

NRC INSPECTION MANUAL

IROB

MANUAL CHAPTER 1120

PRELIMINARY NOTIFICATIONS

1120-01 PURPOSE

To provide instructions regarding the prompt dissemination of information about significant events occurring at facilities or relating to activities licensed by the Commission or an Agreement State.

1120-02 POLICY

02.01 Implementation. Oral and/or written preliminary notifications (PNs) will be made for all matters that meet the criteria specified in this manual chapter (see Sections 1120-07 and -08 below). To avoid duplication of reports, PNs should normally address the more significant events that warrant immediate attention of upper management and should supplement existing event reports. When an Event Notification (EN) has been issued to document a report to the Headquarters Operations Center, another report (i.e., PN or Morning Report) will not be issued to report the same information. Morning Reports are intended to address those events or situations considered routine or of lesser significance where immediate attention of upper management is not required.

02.02 Issuing office. A written PN will be issued by the NRC regional or headquarters office that received information about an event. Regional offices usually will have jurisdiction over the issuance of PNs for events occurring in the regions, including events that are first reported to the Headquarters Operations Officer. The text of the PN will be created using WordPerfect or other available software (see ADAMS Desk Reference Manual for acceptable software). The issuing office will add the PN to ADAMS in a pre-determined subdirectory. They will also provide the document information to the Document Processing Center in the Office of the Chief Information Officer (OCIO) via electronic distribution, for secondary processing. The issuing office will be responsible for electronic dissemination of the PN using the distribution list provided by OCIO.

1120-03 OBJECTIVES

The objectives of the oral and written PN system are as follows:

- a. To promptly provide to the Commissioners and other NRC and Agreement State management new and current information on matters that are of significant safety or safeguards concern or have, or potentially could have, high public interest.
- b. To provide to others in the NRC and the Agreement States on a less urgent basis, information on matters that are the subject of PNs.

1120-04 DEFINITIONS

Oral and Written Preliminary Notification (PN). An early notice of an event of possible safety or safeguards significance or of high public interest; information presented is as initially received without complete verification or evaluation and is essentially all that is known at the time notification is made. Oral notification during a conference call is also known as a Commissioners' Assistants Briefing, and is always followed up with a written PN.

1120-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Regional Administrators or Designees

- a. Evaluate data received in the regional office to determine if the criteria for oral and/or written PNs have been met.
- b. Assure that during normal duty hours adequate consultation is made with the appropriate NRC headquarters (HQ) office regarding the need for a telephonic notification before issuing the written PN.
- c. Assure, when practical and appropriate, that the accuracy of technical information included in the written PN has been confirmed with licensee management before the PN is issued. Also assure, when practical and appropriate, that all written PNs containing information relevant to radiation exposure of licensee employees or of the public are reviewed for technical accuracy by regional management staff having responsibility for the radiation protection inspection program.
- d. Approve PNs prior to issuance.
- e. Assure that written PNs are promptly distributed electronically to designated offices (See Section 1120-11).
- f. Promptly inform by telephone call the appropriate HQ office(s), such as Nuclear Reactor Regulation (NRR), Nuclear Materials Safety and Safeguards (NMSS), Nuclear Security and Incident Response (NSIR), Public Affairs (OPA), State and Tribal Programs (STP), etc., of the most significant matters that are the subject of PNs issued by the Regional Office. When the matter has radiological significance, contact the Radiation Protection Program Office in each affected State.

- g. Make oral notification of significant matters or assure that a conference call is established with the Headquarters Operations Officer. (See Section 1120-08)

05.02 HQ Office (NMSS or NRR) Directors, or Designees

- a. Promptly inform the appropriate regional and HQ offices orally of significant matters that are the subject of PNs, for those cases in which a HQ office is the issuing office. When the matter has radiological significance, contact the Radiation Protection Program Office in each affected State. As appropriate and when practical, assure that the accuracy of technical information included in the written PN has been confirmed with licensee management before the PN is issued.
- b. Prepare, approve, and promptly distribute PNs electronically that are to be issued by HQ within its programmatic areas (See Section 1120-11).
- c. When the HQ office is most knowledgeable on a subject, provide special guidance to the regional offices upon issuing the PNs.
- d. Make oral notifications of significant matters or assure that a conference call is established with the Headquarters Operations Officer (See Section 1120-08).
- e. Maintain awareness of significant matters described in PNs.
- f. Evaluate the performance of regional offices in the implementation of this inspection manual chapter.
- g. Promptly re-distribute PNs issued by regional offices, once PNs are received (See Section 1120-11).

05.03 Headquarters Operations Officer (HOO)

- a. Sets up and conducts Commissioners' Assistants briefing, if requested.

05.04 HQ Office of the Chief Information Officer (OCIO)

- a. Post publicly available nonsensitive PNs to the public web site.
- b. Setup and maintain a link (via the sites Electronic Reading Room) for each publicly available nonsensitive PN to the actual publicly available PN in the ADAMS public library (PARS).
- c. Maintain PN distribution list.

1120-06 NUMBERING OF WRITTEN PRELIMINARY NOTIFICATIONS

Each written preliminary notification is designated by an alphanumeric code specifying the issuing organization (I, II, III, IV, H or IIT), the year of issuance, and the sequential number of the PN in that year. Thus, PNO-II-93-03 is the third written preliminary notification of an

event or unusual occurrence issued by Region II in 1993. The designation H is for Headquarters and IIT is for Incident Investigation Team (NUREG-1303).

If subsequent written PNs are to be issued to update or correct a previously issued PN, the original written PN number is retained and a letter added to the end of the number to indicate the supplement. For example, PNO-IV-93-02B is the second supplement of PNO-IV-93-02.

1120-07 CRITERIA FOR ISSUING A WRITTEN PRELIMINARY NOTIFICATION

Written PNs shall be issued for (but shall not necessarily be limited to) the types of incidents, events and occurrences described below:

- a. Events which prompt a licensee to declare an alert, site area emergency or general emergency; and unusual events which may be of significant interest to the news media, government or the public.
- b. Any situation which results in significant personnel contamination, or significant contamination event requiring a special inspection or Augmented Inspection.
- c. Occupational dose or probable occupational dose in excess of the limits in 10 CFR 20.1201, 20.1206, 20.1207 and 20.1208.
- d. A public dose or probable public dose in excess of the limits in 10 CFR 20.1301.
- e. Significant transportation incidents such as those involving significantly damaged, leaking or lost Type B or fissile packages or those involving high public interest (i.e., major highway closed, etc.)
- f. Serious natural occurrences and their effects, such as anticipated or actual shutdown of a power or research reactor because of drought, flooding, hurricane, or icing; assessment of the effects of earthquakes or tornadoes at or near licensed facilities, even when no major damage was done; major damage to licensed facilities resulting from natural occurrences.
- g. Significant environmental events such as releases immediately reportable under 10 CFR 20.2202 or events which violate NRC or Agreement State regulatory requirements.
- h. Fires or explosions that (1) affect safety-related equipment, (2) cause damage to nuclear power plants or other licensed facilities resulting in a shutdown for more than 2 days, (3) would be expected to cause such a shutdown if the plant were in operation, or (4) result in construction delays of more than 1 month.
- i. Significant operational events or equipment problems. At non-reactor sites, this includes events such as significant safety equipment failures during operations, damage to portable gauges resulting in unshielded sources, ruptured well logging sources, etc. At nuclear power plants, this includes events such as activation of

the ECCS, abnormal depressurization, pipe breaks or leaks, malfunction of relief valves resulting in pressure transients, or failure of diesel generators, which would cause or are expected to cause plant shutdown in excess of 3 days or which would be expected to cause such shutdown if the plant were operating. [Extensions of plant outages to perform testing and maintenance activities unrelated to the event that prompted the shutdown, or outages caused by balance-of-plant equipment problem with no direct regulatory (or operational safety) implications, do not require the issuance of a PN.] Additional guidance pertaining to significant operational events may be found in Inspection Procedure 71153, "Event Follow-up," and Management Directive 8.3, "NRC Incident Investigation Program," and IMC 0309, "Reactive Inspection Decision Basis For Reactors."

- j. Initial criticality at a nuclear plant.
- k. Any operational problem concerning reactivity, such as inadvertent criticality or significant abnormal flux distribution. For fuel cycle facilities, this includes any significant loss of criticality safety controls.
- l. Events of security significance directed toward or occurring within NRC or Agreement State licensed facilities or information concerning threats to licensees such as: actual or apparent breaches of security systems, actual or threatened sabotage, malicious mischief or vandalism, bomb threats, arson, theft, discovery or discharge of firearms, demonstrations resulting in arrests or violence.
- m. Reported inventory differences (ID), as follows:
 - 1. for licensees subject to 10 CFR 70.51(e), ID that exceed both 300 grams of U-235 and 1.5 times the prescribed limit of error of inventory differences (LEID);
 - 2. for licensees subject to 10 CFR 74.31, ID that exceed the licensee's detectable threshold value;
 - 3. for licensees subject to 10 CFR 74.51, ID that exceed both 300 grams of U-235 and 3 times the standard error of inventory differences (SEID).
- n. Lost or stolen licensed material immediately reportable under 10 CFR 20.2201 when the material poses a significant safety hazard, generates high public interest, or involves radioisotopes and activities of concern for a radiological dispersal device (RDD). A PN is not required for lost or stolen portable moisture density gauges, gas chromatographs, static eliminators, explosive/chemical agent detectors, and other devices posing a low safety hazard.
- o. Strikes of employees at any major licensed facility; strikes of security guards or honoring of picket lines by these employees; or strikes of craft employees at plants under construction which result in violence, damage, or a construction delay of more than 1 month.

- p. Deficiencies in design and construction of nuclear facilities that are reported to have the potential for construction delay of more than 1 month.
- q. An event at an NRC or Agreement State licensed facility (including facilities issued a construction permit) that results in a serious injury to a contaminated person or a fatality. A PN is not appropriate for serious injuries involving uncontaminated persons.
- r. Other significant events related to licensed activities in which national, state, or local news media interest already exists, or as deemed appropriate when media interest is expected but not certain, as well as updated information on events related to licensed activities that have previously attracted media attention.
- s. Significant legislative actions or court decision negating regulations or regulatory actions issued by the NRC or an Agreement State. Generally, a PN is not appropriate for new or revised actions by other government agencies affecting NRC, Agreement States, or licensees.
- t. Significant fitness-for-duty events reportable under 10 CFR 26.73.
- u. Significant medical events reported under Subpart M of Part 35.

It should be noted that allegations are not appropriate subjects for PNs.

1120-08 CRITERIA FOR TELEPHONE CONFERENCE CALL NOTIFICATION (Commissioners' Assistants Briefing)

08.01 During normal duty hours only the most noteworthy events of the types listed in Section 1120-07 warrant a conference call notification. The decision to do so will usually depend on the speed with which the event is breaking compared to the time it could take to prepare and dispatch a written PN. During other than normal duty hours, the threshold for oral notifications may be somewhat lower simply because the information received concerns a matter that must be promptly brought to the attention of NRC upper management before a written PN can be prepared and dispatched upon resumption of normal duty hours.

08.02 The decision concerning oral notifications for events will usually be made by the responsible issuing regional administrator or HQ office director (or designees) during normal duty hours, and by the emergency officer (in consultation with the cognizant Regional Duty Officer) during other than normal duty hours.

08.03 The conference call for the Commissioners' Assistants Briefing should include the following or their designees and may include others, as appropriate.

- Regional Duty officer
- Emergency Officer (NRR or NMSS)
- Director, Office of Nuclear Reactor Regulation
- Director, Office of Nuclear Security and Incident Response

Director, Nuclear Material Safety and Safeguards
Commissioners' Assistants
Executive Director for Operations
Director, Office of Public Affairs
Director, Office of Congressional Affairs
Director, Office of State and Tribal Programs
Director, Office of International Programs

1120-09 FORMAT OF WRITTEN PRELIMINARY NOTIFICATION

09.01 General. The format and content of a written PN are shown in Exhibit 1. To facilitate the preparation of a PN and to have a consistent format for electronic transmission and ultimate processing by recipients, the issuing office will use WordPerfect or other available software (see ADAMS Desk Reference Manual for acceptable software) and the ADAMS template NRC-004 (available in ADAMS ML031150184) "NRC Preliminary Notifications (PNOs)." Each issuing office shall track and maintained their perspective numbering systems (see Section 1120.06).

09.02 Specific Parts of Preliminary Notification. The following is a description of each part of the PN:

- a. The heading "PRELIMINARY NOTIFICATION" must be included at the top of the page.
- b. Date of issuance.
- c. PN number (see Section 1120.06)
- d. An introductory, boilerplate statement must be included in all PNs as follows:

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. The information is as initially received without verification or evaluation, and is basically all that is known by the Region staff on this date.

- e. Facility - Identify the facility, its location (city/state) and the licensee.
- f. Subject - Enter a brief, one-line description of the matter.
- g. Report Content - The body of the PN contains a brief factual description of the problem or event including the time and date of occurrence, and plant, buildings, areas or systems affected by the occurrence. The PN also should describe any controls, protective measures and/or plan of action employed or immediately initiated to minimize the magnitude of the event or its effects. The accuracy of technical information should be confirmed with the licensee's plant management when practical, particularly when the information was not initially obtained from the licensee plant management. PNs should avoid speculation, or should specifically identify speculative statements when their use is considered necessary.

Recognizing the balance that must be made between promptness of issuance and depth of detail, attempt to include the following when applicable:

1. Radionuclides of concern
2. Actual or estimated quantity of release
3. Dose estimate, dose rate estimate, percentage of Technical Specifications (TS) or 10 CFR 20 limit, or some other means of interpreting the significance of the release or exposure
4. Areas involved (restricted, unrestricted, or owner controlled).

If the licensee or the NRC plans to issue or has issued a press release, so state. The PN should not contain negative statements such as "no media interest is expected."

If media inquiries have been made, the PN should so state.

When reference is made to a regional office, that office should be identified by location as well as by number the first time it is used in each PN.

PNs should not include the names of licensee employees; rather, the title of individuals should be used when it is necessary to specify an individual. An exception to this is when individual names are important to the notification and the names have previously been provided to the public.

PNs must not contain any information exempt from disclosure under 10 CFR 95 such as classified, proprietary, safeguards or Privacy Act information.

If State Program Offices or other affected organizations have been notified, identify the states or organizations and the method of notification.

If the PN contains all the pertinent information expected to be received regarding the matter being reported and no further action is believed necessary, then the PN should contain a statement similar to the following:

This preliminary notification is issued for information only and no further action by the staff is anticipated.

The closing paragraph of the body of the PN must contain information regarding the time and manner of receipt of information. A standard sentence similar to the following should be included in each PN:

Region ____ received initial notification of this occurrence by ____ (the means of notification, that is, letter, telegram, or telephone call) from ____ (source of information) at (time and date). The information presented herein has been discussed with the licensee, and is current as of ____ (time and date).

- h. ADAMS Accession Number (ML# from the Main library) |
- i. Contact - The PN should include the names, email addresses, and telephone numbers of individuals who can supply additional information if needed. Two contacts are normally listed. |

1120-10 ACTIONS FOLLOWING RECEIPT OF INFORMATION

10.01 Normal Duty Hours. After information about an event of the type described in 1120-07 (or of like significance) is received by a region, prompt consideration is given to the necessity for a Conference Call (see Section 1120-08). If Conference Call Notification is likely, the regional administrator (or designee) recommends to the appropriate HQ office director (or designee) that such notifications be made. The office director ensures that required Conference Call is made promptly (normally within 1 hour after receipt of the initial report), either by assuming responsibility for making the necessary notifications or by requesting the appropriate region to make the notifications.

When information about an event is first received by the Headquarters Operations Officer (HOO) rather than by a region, the HOO reports the event to the cognizant Regional Duty Officer (RDO) and the HQ Emergency Officer (EO), as appropriate. The event is evaluated and a decision regarding telephonic notification is made by the EO in accordance with 1120-08. The telephonic notification briefing is set up by the HOO, if requested to do so (see Section 1120-08.03).

Following the above decision (and action if required) concerning telephonic notification, a PN is prepared and electronically dispatched, normally within 2 hours after receipt of the initial information.

10.02 Other than Normal Duty Hours. Information about a significant event received during other than normal duty hours will most likely be reported initially to the HOO who in turn reports the event to the cognizant RDO and the EO, as appropriate. The event is evaluated and a decision regarding telephonic notification is made by the EO in accordance with 1120-08. The telephonic notification briefing is set up by the HOO if requested to do so (see Section 1120-08.03).

The appropriate regional administrator or HQ office director (or their designees), ensures that information received during other than normal duty hours concerning events which meet the PN criteria is later disseminated by PN. These PNs should be dispatched electronically within about 2 hours after resumption of normal duty hours, or sooner if conditions warrant.

10.03 The appropriate regional administrator or HQ office director (or their designees) notifies the Office of Public Affairs and the Office of State and Tribal Programs by telephone when a PN is being issued that has direct or indirect connection with Agreement States and that involves radioactive materials (primarily exposures, transportation accidents, theft of sources, etc.). Note that there is a 48 hour (2 business days) delay for agreement state ENs and PNs. Information pertaining to this requirement can be located in STP-02-047 (available in ADAMS ML021650172), dated June 13, 2002. |

10.04 If the NRC enters the Standby, Initial Activation or Expanded Activation Modes of the NRC Incident Response Plan, only an initial PN is issued. Status Summary reports are issued in lieu of PNs until a return to the Normal Mode occurs. Status Summary reports are distributed to the NRC offices via the E-Mail system. A final PN is issued to note the disposition of the NRC response.

1120-11 DISPATCH OF PRELIMINARY NOTIFICATIONS

11.01 The issuing office shall dispatch PNs electronically. The distribution consists of 3 parts; a basic distribution required for all PNs (list maintained by OCIO), a supplementing distribution required by the issuing organization (maintained by the issuing organization), and the PN specific requirements, also established by issuing organization. Anyone on the distribution list who believes that a PN has been issued, but has not received it, should call the appropriate coordinator to determine if the contact has received a copy and, if necessary, arrange to get a copy. Each Office is responsible for notifying OCIO of any changes to the basic list. The above is to provide a minimum required distribution; further distribution by any of the above recipients is anticipated.

11.02 If there is a failure of the E-Mail system that prevents the transmission of a PN, the issuing office should transmit the PN by facsimile to the Operating Experience Section (OES) in NRR and NSIR (Operations Center). After completing the facsimile transmission, a phone call should be made by the issuing organization to the contacts listed for the Operations Center, NRR, and NMSS (when the PN is for a materials licensee). The time these calls were completed should be recorded on the retained hard copy. These phone calls will alert the Headquarters staff that a PN was sent and verify that the PN was received. The contacts will assist by dispatching PNs to the Headquarters Offices identified on the basic distribution list until equipment problems have been corrected. Copies will be hand carried by the Operations Center to the EDO's office and to the mailroom of the Office of the Secretary for distribution to the Commission. The Operations Center should provide a copy to the Director, NSIR.

11.03 An example of the basic distribution list that shall be utilized by the issuing office for all PNs is provided in Exhibit 2. Each region should supplement this distribution by making direct distribution to others to satisfy regional or PN specific needs. As changes occur in coordinators, please contact OCIO . OCIO will update the distribution list and make copies available to the regions and Headquarters (available in ADAMS ML003736389).

1120-12 SUPPLEMENTAL PRELIMINARY NOTIFICATION

Supplemental PNs normally are issued only when it is necessary to promptly notify the Commission and other NRC management of additional or corrected information relating to a significant matter previously described in a PN. This may occur, for example, if the situation previously described in a PN worsens significantly or if the information in a PN is determined to be incorrect. A Morning Report should be used to supplement a PN when the new information alone does not warrant issuing a PN supplement.

1120-13 DISPOSITION OF MATTER PRESENTED IN PRELIMINARY
NOTIFICATIONS

PNs need not contain sufficient information to close a matter. Also, it is not necessary that the resolution of a matter be reported through the issuance of subsequent PNs. The tracking of matters described in PNs to ensure appropriate resolution is accomplished through handling of licensee reporting and followup inspections.

1120-14 REVIEW OF ALL PNs FOR ABNORMAL OCCURRENCE REPORTING

NRC Headquarters and regional staffs responsible for issuing PNs shall review the events described in each PN against the criteria contained in Management Directive 8.1, "Abnormal Occurrence Reporting Procedure," and take the prescribed actions for those events meeting the criteria.

END

Exhibits:

1. Example of a Preliminary Notification
2. Example of Standard Distribution List

EXAMPLE

January 7, 1994

PRELIMINARY NOTIFICATION OF EVENT OR UNUSUAL OCCURRENCE

PNO-II-93-076B

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. The information is as initially received without verification or evaluation, and is basically all that is known by the Region II staff on this date.

<u>Facility</u>	<u>Licensee Emergency Classification</u>
Duke Power Co.	<input type="checkbox"/> Notification of Unusual Event
McGuire 2	<input type="checkbox"/> Alert
Cornelius, North Carolina	<input type="checkbox"/> Site Area Emergency
Dockets: 50-370	<input type="checkbox"/> General Emergency
	<input checked="" type="checkbox"/> Not Applicable

Subject: UPDATE - SWITCHYARD INSULATOR FAILURE LEADING TO LOSS OF OFFSITE POWER

McGuire Unit 2 declared an unusual event on December 27, 1993, due to a loss of offsite power and subsequent safety injection. An Augmented Inspection Team (AIT) was dispatched to the site on December 29, and a Confirmation of Action Letter (CAL) was issued to Duke Power Company on December 29, 1993.

The AIT leader held an exit meeting with the licensee on January 5, 1994, in Washington, D. C., and conducted a press conference on January 6, 1994.

The licensee's corrective actions were sufficiently comprehensive to resolve the problems identified by the Augmented Inspection Team. A restart meeting was held among the licensee, Region II, Atlanta, GA, and NRR on January 5, 1994, to satisfy the requirements of the CAL.

Based on the AIT findings, verification of the completion of the licensee's corrective actions by the Resident Staff, reviews made by NRR and discussions during the restart meeting, the Regional Administrator has concurred in the restart of McGuire Unit 2. The unit is currently at 50% power. Region II received initial notification of this occurrence by a telephone call from the licensee at 22:22 (EST) on December 27, 1993. The information presented herein has been discussed with the licensee, and is current as of 8:00 a.m., January 7, 1994.

This preliminary notification is issued for information only and no further action by the staff is anticipated.

ADAMS Accession Number: ML123456789

| Contact: K. Gray
| (301) 415-1166
| Kag@nrc.gov

EXAMPLE

PRELIMINARY NOTIFICATION (PN) STANDARD DISTRIBUTION LIST

PN RECIPIENT LIST

acrspn	MWW	Maggalean Weston
chmnpn	TLA	Terry Agneu
diazpn	RKD	Roger Davis
edopn	CEJ	Cathy Jaegers
merrpn	LPP	Lorna Pini Kipfer
mcgafpn	JAL	Judy Ledbetter
nmsspn	CJP2	Cathy Poland
nrrpn	PN1	Kathy Gray
nsirpn	MFW	Mike Weber
ocapn	NDB2	Nancy Belmore
oepn	SLF	Sandra Figueroa
ogcpn	TMM	Terry Mayberry
oigpn	AXP	Alicia Penaherrera
oippn	AVL JMW1	Vicki Lewis Jeannette Whitaker
rds pn distribution	DTK	Dan Kube [contractor]
respn	MEM2	Mike Mayfield
ripn	CMY	Connie Yusko
riipn	MLH	Melba Hawkes
riiipn	BAB1	Bruce Berson
rivpn	JAC1	Jo Carson

| secypn RIDSSECYMAILCENTER
|
| OPA
| STPMAIL
| WEBWORK email publicly available nonsensitive PN **ML#** [from PARS availability] with
| PNO document date, licensee/facility, subject/title of PN [do not email WP file]