

## IMC 0612 Appendix D –Documenting Problem Identification and Resolution Biennial Team Inspections (71152B)

At the completion of biennial team inspection, the inspection team shall document their assessment of the licensee's Problem Identification and Resolution (PI&R) programs. This assessment should consider activities that were not only observed during this inspection but should more broadly consider previously documented inspection activities that occurred since the last biennial team assessment as they relate current licensee performance.

The inspection team shall document an assessment of the licensee's performance in the following areas:

1. The effectiveness of the corrective action program which includes problem identification, problem prioritization and evaluation, and corrective actions
2. The use of operating experience
3. Completed self-assessments and audits
4. *The health of the licensee's Safety Conscious Working Environment (SCWE) which includes any underlying factors that would produce a reluctance to raise nuclear safety concerns or prohibit the free flow of information. [C1]*

Note: The assessment of the licensee's SCWE should be based on the results of the biennial inspection interviews of plant staff and any relevant insights obtained from the review of the licensee's most recent safety culture and other relevant assessments.

Unlike other baseline inspection procedures, (IP) 71152 biennial team inspections seek to assess elements of the PI&R programs that may not rise to the level of ROP findings. Consequently, these inspections may, in some instances, document qualitative observations, minor performance deficiencies, and minor violations. The following guidance supplements that the guidance contained in IMC 0612.

1. The report summary should briefly summarize the assessment conclusions in the areas described above.
2. The inspection report should describe the observations and basis for each assessment conclusion. The report outline below contains the inspection requirements for each assessment area in a logically organized format.  
  
Negative assessment conclusions should be supported by examples performance deficiencies. When documenting such performance deficiencies, the discussion must include a disposition of the performance deficiency consistent with IMC 0612 and the Agency's enforcement process. Other conclusions should be supported by a brief basis statement and should include the scope of material reviewed in reaching the conclusion.
3. Inspection documents reviewed and not listed in the inspection scope must be listed in a report attachment. Listed documents should be logically organized.

## Report Cover Letters

Inspection report cover letter guidance is contained in IMC 0612 Exhibit 4, “Cover Letter Templates.” IMC 0612 Exhibit 4 contains a report cover letter template that can be modified to create a biennial PI&R inspection report cover letter. The cover letter should contain a brief description of the team’s overall conclusion regarding the effectiveness of the licensee’s PI&R programs in each of the areas reviewed and assessed (Corrective Action Program Effectiveness, Operating Experience, Self-Assessment and Audits, and Safety Conscious Work Environment).

## Report Outline:

Note: As appropriate inspectors may combine these three areas into a single writeup\*

### 1. Corrective Action Program Effectiveness

#### a. Inspection Scope

**Problem Identification<sup>1</sup>** – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, the other activities that were competed to determine whether the licensee is identifying problems at the proper threshold and entering them into the corrective action system.

**Problem Prioritization and Evaluation<sup>1</sup>** – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, the other activities that were competed to determine whether the licensee is adequately prioritizing and evaluating problems. Identify the prioritizations and evaluations which were reviewed and were associated with previously documented NRC findings or inspection activities. Include pertinent reference numbers (e.g., condition report numbers, NRC finding numbers).

**Corrective Actions<sup>1</sup>** – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, the other activities that were competed to determine whether corrective actions are effective, timely, and in the case of significant conditions adverse to quality, prevent recurrence. Identify the corrective actions which were reviewed and were associated with previous documented NRC findings or inspection activities. Include pertinent reference numbers (e.g., condition report numbers, NRC finding numbers).

#### b. Assessment

**Problem Identification<sup>1</sup>** – Document a conclusion regarding the licensee’s effectiveness in problem identification. Include the bases for the conclusion. Discuss issues and relevant observations regarding problem identification.

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<sup>1</sup> These three areas may be combined into a single write-up

Problem Prioritization and Evaluation<sup>1</sup> – Document a conclusion regarding the licensee’s effectiveness in prioritizing and evaluating problems. Include the bases for that conclusion. Discuss issues relative to:

- the effectiveness of the licensee’s process for prioritizing problems for resolution,
- technical adequacy and depth of evaluations (including root cause analysis where appropriate),
- adequate consideration of operability and reportability requirements, and
- appropriate consideration of risk in prioritizing or evaluating problems for resolution

Corrective Actions<sup>1</sup> – Document a conclusion regarding the licensee’s ability to develop and implement effective corrective actions. Include the bases for the conclusion. Discuss issues and relevant observations regarding corrective actions, including, for significant conditions adverse to quality, issues associated with corrective actions taken to prevent recurrence

## 2. Use of Operating Experience

- a. Inspection Scope – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, the other activities that were completed to determine whether the licensee appropriately used operating experience information.
- b. Assessment – Document a conclusion regarding the licensee’s use of operating experience information. Include the bases for the conclusion.

## 3. Self-Assessments and Audits

- a. Inspection Scope – Identify the documents that were reviewed, the standards that the licensee was evaluated against, and if applicable, the other activities that were completed to determine whether conducted licensee self-assessments and audits of their corrective action and quality assurance programs appropriately assessed performance and identify areas for improvement.
- b. Assessment – Document a conclusion regarding the licensee’s self-assessments and audits. Include in the conclusion if issues identified by those self-assessments and audits were addressed. Include the bases for the conclusion.

4. Safety Conscious Work Environment

- a. Inspection Scope - *Identify the documents that were reviewed, the standards that the licensee was evaluated against, and as applicable, other activities that were completed such as Employee Concerns Program reviews and employee interviews to assess whether issues exist that may represent challenges to the free flow of information, and to determine whether underlying factors exist that would produce a reluctance to raise nuclear safety concerns. [C1]*
- b. Assessment - *Document the existence of issues that may represent challenges to the free flow of information, and underlying factors that could produce a reluctance to raise nuclear safety concerns. [C1] Based on inspection interviews and insights obtained from safety culture and other relevant assessments, document a conclusion as to whether the conditions at the site were conducive to a Safety Conscious Working Environment.*

Attachment 1 – Revision History for IMC 0612 Appendix D

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Accession Number
	<a href="#">ML031610702</a> 06/24/03 <a href="#">CN 03-021</a>	Initial Issuance		
C1	<a href="#">ML061560471</a> 06/22/06 <a href="#">CN 06-015</a>	PI&R Team Inspection Report format revised to accommodate the safety culture initiative 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	Yes 07/01/2006	<a href="#">ML061570081</a>
	<a href="#">ML111881201</a> 10/28/11 <a href="#">CN 11-024</a>	Relocated example cover letter guidance to IMC 0612 Exhibit 4.	N/A	
	ML12345A022 08/13/13 CN 13-017	Revised to address regional reliability effort change recommendations. Removed sample inspection report for future incorporation into IMC 0612 Exhibit 3.	N/A	<a href="#">ML13052A347</a> FF 0612D-1785, 1827, 1843, 1844, 1845, 1846, 1847