A166 71152-1833 ML21291A167 71152-1841 ML21291A168 71152-1842 ML21291A169 71152-1870 ML21291A170 71152-2020 ML21291A171 71152-2291 ML21291A172

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML23214A284 10/31/23 CN 23-032	Implementation of additional recommendations from Problem Identification and Resolution Comprehensive Review (ML20247J602). Added qualitative guidance for assessment of PI&R effectiveness, and enhanced documentation guidance. Incorporated lessons learned from Browns Ferry and Fort Calhoun. All open feedback forms were resolved at this time.		ML23222A178 71152-1968 ML22357A102 71152-1988 ML22357A104 71152-2017 ML22357A107 71152-2021 ML22357A109 71152-2023 ML22357A110 71152-2025 ML22357A112 71152-2322 ML22361A107 71152-2344 ML22361A108 71152-2471 ML22305A607
	ML25311A092 DRAFT	Major revision to remove team inspection and incorporate attributes into semi-annual trend review and annual follow-up of selected issues. Addressed FBF's 71152-2515, and 2561. Revised to include direction that minor violations and minor performance deficiencies can be documented under the semi-annual trend sample. These revisions were recommended as a result of the ADVANCE Act 507 Report to Congress that discussed the revision of the ROP Baseline Inspection Program.	XX/XX/XX	ML25274A088 71152-2515 ML24052A396 71152-2561 ML25080A201