



NRC Reactor Oversight Process (ROP) Bimonthly Public Meeting

November 19, 2025

Purpose, Outcome, Plan/Agenda

Purpose of the Presentation

- To discuss proposed revisions to the ROP Baseline Inspection Program and the More-than-Minor (MTM) Issue Screening Criteria.

Desired Outcome

- Communicate proposed revisions to the inspection program, inspection procedures, and MTM issue screening criteria to industry and members of the public.

Agenda

Time	Topic	Presenter
9:00am	Introductions and Opening Remarks	Phil McKenna and NEI
9:05am	Emergency Preparedness Significance Determination Process Update	Don Johnson
9:15am	Engineering Inspection Procedure Discussion	Doug Bollock
9:35am	Problem Identification and Resolution Inspection Procedure Discussion	Sarah Obadina
9:55am	Radiation Protection Inspection Program Updates	David Garmon
10:15am	Update on the Differing Professional Opinions Process	Gladys Figueroa Toledo
10:35am	Performance Indicator Discussion and Next Steps	NEI
11:00am	Updated Information Regarding the Documentation of Findings	Manuel Crespo
11:10am	ROP Baseline Inspection Program SECY Update	Phil McKenna
11:20am	Open Discussion	NRC, NEI, Industry
11:40am	Additional Opportunity for Public Comments	Members of the Public
11:55am	Action Items & Closing Remarks	NRC & NEI
Noon	Meeting Adjourn	

Emergency Preparedness Significance Determination Process Update

Don Johnson

Senior Emergency Preparedness Specialist

Policy and Oversight Branch

Office of Nuclear Security and Incident Response

Update on Emergency Preparedness Significance Determination Process

- Revised to implement SRM SECY-22-089
 - Revised to focus the significance determination, for inspection findings, on the planning standards having a direct impact on public health and safety as well as those that have a direct relationship with the effective implementation of these risk significant functions.
Actual event inspections will consider all planning standards.
- Enhanced the guidance for the significance determination for (b)(9) due to recurring issues with the significance determination for findings related to dose assessment models and radiation monitors.
- Re-emphasized the importance of using technical judgement when determining the significance of inspection findings, and for ensuring that the determination considers all mitigating factors.

New Engineering Inspection

Doug Bollock
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Reactor Inspection Branch

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Office of Nuclear Reactor Regulation

Elements of New Engineering Inspection Procedure

- **New Inspection Procedure (IP 71111.21A) (ML25303A281):**
 - Consolidates previous inspection procedures (e.g., POV, EQ, CGD).
 - Tailored to specific Structures, Systems, and Components (SSCs) being inspected.
- **Inspection effort:**
 - **2–3-member team** (includes resident inspector). 175–210 hours (defined in the inspection plan).
 - **Onsite for two weeks**
- **Flexible Scope & Focus:**
 - Inspection scope is **adaptable** to target problem areas.
 - Specific guidance based on SSCs selected for inspection.
 - Inspection can be completed in two consecutive weeks or spread out over some time period within a year, depending on the samples selected.
- **Industry Comments?**

Problem Identification and Resolution (PI&R) Inspection Procedure Changes

**Sarah Obadina
Reactor Operations Engineer
Reactor Inspection Branch**

**Division of Reactor Oversight
Office of Nuclear Reactor Regulation**

IP 71152 – PI&R

- Annual Follow-up
 - Minimum samples increased from 4 to 7 with a resource estimate increase from 64 to 90 hours
 - Current sections of PI&R Team Inspection included as optional samples:
 - Licensee audits and self-assessments
 - Licensee use of operating experience
 - Review of issues that pose challenges to the free flow of information for adequate resolution
 - Assessment
- Semi-annual trend review
 - Five-year review

IP 93816 - PI&R Team Inspection

- Two-member team, onsite for one week (Flexibility on inspection resources used)
 - Inspection hours estimate: 60-80 (depending on complexity of the issue(s))
 - Fully qualified inspectors with option to include inspectors with specialized expertise (e.g., qualified safety culture assessor, regional inspectors)
- Flexible inspection scope with options to focus on problem areas
 - CAP effectiveness
 - Licensee audits and self-assessments
 - Licensee use of operating experience
 - Review of issues that pose challenges to the free flow of information for adequate resolution
- Charter will specify what aspects of the inspection will be performed
 - Regional Administrator approval required
- Entry Criteria

PI&R Inspection Procedures

Industry Comments

Documentation of Findings

Manuel Crespo
Reactor Operations Engineer
Reactor Inspection Branch
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Office of Nuclear Reactor Regulation

Documentation of Findings

- In [SECY-25-0045](#) the staff informed the Commission that NRR would produce guidance to reduce the documentation requirements for Green and Severity Level IV non-cited violations.
- Notices of Violations (Green and/or Severity Level IV) would maintain the current documentation level.
- The goal for this action would go into affect for any inspection activity performed in 2026. IMC 0611 will be revised as on January 1, 2026, but 4th quarter 2025 integrated inspection reports (issued by February 15, 2026), would use the 2025 procedure to document Green findings.

Updated Information Regarding Documentation of Findings

Current

Introduction
Description
Corrective Actions
Corrective Action References
Performance Deficiency
Screening
Significance
Cross-Cutting Aspect
Violation
Enforcement Action



Revised Green/Severity Level IV NCV

Introduction
Description
Corrective Action References
Performance Deficiency
Significance Determination [IMC only]
Cross-Cutting Aspect [aspect only]
Violation [“Contrary to” statement only]
Enforcement Action

Updated Information Regarding Documentation of Findings

Current

Failure to Control Transient Combustible Material			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000XXX/2023 004-01 Open/Closed	[H.2] - Field Presence	71111.05
A Green NRC-identified finding and associated non-cited violation (NCV) of the Unit 1, Renewed Facility Operation License, Condition 2.E, was identified for failure to adhere to the requirements of a transient combustible exclusion zone (TCEZ). Specifically, on October 17, 2023 and October 19, 2023, Licensee failed to ensure transient combustibles were properly controlled as required by OP-AA-201-009, "Control of Transient Combustible Material."			



Revised

Failure to Control Transient Combustible Material			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green	Human Performance	71111.05
Attribute	Type	Tracking Number	Status
Protection Against External Factors	NCV	05000XXX/20230 04-01	Closed
A Green NRC-identified non-cited violation (NCV) of the Unit 1, Renewed Facility Operation License, Condition 2.E, was identified when the licensee did not ensure transient combustibles were properly controlled in fire area 39 and 16 as required by OP-AA-201-009, "Control of Transient Combustible Material" on October 17, 2023, and October 19, 2023, respectively.			

Updated Information Regarding Documentation of Findings

Current

Description: On October 17, 2023, inspectors performed a walkdown of the Unit 1, service water pump room, fire area 39, and identified an area beneath a room stairway marked “no combustible permanent storage area” with transient combustibles stored in the area. Licensee issued AR 4710362 to capture the issue and removed the combustible materials.....

Corrective Actions: Licensee removed the associated transient combustibles from the areas when identified on October 17, 2023 and October 19, 2023. Licensee’s corrective action for the October 19 transient combustibles included performing a human performance review board. Additionally, on October 19, 2023, Standing Order 23-13, was issued requiring restricted access to TCEZs, the logging of all transient combustibles into TCEZs, and a supervisor to perform an independent walkdown of the area following the removal of transient combustibles.

Corrective Action References: AR 4711095, AR 4710362



Revised

Description

On October 17, 2023, during a walkdown of the Unit 1, service water pump room (fire area 39), the inspector transient combustibles stored in an unauthorized area. OP-AA-201-009, “Control of Transient Combustible Material,” Revision 29, step 4.4.1.5, states that combustible material should not be stored...

Corrective Action References: AR 4711095, AR 4710362

Updated Information Regarding Documentation of Findings

Current

Performance Assessment:

Performance Deficiency: The inspectors determined that Licensee's failure to implement OP-AA-201-009 for the control of transient combustibles was a performance deficiency. **Specifically...**

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Protection Against External Factors attribute of the Mitigating Systems cornerstone and...

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." **The finding screened...**

Cross-Cutting Aspect: H.2 - Field Presence: **Leaders are commonly seen in the work areas of the plant observing, coaching, and reinforcing standards and expectations. Deviations...**



Revised

Performance Assessment:

Performance Deficiency: The inspectors determined that Licensee's did not properly implement OP-AA-201-009 for the control of transient combustibles.

Significance Determination: IMC 0609 Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP."

Cross-Cutting Aspect: H.2 - Field Presence

Updated Information Regarding Documentation of Findings

Current

Enforcement:

Violation: Unit 1, Renewed Facility Operating License for Licensee Nuclear Power Plant, Condition 2.E., requires, in part, that Licensee implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the License Amendment Request, dated September 24, 2013, and as approved in the NRC Safety Evaluation, dated August 30, 2016.

NRC Safety Evaluation, dated August 30, 2016, stated...

Contrary to the above, on October 17, 2023 and October 19, 2023, Constellation failed to control transient combustible materials by OP-AA-201-009.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.



Revised

Enforcement

Violation: On October 17 and October 19, 2023, the Licensee failed to control transient combustible materials by OP-AA-201-009 as required, in part, by Condition 2.E of the Operating License for Licensee Nuclear Power Plant.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Radiation Protection Inspection Program Update

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Radiation Protection and Consequence Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

November 19, 2025

Radiation Protection Inspection Program Updates

- Agenda (20 minutes)
- Updates to the inspection procedures used to assess performance in the occupational and public radiation safety cornerstones
- Updates to the significance determination process (SDP) documents
 - Revisions to SDPs methodologies
 - Addition of more-than-minor (MTM) screening guidance
- Drivers for Change
- Program-wide initiatives
- Executive orders
- Inspection program feedback

Radiation Protection Inspection Program Updates continued

- Overview of Changes

Note – these draft changes are subject to revision as they are finalized

- Inspection
 - ~30% reduction in planned inspection effort (previous annualized minimum/maximum: 101/130 hours is now 70/86 hours)
 - New inspection procedures (outage procedure and onsite/remote inspections)—reduces number of site visits during an inspection cycle
 - Selected changes to inspection guidance (e.g., ALARA, Part 37 etc.)
 - Consideration of current licensee information to modulate inspection effort
 - Gradual adoption of this approach—starting with currently identified situational inspections
- SDP
 - MTM guidance/threshold
 - SDP revisions – Remove ALARA leg of Occupational Radiation Safety SDP, align public radiation safety SDP thresholds with enforcement policy



Radiation Protection Inspection Program Updates continued

Inspection Procedures

- IP 71125 Series will replace IP 71124
 - IP 71125 – “Radiation Safety – Public and Occupational”
 - General inspection guidance but contains no inspection requirements
 - IP 71125.01 – “Radiological Performance - Refueling Outage”
 - IP 71125.02 – “Radiological Performance - Remote Inspection”
 - IP 71125.03 – “Occupational Radiation Safety – On-site Inspection”
 - IP 71125.04 – “Public Radiation Safety – On-site Inspection”
- Triennial Frequency except for outage inspection (IP 71125.01)

Radiation Protection Inspection Program Updates continued

IP 71125.01 – Radiological Performance – Refueling Outages

- * Inspections should be performed during a refueling outage. When appropriately risk-informed samples are not available for inspection follow completion guidance of IMC 0306 section 06.08.f.3.

Sample Requirements		Minimum Baseline Sample Completion Requirements		Budgeted Range	
Sample Type	Section(s)	Frequency	Sample Size	Samples	Hours
Radiological Hazard Assessment	03.01	Outage*	1 per site	1 per site	42 +/- 4 per site
Instructions to Workers	03.02	Outage*	1 per site	1 per site	
Contamination and Radioactive Material Control	03.03	Outage*	1 per site	2-3 per site	
Radiological Hazards Control and Work Coverage	03.04	Outage*	3 per site	3-5 per site	
High Radiation Area and Very High Radiation Area Controls	03.05	Outage*	2 per site	2-5 per site	
Radiation Worker Performance and Radiation Protection Technician Proficiency	03.06	Outage*	1 per site	1 per site	
Temporary Ventilation Systems	03.07	Outage*	1 per site	1 per site	
Use of Respiratory Protection Devices	03.08	Outage*	1 per site	1 per site	

Requirement language largely unchanged (few exceptions). Current requirements were established following significant staff effort during the previous revision.

Risk-informed, performance-based inspection. Refueling outages are the periods of most radiological risk at a nuclear facility. No additional inspections will be done during outages.

Radiation Protection Inspection Program Updates continued

• IP 71125.02 – Radiological Performance – Remote Inspection

Sample Requirements		Minimum Baseline Sample Completion Requirements		Budgeted Range	
Sample Type	Section(s)	Frequency	Sample Size	Samples	Hours
Source Term Characterization	03.01	Triennial	1 per site	1 per site	36 +/- 4 per site
Internal Dosimetry	03.02	Triennial*	1 per site	1-2 per site	
Special Dosimetric Situations	03.03	Triennial*	1 per site	1-2 per site	
Radioactive Effluent Sampling and Analysis	03.04	Triennial	1 per site	1 per site	
Dose Calculations	03.05	Triennial	1 per site	1-3 per site	
Abnormal Discharges	03.06	Triennial*	1 per site	1-3 per site	
Radiological Environmental Monitoring Program	03.07	Triennial	1 per site	1 per site	
GPI Verification	03.08	Triennial	1 per site	1 per site	
Waste Characterization and Classification	03.09	Triennial	1 per site	1 per site	

- *When appropriately risk-informed samples are not available for inspection follow completion guidance of IMC 0306 section 06.08.f.3.
- **03.08** – Clarify intent of this inspection requirement is to verify the industry continues to implement the Groundwater Protection Initiative (see SECY 11-019 and Commissioners' Assistants Note ML12347A290.

Radiation Protection Inspection Program Updates continued

- IP 71125.03 – Occupational Radiation
Safety On-Site Inspection

Sample Requirements		Minimum Baseline Sample Completion Requirements		Budgeted Range	
Sample Type	Section(s)	Frequency	Sample Size	Samples	Hours
Permanent Ventilation	03.01	Triennial	1 per site	1 per site	36 +/- 4 per site
SCBA	03.02	Triennial	1 per site	1-2 per site	
External Dosimetry	03.03	Triennial	1 per site	1 per site	
Instrumentation Walkdown and Observation	03.04	Triennial	3 per site	3-5 per site	
Occupational Calibration and Testing Program	03.05	Triennial	3 per site	3-5 per site	

Radiation Protection Inspection Program Updates continued

• IP 71125.04 – Public Radiation Safety On-Site Inspection

Sample Requirements		Minimum Baseline Sample Completion Requirements		Budgeted Range	
Sample Type	Section(s)	Frequency	Sample Size	Samples	Hours
Effluent Monitoring Calibration and Testing Program	03.01	Triennial	2 per site	2-3 per site	36 +/- 4 per site
Radiological Effluent Walkdowns and Observations	03.02	Triennial	1 per site	1 per site	
Environmental Monitoring Equipment and Sampling	03.03	Triennial	1 per site	1 per site	
Radioactive Material Storage and Control	03.04	Triennial	1 per site	1 per site	
Solid Radioactive Waste System Walk-Down	03.05	Triennial	1 per site	1 per site	
Shipment Preparation and Records	03.06	Triennial	2 per site	1-3 per site	

- **03.01** – High-range effluent monitoring inspection guidance modified to remove inspection of emergency action level (EAL) calculation (Emergency Preparedness Cornerstone item)
- **03.04** – Part 37-related inspection guidance revised
 - Emphasize inspection of material that located outside of the Protected Area;
 - Point to Interim Enforcement Policy (IEP, 89 FR 68083);
 - Specifically exclude items already covered by Enforcement Guidance Memorandum (EGM) 2014-001/IEP unless significant changes that would necessitate reconsideration of the existing enforcement discretion occurred;
 - No longer review the annual access authorization program review, instead discuss performance with licensee staff
- **03.06** – Non-expected package shipments can be inspected either through observation or record review

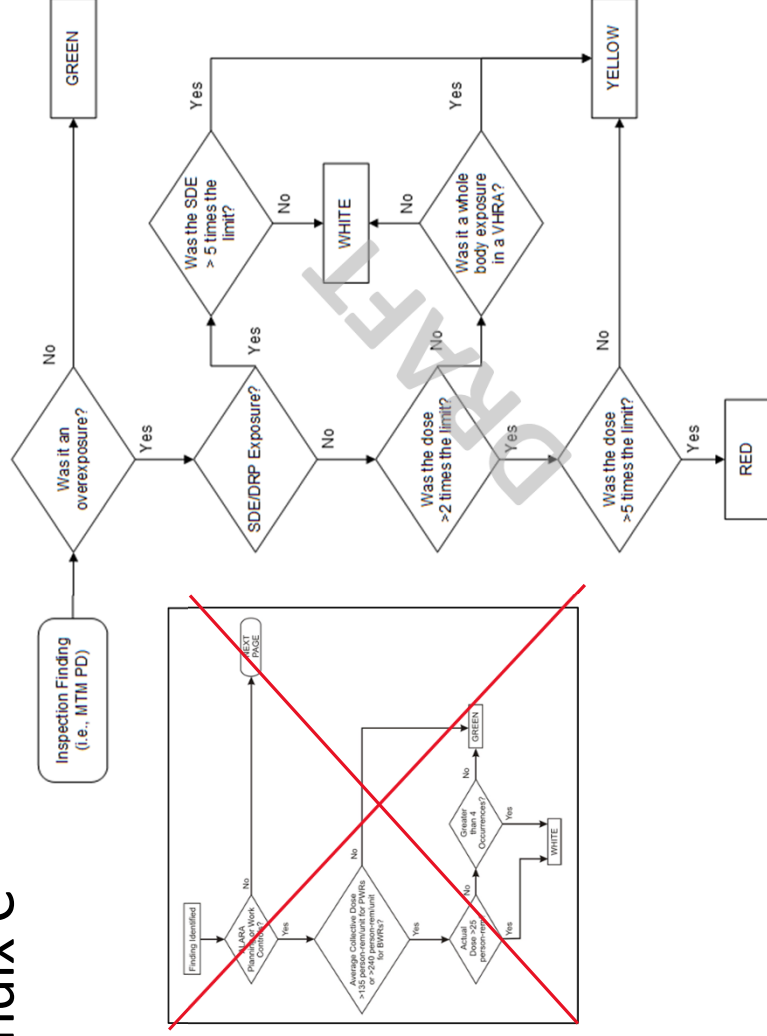
Radiation Protection Inspection Program Updates continued

• SDP Revisions – IMC 0609, Appendix C

A. Did the performance deficiency result in an overexposure (i.e., regulatory dose limit being exceeded) or present a substantial potential for overexposure? ☐ a. If NO, go to II.B ☐ b. If YES, then the PD is more-than-Minor B. Did the PD result in 100 mrem or more of unplanned, unintended dose to a single individual? ☐ a. If NO, go to II.C ☐ b. If YES, then the PD is more-than-Minor C. Did the performance deficiency result in a failure of a radiation protection program barrier? ☐ a. If NO, Stop. PD is Minor. ☐ b. If YES, if any of the following apply, the PD is more-than-Minor; otherwise the PD is Minor.	
Barrier	MTM Criteria
Hazard Identification	In the case of a hazard characterized by an accessible external dose rate of 1,000 mrem/hour or more, or an airborne radiological hazard of 100*DAC or more, did the licensee fail to perform an adequate survey such that the hazard was not identified, or mischaracterized.
Hazard Control	In the case of a hazard characterized by an accessible external dose rate of 1,000 mrem/hour or more, or an airborne radiological hazard of 100*DAC or more, did the licensee fail to implement adequate controls (either physical access controls, work controls, or postings).
Personnel Monitoring	Was there a compromised ability to assess dose, or was monitoring required, but not completed?

*These PDs assume that hazard identification and control are deficient; therefore, the next opportunity for corrective action is the next scheduled survey. These PDs do not account for the next opportunity for corrective action, which is the next scheduled survey. These PDs do not account for a reasonable amount of time between personnel contamination surveys.

More-than-Minor Screening Criteria



Revised Occupational SDP Flowchart

Radiation Protection Inspection Program Updates continued

• SDP Revisions – IMC 0609, Appendix D

A. Did the PD result in a regulatory limit being exceeded?

☐ a. If NO, go to 02.00 B.

☐ b. If YES, then the PD is more-than-Minor

B. Did the PD result in an unplanned/uncontrolled release of radioactive material to the unrestricted area?

☐ a. If NO, go to 02.00 C.

☐ b. If YES, if any of the following apply, the PD is more-than-Minor and should be screened using the appropriate SDP, otherwise the PD is Minor

i) Transportation package breach of a nonexcepted package.

ii) Category 2 or greater Quantity of Radioactive Material as defined in 10 CFR Part 37 is not adequately physically protected in transit.

iii) Category 2 or greater Quantity of Radioactive Material as defined in 10 CFR Part 37 either lost from site or during transit.

iv) Material released (e.g., effluents, contaminated tools etc.) results in a calculated TEDE to a member of the public in excess of 10 mrem.

v) Unclassified disposal of Class C or greater waste, or failure to meet the waste characteristics of 61.56 for all classes of waste

C. Did the PD result in a failure of a radiation protection program barrier?

☐ a. If NO, Stop. The PD is Minor.

☐ b. If YES, if any of the following apply, the PD is more-than-Minor and should be screened using the appropriate SDP, otherwise the PD is Minor

i) Substantial failure of the effluent program as defined in Section 02.01

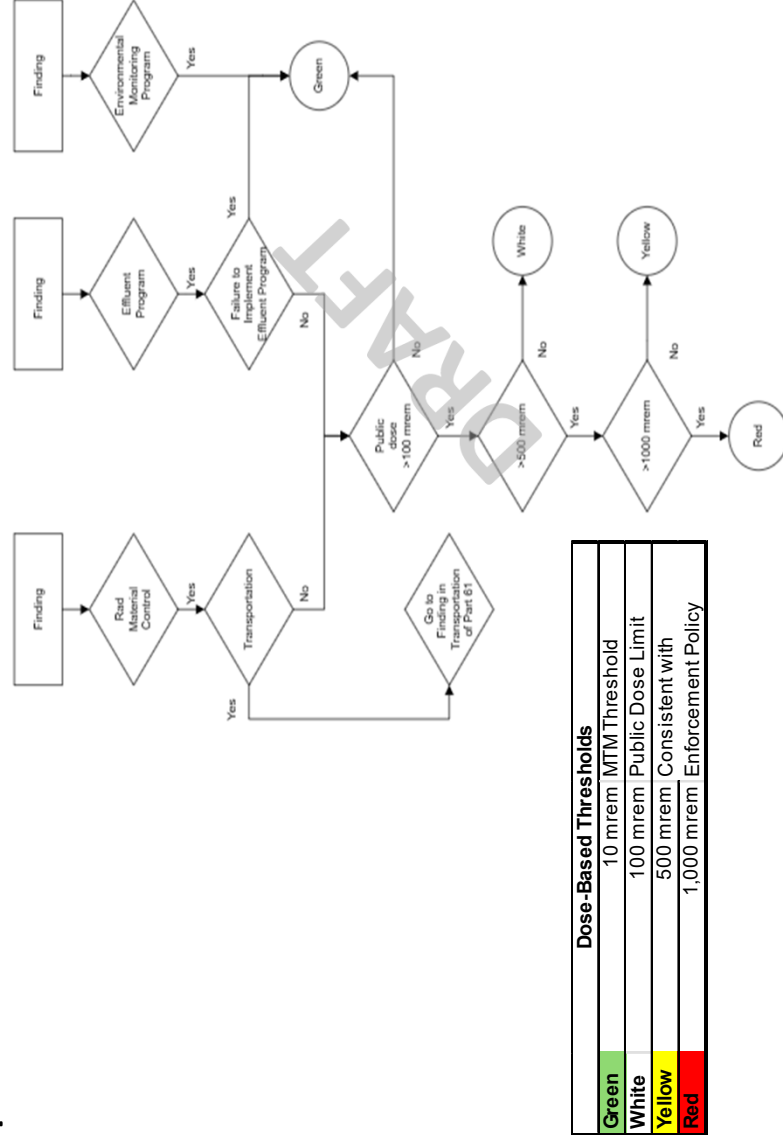
ii) Failure to perform environmental monitoring of an exposure pathway if the pathway contained radioactivity or radiation levels that exceeded the dose limitations reflected in the licensee's effluent technical specifications

iii) Incorrect packaging used for nonexcepted transportation package

iv) Failure to provide vital communication, information, or notification requirements as defined in Section 02.04

v) Physical security deficiency associated with Category 2 or greater Quantity of Radioactive Material as defined in 10 CFR Part 37, that is stored outside of the security protected area

More-than-Minor Screening Criteria



Revised Public SDP (Fig 1) Flowchart

Update on the Differing Professional Opinions Process

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Concerns Resolution Branch
Office of Enforcement

Performance Indicator Discussion and Next Steps

Nuclear Energy Institute

Overall Baseline Inspection Program Update

Phil McKenna, Director
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

Timeline

Date	Milestone
September thru December 2025	Development, Regional Review, and Issuance of Revised Inspection Manual Chapters (IMCs) and Inspection Procedures (IPs)
October November 2025	SECY to the Commission
November 2025	Develop Transition Plan for implementation later than January 1, 2026
November 19, 2025	ROP Bi-Monthly Meeting
December 2-4, 2025	Inspector training at December Inspector Counterpart Meetings
December 2025	Inspector Training on Revised Documentation of Green Findings and Refresher on 2025 ROP Revisions
January 2026	Inspector Training on Revised ROP Baseline Inspection Program and Finding Screening More-than-Minor Criteria
January 29, 2026	ROP Bi-Monthly Meeting
January 1, 2026 After Commission SECY SRM	Issue Revised IPs for the Baseline Inspection Program go into effect (pending Commission approval of Revised ROP)

Completion of 2025 ROP Baseline Inspection Program Guidance

- Acting DRO Director will discuss the guidance.

Baseline Inspection Program Transition in 2026

- **Resident Inspector Baseline IPs:** Resident inspectors should complete ROP inspection activities using currently approved inspection procedures (IPs) at the minimum sample size. The limited exceptions include IP 71111.06, “Flood Protection Measures”; IP 71111.07, “Heat Exchanger/Sink Performance”; IP 71111.12, “Maintenance Effectiveness”; and IP 71111.18, “Plant Modifications; and IP 711151, “Performance Indicator Verification.”
- **PI&R Inspection:** All scheduled biennial problem identification and resolution (PI&R) team inspections should be deferred for the first half of the calendar year 2026. If the Commission does not approve moving the biennial PI&R team inspection into inspection manual chapter (IMC) 2515, “Light Water Reactor Inspection Program Operations Phase,” Appendix C, “Special and Infrequently Performed Inspections,” the biennial PI&R team inspections should be rescheduled and conducted after July 1, 2026 using the currently approved IP 71152, “Problem Identification and Resolution (PI&R).”

Baseline Inspection Program Transition in 2026

- **Engineering Inspection:** All engineering inspection activities planned in calendar year 2026 should be completed as scheduled using the currently approved engineering inspection procedures. For licensees that have a Comprehensive Engineering Team Inspection (CETI) scheduled, the Regions should reduce the inspection scope to three inspectors and complete as many inspection samples as possible with a goal of completing the minimum inspection effort. If the minimum CETI inspection size is not met at a site and the Commission does not approve the proposed revised engineering inspection program, schedule the remaining CETI engineering inspection activities for completion in Calendar Year 2026.
- **Security Inspection Program:** With the exception of IP 71130.03, “Contingency Response – Force-on-Force testing” and IP 71130.10, “Cybersecurity,” reschedule all first quarter 2026 security inspections for the second quarter of 2026 or later, if possible or unless a licensee specifically requests the IPs be conducted in the first quarter 2026. If the Commission does not approve the proposed revised security inspection program by April 1, 2026, use the currently approved security IPs for the remainder of the calendar year.

Baseline Inspection Program Transition in 2026

- **Emergency Preparedness (EP) Inspection Program:** EP IPs should be implemented as scheduled and written. If desired, Regions may defer IP 71114.06, “Drill Evaluation,” until after July 1, 2026. If the Commission does not approve the proposed EP program, resident inspectors can complete the required IP 71114.06 inspection samples during the 2nd half of calendar year 2026.
- **Radiation Protection Inspection Program:** Radiation protection (RP) IPs should be implemented as scheduled and written, with the following additional guidance:
 - Prioritize completion of IP 71124.01, “Radiological Hazard Assessment and Exposure Controls,” during refueling outages.
 - For the following two IPs, during inspection preparation, if a risk-informed inspection sample is not available for inspection, that inspection requirement should be marked complete per Section 06.08 paragraph f.3 of IMC 0306, “Planning, Scheduling, Tracking and Reporting of the Reactor Oversight Process (ROP)” and the scope and duration of the inspection is to be reduced commensurately:
 - IP 71124.04, “Occupational Dose Assessment” sections 03.03, and 03.04
 - IP 71124.06, “Radioactive Gaseous and Liquid Effluent Treatment” section 03.04
 - If desired, the following three IPs can be performed remotely:
 - IP 71124.04, “Occupational Dose Assessment” sections 03.01, 03.03, and 03.04
 - IP 71124.06, “Radioactive Gaseous and Liquid Effluent Treatment Occupational” sections 03.02, 03.03, and 03.04
 - IP 71124.07, “Radiological Environmental Monitoring Program” sections 03.02, and 03.03
 - For IP 71124.08, “Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation Requirement” section 03.04, if an inspection sample is not available for assessment during the inspection, then the requirement shall be marked complete per IMC 0306, Section 06.08 paragraph f.4.

Questions and Discussion on the Revisions to the ROP Baseline Inspection Program