PLANNING, TRACKING AND REPORTING OF THE
REACTOR OVERSIGHT PROCESS (ROP)

0306-01   PURPOSE

01.01   The NRC uses the Reactor Program System (RPS) and the Reactor Oversight Process (ROP) Webpage to support ROP implementation.

   a.   ROP-related data from RPS and other NRC information systems are used for:

      1.   Assisting in official agency record production;

      2.   Developing the ROP Webpage;

      3.   Providing inputs to NRC management decisions; and

      4.   Answering questions that the NRC receives from Congress, the Commission, State officials, interveners, and other stakeholders.

   b.   This manual chapter discusses the following specific areas:

      1.   Inspection Procedure Planning and Frequencies;

      2.   Inspection Procedure Status and Sample Sizes;

      3.   Charging Time for ROP Activities;

      4.   Inspection Report and Item Numbering;

      5.   Entering and Updating Inspection findings in the Plant Issues Matrix (PIM); and

      6.   ROP Web Posting Process and Schedule.

   c.   This manual only provides guidelines for the use of RPS to support ROP implementation, specifically the assessment and inspection activities. If there are specific issues with RPS that need to be resolved, contact the Regional or Office RPS representative prior to sending an e-mail to the RPS Help Desk. The RPS representative will determine if they can solve the issue or if it needs to be escalated to RPS Help.

   d.   This manual does not provide step-by-step instructions. For detailed information on entering and updating RPS data, understanding the computer screen layouts, and creating and printing reports, visit the RPS Help Services Webpage at:

      http://nrr10.nrc.gov/rps/how-do-i

      On the RPS Webpage, users can access the RPS Dynamic Webpage and user guides.

0306-02   OBJECTIVES

02.01   To establish the policy and processes for entering and maintaining data in RPS and other NRC information systems used to support the ROP.

02.02   To help users of RPS and other NRC information systems, as well as NRC management, to understand and use ROP-related information.

02.03   To ensure consistency in the format and content of ROP-related data entered into RPS and other NRC information systems.

02.04   To ensure that the ROP-related data entered into RPS are complete, accurate, and timely for plant assessment and ROP self-assessment.

02.05   To ensure control and access to RPS by program office and regional office users.

0306-03   DEFINITIONS

The terms used in this manual chapter are consistent with the definitions provided in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," and IMC 0612, "Power Reactor Inspection Reports."

03.01 Agencywide Documents Access and Management System (ADAMS). The document management system that the NRC uses to maintain and disseminate official records.

03.02 Direct Inspection Effort (DIE). Time spent conducting an inspection procedure which relates to the Inspection Program Elements (i.e., baseline, supplemental, etc).

03.03 Event Date. The Event Date has the same definition as "Start Date of Findings in the Assessment Program," as described in IMC 0305, "Operating Reactor Assessment Program," Section 11-01 step b. The Event Date for Licensee Event Reports (LERs) is the actual Event Date described in the LER and not the LER issue date. The Event Date is used to assess timeliness goals.

03.04 Inspection Planning Cycle (IPC). The 12-month period from January 1 through December 31 of each year during which inspections are planned and plant performance is assessed.

03.05 Non-Direct Inspection Effort. Time spent supporting an inspection procedure (i.e., preparation, documentation, travel, SDP, etc).

03.06 Plant Issues Matrix (PIM). A consolidated listing of individual plant issues (i.e., inspection findings) related to plant performance as identified in issued inspection reports.

03.07 <u>Reactor Program System (RPS)</u>. A collection of databases that provides an <u>integrated</u> methodology for planning, scheduling, conducting, reporting, and analyzing the reactor inspection functions and activities performed by the NRC regions and headquarters. Some of the modules that are used in the inspection process are:

    Inspection Planning Authority System (IPAS)
    Inspection Planning (IP)
    Inspection Report Tracking System (IRTS)
    Item Reporting (IR)

03.08 <u>Sent date</u>. The date in which an inspection report was signed. The sent date should <u>always</u> be populated in RPS/IRTS after validating the PIM entries for accuracy. RPS treats an inspection item as finalized once the "Sent Date" is entered in the RPS/IRTS module.

0306-04   RESPONSIBILITIES AND AUTHORITIES

04.01   <u>Program Offices</u>.

    a.   Ensure that RPS implementation is consistent with related NRC policies, programs, and guidance, and other NRC information systems.

    b.   Resolve RPS implementation problems, prioritize system enhancements, and update and issue implementation guidance.

    c.   Verify the accuracy and timeliness of the data maintained in RPS and on the ROP Webpage in accordance with established schedules.

    d.   Control access to RPS by program office users. Remove RPS access for staff who no longer need access to RPS modules and add access for new authorized users. Periodically conduct a review of authorized users for each RPS module.

    e.   Ensure the timely and accurate recording of time for all program office activities to support the ROP.

    f.   Ensure the timely and accurate transfer of inspection reports, assessment letters, and inspection plans from ADAMS to the Web server to support the posting of this information to the ROP Webpage.

    g.   The NRR Reactor Inspection Branch (IRIB), Division of Inspection and Regional Support (DIRS):

        1.   Maintains the inspection manual and procedures in accordance with IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual;" and

2. Updates the data in RPS/IPAS module to ensure the inspection procedure hours and sample sizes are correct.

04.02 <u>Regional Offices and the Office of Nuclear Security and Incident Response (NSIR)</u>.

a. Ensure the timely and accurate entry of RPS data for all regional or NSIR activities including, but not limited to, inspection report ML numbers from ADAMS, the inspection plans and the PIM.

b. Ensure effective management of open items tracked in RPS in accordance with regional policies, procedures, and practices.

c. Ensure complete and accurate entry of enforcement-related open items, including notices of violation (NOVs), NRC identified non-cited violations (NCVs) for which the staff chooses to exercise discretion and refrain from issuing an NOV, licensee identified non-cited violations (LINCVs) that the licensee identifies during an inspection, notices of deviation (DEV), and escalated enforcement items (EEI).

d. Control access to RPS by regional office users. Remove RPS access for staff members who no longer need access to RPS modules and add access for new authorized users. Periodically conduct a review of authorized users for each RPS module.

e. Ensure the timely and accurate recording of time for all regional activities to support the ROP.

f. Ensure the timely and accurate entry of inspection reports, assessment letters, and inspection plans in ADAMS to support the posting of this information to the ROP Webpage.

g. Verify the accuracy and timeliness of the data maintained in RPS and on the ROP Webpage.

04.03 <u>All RPS Users</u>. Ensure that the following security considerations are understood and adhered to:

a. Access to RPS modules (i.e., IP, IR, etc.) is controlled via the RPS Security Access System (SAM) module to ensure that entry and update capabilities are restricted to authorized personnel only. The SAM module is maintained by designated Office of Nuclear Reactor Regulation (NRR), NSIR, and regional representatives. These representatives have the capability to allow or restrict access to each RPS module by any individual member of the NRC staff.

b. RPS may contain pre-decisional information, so system confidentiality is necessary to prevent inappropriate disclosure of this type of information. Provisions for controlling access to information found in the RPS database are specified in the Privacy Act of 1974, 5 USC 552a, and in the NRC's regulations specified in 10 CFR Part 9.

c. To the extent possible, and unless directed to by other program guidance, proprietary data and other sensitive unclassified information should be excluded from both the RPS database and the ROP Webpage. Safeguards information and references to an allegation or alleger shall not be entered into RPS.

0306-05   GENERAL REQUIREMENTS

05.01   Inspection Procedure Planning and Frequencies.

a. The regions and NSIR use the RPS/IP module to plan and schedule inspections based on an annual inspection planning cycle (IPC).

1. Annual IPCs begin on January 1st and end on December 31.

2. Semi-annual frequencies have two 6-month periods per IPC:

(a) January 1 to June 30, and

(b) July 1 to December 31

3. Quarterly frequencies have four 3-month periods per IPC:

(a) Q1: January 1 to March 31,

(b) Q2: April 1 to June 30,

(c) Q3: July 1 to September 30, and

(d) Q4: October 1 to December 31.

4. Biennial cycles are performed at least once during ROP cycles 1-2, ROP cycles 3-4, ROP cycles 5-6, etc. It is not intended for this to be based on a rolling 2 year cycle.

5. Triennial cycles are performed at least once during Reactor Oversight Process (ROP) cycles 1-3, ROP cycles 4-6, ROP cycles 7-9, etc. It is not intended for this to be based on a rolling 3 year cycle.

For more information on biennial and triennial cycles, please refer to IMC 2515, specifically Attachment 1.

b. The regions plan inspections by scheduling inspection procedures that are listed in the RPS/IPAS module.

1. The inspection procedure numbers listed in the RPS/IPAS module are identical to actual inspection procedure numbers.

(The exception would be procedure 994OA7, which has been added to the baseline table in IPAS to allow for a count of licensee identified non-cited violations (LINCVs). The number of LINCVs documented in each report will be counted and certified as 994OA7 "BI" samples in the ROP Samples module of RPS/IR.

2. Certain baseline inspection procedures have attachments, such as IP 71111, "Reactor Safety—Initiating Events, Mitigating Systems, Barrier Integrity," that have multiple inspection frequencies (e.g., annually and quarterly) and corresponding sample size requirements. There is an IPAS inspection procedure number for each inspection procedure frequency. A list of codes used in RPS/IPAS for IP 71111 attachments is located on the RPS "How Do I" webpage list of instructions located at:

http://nrr10.nrc.gov/nrr-office/rps/how-do-i/baselineinspection.pdf

c. The following modules can be used to review and produce inspection plans for any plant at any given period of time.

1. RPS/REPORTS/IP 22, "Inspection/Activity Plan." This is for the planned inspection activities excluding security. The inspection plan produced by this module is attached to the annual assessment and mid-cycle letters, in accordance with IMC 0305, to provide a schedule of NRC inspections at a given site for approximately the next 24 months. All letters and attached inspection plans are posted on the ROP Webpage. This report, excluding activities performed by Resident Inspectors only, is also provided to the Institute of Nuclear Power Operations (INPO) by HQ to minimize scheduling conflicts between the NRC and INPO.

2. RPS/REPORTS/IP 24, "Security Activity Plan." This is for the planned security inspection activities. The inspection plan produced by this module is sent to the licensee via separate non-publicly available correspondence, in accordance with IMC 0305, to provide the licensee a schedule of NRC security inspections over the next 24 months. These plans will not be posted on the public ROP Webpage, nor made public by any other means.

05.02 Inspection Procedure Status and Sample Sizes.

a. The information on completion status and completed samples entered in RPS is used to:

1. Track baseline completion for each reactor site,

2. Provide a count of LINCVs, and

3. Develop the monthly and annual completion status of the overall baseline inspection program for the ROP.

b. The completed sample size and procedure completion status should be updated and certified in RPS as soon as practical after completion of the inspection, but no later than

14 days after the inspection report is issued. This ensures accurate and timely reporting by the regions and NSIR, and enables proper credit to be given for inspection completion. If the sample size needs to be changed after certification, contact your regional RPS contact to de-certify the samples so that you can make the necessary corrections, because once the "certify" button has been clicked in IR, then the samples for an inspection are considered to be "locked."

To preserve the integrity of reports generated after the end of the year, the RPS/IP module does not allow changing any "Complete" status to "Incomplete" or "N/A" after 90 days following the end-of-cycle – or March 31st of the following year. The same time period is applicable in RPS/IR to enter samples in a specific inspection report. If you find a discrepancy after the end-of-cycle period has closed, please submit your request through the RPSHelp.Resource@nrc.gov e-mail address to change the sample size.

c.   Completed sample sizes are entered in the RPS/IR module.

1.   Step-by-step guidance for entering sample sizes is available through the RPS "How Do I - ROP Sample Size – Enter ROP Samples" webpage list of instructions at:

http://nrr10.nrc.gov/rps/how-do-i/ir-adding-samples.htm

Refer to each inspection procedure for sampling requirements. A summary of the minimum required sample sizes and frequency for each baseline inspection procedure is available on the Dynamic Webpage, ROP, "List of ROP Procedures," at:

http://nrr10.nrc.gov/nrr-office/rps/dyn

There are now two separate lists: one for "Baseline Inspections," and one for "EP and SG Inspections."

2.   Enter the number of samples actually inspected, and LINCVs counted as "BI," during the current inspection as the sample size. RPS will calculate the cumulative total. Actual samples inspected are to be reported in RPS, even if the required sample size is not met.

3.   Sample sizes are limited to whole numbers.

4.   The sample sizes are entered in RPS by site. For a site with multiple units, it is the user's responsibility to track and analyze samples for each unit.

5.   For sites that operate under a Unique Site Budget Model (USBM), the sample sizes entered into RPS do not apply. It is currently the user's responsibility to track and analyze samples for USBM sites. (This may change with Replacement RPS.)

d. The completion status of the procedure is updated in the RPS/IP module.

1. Step-by-step guidance for entering the completion status, as well as comments, is available through the RPS "How Do I – ROP Sample Completion" webpage list of instructions at:

http://nrr10.nrc.gov/rps/how-do-i/ip-sample-status.htm

2. A procedure's status can be "Incomplete," "Not Applicable," or "Complete." The specific procedure completion status codes reported in RPS/IP are defined as follows:

(a) Incomplete. All required items identified in the procedure have not been completed. The minimum number of required samples, as defined in the procedure, has not been inspected.

(b) Not Applicable (N/A). This indicates that completion of the procedure is not required during this inspection cycle. A status of N/A is only valid in two situations:

(1) Some procedures are site specific (i.e., a TI for one site). Therefore those biennial/triennial sites that are not subject to the procedure will use this code. For quarterly and annual procedures that are not required at the site, the status should be "Complete by Reference," with an annotation of why the procedure was not required.

(2) Biennial and triennial procedures that are not scheduled in the current IPC because they are expected to be completed later in the biennial/triennial period. Procedures that have a completion status of "N/A" are not included in the calculation of program completion. (If the procedures were completed previously within the biennial/triennial period, the completion status would be, "Complete – in previous years." See Example 4, page 11.)

(c) Complete. All required items identified in the procedure are completed, including inspection of the minimum number of required annual sub-samples.

(d) Complete - by Reference. A specific comment must accompany this selection explaining the reason. (See step d.1 for instructions on entering comments.) Two ways for this status to be valid are:

(1) All requirements of the procedure are met by work done in some other procedure(s) or at related units on the same site. The comment must reference the other inspection(s) as the basis for demonstrating that all procedure requirements are completed. For planning and reporting purposes, the procedure is considered completed.

(2)   For procedures that have the sample size determined by the performance of the plant over previous years, the minimum sample may vary to less or more than the required sample in RPS/IPAS. Since RPS can only assign one sample size for the same inspection procedure, plants with a required sample size less than the assigned sample size would use this code.

(3)   Will be used to count the LINCVs identified during an inspection.

(e)   Complete - full sample not available. Several baseline inspection procedures are implemented "as required" or "as available." If at the end of the inspection cycle (or biennial/triennial period), the minimum sample size was reduced to below the minimum value, due to an insufficient number of samples with appropriate risk significance available for inspection, the procedure status is designated as "Complete – full sample not available." A specific comment must accompany this selection explaining the reason that the minimum sample size was not available for inspection during the inspection cycle.

Additionally some procedures (i.e., IP 71111.08) define a sample as performance of multiple steps or inspection of specific activities. In these cases, all steps must be performed or all activities must be inspected for the sample to be considered complete. If certain steps could not be completed due to sample unavailability, the procedure should be declared "complete – full sample not available." A comment must be provided addressing the specific steps or activities that could not be completed.

(f)   Complete - opportunity to apply procedure not available. This completion status should only be used if no part of the procedure was performed during the inspection cycle (or biennial/triennial period if applicable). A specific comment must accompany this selection explaining the reason that the opportunity to apply the procedure was not available during the inspection cycle. For example, the licensee did not conduct the activity covered by the procedure. (See Example 3 in step 6, below.) If the inspector simply did not complete the required number of samples or was unable to complete a specific activity due to inadequate sample activity, the completion status code "Complete – full sample not available" should be used.

(g)   Complete – in previous year(s). Only biennial and triennial procedures for which all samples have been inspected in the previous year(s) within the same biennial or triennial period can have this status. For more information on biennial and triennial inspections, see step 5 below.

3. All baseline inspection procedures that have a quarterly or semi-annual frequency will have a completion status of "Incomplete" until:

   (a) the cumulative minimum sample size for all inspection frequencies in the year has been reached for the procedure in RPS/IR, or

   (b) It is declared complete per one of the completion status codes in step 2.

4. All baseline inspection procedures that have an annual frequency will have a completion status of "Incomplete" until:

   (a) the cumulative minimum sample size has been reached for the procedure in RPS/IR, or

   (b) it is declared complete per one of the completion status codes in step 2.

5. For all baseline inspection procedures that have a biennial or triennial frequency:

   (a) The status of these procedures is "N/A" if they are not required to be completed during the current inspection cycle and will be completed in a future year within the biennial or triennial cycle.

   (b) The status is "Complete – in previous years" if the procedure was completed a previous year within the triennial or biennial period.

   (c) The completion status will be "Incomplete" if the procedure is required to be completed during the current inspection cycle, until:

       (1) The required minimum sample size is reached for the procedure in RPS/IR, or

       (2) It is declared "Complete" per a completion status code in step 2.

   (d) For an example of how to handle completion codes for biennial and triennial inspections, see Example 4 in step 6.

6. The following examples illustrate how to determine the completion status and sample size.

   (a) Example 1. A baseline IP (such as IP 71111.12) with a quarterly frequency requires reviewing two samples quarterly, for a total of 8 samples annually. In the first quarter, the inspectors reviewed only one sample. The branch chief (or designee) entered a completed sample size of "1" and did not change the completion status.

   During the second quarter, the inspectors reviewed two samples, per the procedure, and one additional sample that was missed in the first quarter inspection. The branch chief (or designee) entered the completed sample size of "3" and did not change the completion status.

When the cumulative completed sample size reached "8" in RPS/IP, the branch chief (or designee) changed the completion status to "Complete." (RPS/IP tallies the cumulative total number of samples to show the percentage of completed samples.)

(b) Example 2. The resident inspectors performed a baseline inspection procedure that required reviewing seven samples. Only five samples were available during the inspection cycle, based on the risk significance of the available samples..

At the end of the inspection cycle, or when it was determined that additional samples will not be available during the inspection cycle, the branch chief (or designee) entered "Complete - full sample not available" as the status with a sample size of "5." A comment was also added explaining the reason that the minimum sample size was not available for inspection.

(c) Example 3. A baseline inspection procedure that is to be completed "as conditions require" was not performed during the annual inspection cycle. Since there were no opportunities to perform the inspection by the end of the annual cycle, the branch chief entered "Complete - opportunity to apply procedure not available" as the status with a sample size of "0." A comment was added explaining the reason the opportunity to apply the procedure was not available.   (An example of this is IP 71114.04. If the licensee did not make any changes to the e-plan during the inspection cycle, this would be the appropriate completion status code to use.)

(d) Example 4.   A triennial inspection was completed in the second year of the triennial period. The completion status would be "N/A" for the first year, "Complete" for the second year, and "Complete – in previous years" for the third year.

7. The following four reports can be used to view completion status:

(a) RPS/REPORTS/IR/Power Reactors/ROP Items 8 shows the completion status of all baseline procedures by region or by site. (Check the "Include Comments" box to view the information entered by the inspectors in the completion status as mentioned in step 2.)

(b) RPS/REPORTS/IR/Power Reactors/ROP Items 8A shows the completion status of all non-security baseline procedures by region or by site. This report is used by the regions as part of the annual baseline completion verification memorandum.

(c) RPS/REPORTS/IR/Power Reactors/ROP Items 9 provides a summary of the number of completed samples for all ROP inspection cycles, by site, for all baseline procedures. This report is helpful for determining completion of those procedures that have biennial and/or triennial frequencies.

(d) RPS/REPORTS/IR/Power Reactors/ROP Items 7 provides an option to show reports based on ROP procedure status.

05.03 Inspection Report and Item Numbering.

a. Inspection Report Numbering.

1. Every inspection report, preliminary or final significance determination letter, traditional enforcement (TE) letter, Notice of Violation (NOV) letter, end-of-cycle (EOC) assessment letter, mid-cycle assessment letter, or assessment follow-up letter for a given unit is uniquely numbered in RPS/IRTS. Each report or letter is classified by type using the drop down menu.

2. The current numbering format for an inspection report is:

05000###/YYYY***

Where

is the docket number, YYYY is the year, and *** is the sequential report or letter number. (ADAMS and OIS staff are working to change the numbering format, based on a Federal mandate that all agencies must now follow.)

(a) Verify the correct IPC is associated with the report when it is generated.

(b) Listed below is the numbering convention used for most reports. Reports that end in 001 to 006, 401, 402, and 501 are reserved for assessment and integrated inspection reports. The rest of the numbering convention is for information only and not a required guidance:

	Through 2014	**Beginning 2015**
YYYY001	Annual Assessment	1st Quarter Integrated Report
YYYY002	1st Quarter Integrated Report	2nd Quarter Integrated Report
YYYY003	2nd Quarter Integrated Report	3rd Quarter Integrated Report
YYYY004	3rd Quarter Integrated Report	4th Quarter Integrated Report
YYYY005	4th Quarter Integrated Report	Mid-Cycle Assessment
YYYY006	Mid-Cycle Assessment	Annual Assessment
YYYY007-099	Inspection Reports	Inspection Reports
YYYY2**	Headquarters	Headquarters
YYYY3**	Operator Licensing	Operator Licensing
YYYY401	Security Annual Assessment	Security Mid-Cycle Assessment
YYYY402	Security Mid-Cycle Assessment	Security Annual Assessment
YYYY403-499	Security Inspection Reports	Security Inspection Reports
YYYY501	Emergency Preparedness Annual Inspection Report and other related activities documented in the Integrated Report	Emergency Preparedness Annual Inspection Report and other related activities documented in the Integrated Report
YYYY502-599	Emergency Preparedness Inspection Reports	Emergency Preparedness Inspection Reports
YYYY6**	Part 50 Construction	Part 50 Construction

(A separate series for decommissioning reports will not be used at this time. Instead the 001 – 006 reports will be unlocked for use at the sites that are only decommissioning reactors and do not have an operating reactor as well, such as Kewaunee and Vermont Yankee, for example)

3.   The report number shall be associated with the given item in RPS/IR.

b.   <u>Inspection Item Numbering</u>.

1.   An item number is required for each item identified in the inspection report, including each of the six type codes: violation (VIO), non-cited violation (NCV), apparent violation (AV), finding (FIN), unresolved item (URI), and traditional enforcement without an associate finding (TE).

2.   For all licensed facilities, the numbering format for an inspection item is:

<type> 05000###/YYYY***-$$

Where

<type> is the finding type code (VIO, NCV, AV, FIN, URI, or TE), #### is the docket number, YYYY is the inspection year, *** is the sequential report number, and $$ is the item number. (LINCVs will not be numbered as an item in an inspection report.)

Examples of inspection report item numbers are:

URI 05000346/2012004-01,
FIN 05000285/2012003-02,
VIO 05000443/2012301-03.

3.   An item number is unique for each distinct inspection finding.

    (1)   The first item identified in the inspection report has "01" as the item number ($$), and each subsequent item is numbered in sequential order, regardless of type.

    (2)   The item number is assigned in sequential order at the site level, not at the unit level.

    (3)   If an item applies to multiple units at the same site, the item number will be the same for all applicable units. In this case, the item number will be the next sequential number of highest item number at the site level. The docket number and the associated inspection report number distinguish the unit to which the item applies.

        The following examples illustrate proper item numbering for single and dual-unit sites:

Item Numbering for Single-Unit Site				
Item	Docket	Report	Item #	Remarks
1st VIO	05000346	2012002	01	
1st URI	05000346	2012002	02	
2nd VIO	05000346	2012002	03	
1st FIN	05000346	2012002	04	
Item Numbering for Dual-Unit Site				
1st URI	05000295	2012002	01	Unit 1
1st VIO	05000304	2012002	02	Unit 2
1st FIN	05000295	2012002	03	both units
	05000304	2012002	03	
2nd FIN	05000295	2012002	04	Unit 1
2nd URI	05000295	2012002	05	both units
	05000304	2012002	05	

05.04   <u>Charging Time for ROP Activities</u>.

a.   <u>General Guidance</u>. The general guidance on time and labor reporting for inspection related activities can be found at the following web page:

http://nrr10.nrc.gov/rps/how-do-i/

1. "For multi-unit single-owner sites, inspection hours can be charged to only one unit if the licensee agrees and the inspection report references all the docket numbers for the site. For one unit sites, and inspections performed under just one docket number on multi-unit sites (i.e. Special Inspections, License Renewal, Greater-than-Green Reports, etc.), inspection hours are charged to the specific unit on which the inspection was performed. Time must be reported accurately because licensees are billed on the basis of the reported data. In addition, NRC analyzes reported data to assist program refinements and budget formulation (IMC 0307, Appendix B, "ROP Realignment Process").

2. Time spent performing activities in support of the ROP is entered into the Human Resource Management System (HRMS) in accordance with guidance promulgated by the Office of the Chief Financial Officer (OCFO), NRR, and the regions.

3. A charge code consists of the docket number, inspection report number, task/activity code, and inspection procedure number (for direct inspection activities). This information is entered into RPS during planning, along with personnel assigned to each charge code. The HRMS will then extract the codes and populate them in the assigned personnel's profile. In order for the appropriate charge codes to appear in the HRMS, updates must be entered into RPS no later than Thursday of the prior week.

4. For inspectors performing inspections in other divisions outside their assigned division, contact the receiving division for assistance with time charges, if not provided to you prior to your inspection.

b. Inspection Activities.

1. Inspection Program Element (IPE) codes are used with the inspection procedures to charge direct inspection activities.

2. The IPE and activity codes are available through the RPS "How Do I" Webpage list of instructions at:

http://nrr10.nrc.gov/nrr-office/rps/how-do-i/activitycodes.pdf

The IPE and activity codes contained in this table are the only codes to be used for any inspection related activities supporting the ROP. Inspectors are encouraged to review HRMS literature and training manuals for a description of HRMS terms and the proper fields for time entry of ROP activities in HRMS.

3. Activity codes are used to charge non-direct inspection activities.

c.   Assessment Activities (including Security and Emergency Preparedness).

1.   The assessment report number that is created for each plant is based on the year for which performance is being assessed (i.e., the EOC Annual Assessment letter for plant performance during CY2015 would be 05000###/2015006).

2.   There are two annual assessment report numbers that are created for each plant every year:

YYYY006 is used for input into all Annual assessment activities for the year YYYY, except mid-cycle activities between March and August. Assessment activities should be charged to the current year (i.e., assessment work performed in December 2013 is charged to 05000###/2013001, and work performed in January 2014 is charged to 05000###/2014001.) (starting with the 2015 reports, YYYY006 became the Annual Assessment Report number, it used to be YYYY001)

YYYY005 is used for input into all Mid-cycle assessment activities for the year YYYY. Any mid-cycle assessment activities between March and August will be charged to this report number. The mid-cycle assessment will be closed out at the end of August with the issuance of the mid-cycle assessment report. (starting with the 2015 reports, YYYY005 became the Mid-Cycle Assessment Report number, it used to be YYYY006.)

3.   All assessment related activities are charged to the "ASM" activity code. This includes preparing and conducting all assessment activities (such as quarterly, mid-cycle, end-of-cycle reviews, and other ongoing assessment activities.

d.   Security (SG) input for Inspection Planning Information.

1.   The inspection planning transmittal letter report number that is created for each plant is based on the year for which inspections are being scheduled (i.e., the Annual SG input for the planning and scheduling letter for plant inspections during CY2015 would be 05000###/2015402).

2.   There are two annual planning report numbers that are created for each plant each year:

YYYY401 is used for SG input to the mid-cycle planning report. However, all non-plant non-assessment inspection activities not associated with stand alone SG reports, between March to August are also charged to this report number. (starting with the 2015 reports, YYYY402 will be the Security Annual Inspection Planning Transmittal letter.)

YYYY402 is used for SG input for the annual inspection planning transmittal letter. However, all non-plant non-assessment inspection activities not associated with stand alone SG, except mid-cycle activities between March and August, are also charged to this report number. (starting with the 2015 reports, YYYY401 will be the Mid-Cycle Inspection Planning Transmittal letter.)

3.   All SG input for inspection planning activities are charged to the "SSM" activity code.

4.   For inspection activities, inspection results will be input into the inspection report and any inspection findings will be numbered per Section 05.03 step b.

    Inspectors should charge their time preparing, inspecting, and documenting SG procedures to the appropriate codes under the SG inspection report.

e.   Emergency Preparedness (EP) Assessment Activities.

1.   The inspection planning report number that is created for each plant is based on the year for which inspections is are being planned (i.e., the Annual inspection letter for plant performance during CY2015 would be 05000###/2015502).

2.   All inspection planning activities and non-stand-alone EP reports shall be charged to this report number. (YYYY501 per section 05.03).

3.   All EP inspection planning activities are charged to the "ESM" activity code.

4.   For inspection activities, inspection results will be input into the integrated report for that quarter and any inspection findings will be numbered using the integrated report number per Section 05.03 step b. Inspectors should charge their time preparing, inspecting, and documenting EP procedures to the appropriate codes under the annual EP inspection report number (501).

5.   A letter will be issued to the licensee at the end of the calendar year, consistent with the ROP inspection cycle, to close out the annual inspection report number.

05.05   Entering and Updating Inspection Findings in RPS and Plant Issues Matrix (PIM).

a.   The PIM provides a consolidated listing of individual plant issues (except URIs) that the NRC uses to assess plant performance. PIM entries are the vital link between inspection reports and information posting to the ROP Webpage. To ensure information posted to the Web is accurate, RPS/PIM entries must be timely and complete, even though there is no dedicated time frame to complete them.

1.   For entry of a new item, follow the below steps:

    (a)   From the toolbar, select "Report Item".
    (b)   Select the Site and the most recent Inspection Report that will be associated with the Item and click the "Ok" button.
    (c)   From the "Item List" window, select the "New Item" icon or "New Item" from the "Record" drop down menu. This will list all the open items currently in the PIM for the site you have selected.
    (d)   The "Item Entry" window appears
    (e)   Make all applicable entries to the item ensuring the narrative entry under the "Text" tab is updated to reflect all entries.

(f) Save all changes.

2. If an edit is needed, follow the below steps:

(a) From the toolbar, select "Report Item".
(b) Select the Site and the most recent Inspection Report and click the "Ok" button.
(c) From the Item List window, click on the Item to be edited to highlight it.
(d) Select the "Edit" icon from the toolbar, select "Edit Item" from the menu, or double-click on the Item.
(e) Make all applicable changes to the item ensuring the narrative entry under the "Text" tab is updated to reflect all changes. These changes can include but are not limited to type, significance determination, text, and status.
(f) Save all changes.

http://nrr10.nrc.gov/rps/how-do-i/ir-add-item-to-specific-rpt.htm

b. PIM entries are done via the RPS Item Reporting (RPS/IR) module with the "PIM List?" checked. A typical PIM entry includes the type, title, cornerstone, significance determination, Event Date, who identified the issue, item description, significance description, source document (normally the inspection report number), and a brief summary of corrective actions planned or completed.

c. The PIM shall be updated as soon as practical, but no later than 14 days after the issuance of the report (to meet the 60-day web posting due date in Section 05.06).

d. After all entries have been validated and reviewed for accuracy, populate the sent date in RPS/IRTS with the date the inspection report was provided to the licensee.

e. In order to close a PIM entry during the close out of an inspection report, a valid ML # must be entered into RPS/IRTS.

f. Required entries and updates in RPS/PIM.

1. All entries in the inspection reports, and all issues given an item number, are captured in the PIM, with the exception of URIs. Refer to IMC 0612, Appendix B, "Issue Screening," for issues required to be documented.

2. A new RPS/PIM entry should be created if a URI becomes an AV, FIN, VIO, or NCV and the URI closed. (LINCV's are not counted in the PIM.)

3. AVs that are later determined to be FINs or VIOs should be updated in RPS based on the inspection report that documents the change in status. AVs should not be closed and reopened as a FIN or VIO, nor should the Event Date be changed.

4. When a report or letter follows up on an existing item (i.e., final SDP letters and supplemental inspection reports), the PIM entry must be updated to reflect the new information. This is to ensure traceability of an issue from discovery to final resolution. Step-by-step guidance for adding and updating PIM entries is located at:

Adding:

http://nrr10.nrc.gov/rps/how-do-i/ir-add-item-to-specific-rpt.htm

Updating:

http://nrr10.nrc.gov/rps/how-do-i/ir-add-open-item-to-another-rpt.htm

A sample PIM entry for a greater-than-green finding, along with a summary of the process, is included in Section 05.05 step j.

5. When a report or letter discusses an individual item, that report or letter shall be associated with the given item in the PIM. Following the issuance of a report or letter, PIM entries should be created or updated for each item discussed in the RPS/IR module.

g. Special Cases and Examples.

1. Security-Related Inspection Items.

(a) Follow guidance in IMC 2201, Appendix A, "Security Baseline Inspection Program" for items identified in security inspection reports.

(b) Security items will be entered, updated, and closed in IR, and any information such as descriptions should be detailed similar to the content as described in IMC 0612, "Power Reactor Inspection Reports."

2. Unresolved Items (URIs).

(a) If an item remains unresolved upon issuance of an inspection report, it is designated as a "URI."

(b) URIs are documented in the body of an inspection report and assigned a tracking number.

(c) URI's are entered into RPS under the applicable cornerstone, with a type code of "URI," and a significance determination of "N/A" (not applicable). However, do not check the PIM box.

(d) URIs are closed in RPS based on the inspection report that documents the resolution.

3.   Significance To Be Determined.

    (a)   The final risk significance of a finding is determined during the significance determination process (SDP).

    (b)   Potentially or preliminary greater-than-green findings, as well as pending significance and/or escalated enforcement shall be entered into RPS under the applicable cornerstone, with a "Type" code of "AV" or "FIN," and with a significance determination of "TBD" (to be determined).

    (c)   Once the final characterization is determined and the final significance determination letter has been issued, the item description and significance determination is updated in the PIM per the guidance on the RPS "How Do I" webpage list of instructions (http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf) to reflect the latest information. The "Type" code can be "FIN," "VIO," or "NCV." Do not change the "Event Date."

4.   Cross Cutting Aspects. For any inspection findings assigned a cross-cutting aspect, the appropriate cross-cutting aspect box is checked in the RPS/IR "General" tab. The cross-cutting area boxes will automatically reflect the cross-cutting area of the selected cross-cutting aspect.

5.   Parallel PI Inspection Findings.

    (a)   Refer to IMC 0305 regarding this type of findings.

    (b)   When entering these findings in RPS, input enough detail to note the associated PI and that these findings are parallel PI inspection findings.

    (c)   Any new issues identified during the supplemental inspection beyond the scope of the original issue(s) are entered into the PIM as separate entries and are assigned the appropriate significance via the SDP.

6.   Supplemental Inspection Results for Inspection Findings.

    (a)   Summary of supplemental inspection results is added to the original inspection finding item in RPS.

    (b)   This item number is closed via "Update Item" and the summary of supplemental inspection results is entered into RPS using the procedure available on the RPS "How Do I" Webpage list of instructions at:

http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf

    (c)   Additional inspection findings identified during the supplemental inspection beyond the scope of the original finding(s) are entered in the PIM as new entries and are assigned the appropriate significance via the SDP.

7. Independent Items.

    (a) In the RPS/IR module, under "Topics," the "Independent Items" are used to track information from sources other than inspection reports in accordance with definitions in IMC 0612.

    (b) The following items should be tracked in RPS: Licensee Event Reports (type code "LER") (with the exception of telephone notifications), Confirmatory Orders (type code "ODR"), issues identified under 10 CFR Part 21 (type code "P21"), Safeguard Event Report (type code "SGI"), and other items. Information related to safeguards events should contain no greater detail than its associated initial Event Notification Report. Do not enter SUNSI-related information.

    (c) After LERs are entered in RPS as independent items, they must be associated with any inspection report that discusses and/or closes the LER. This enables tracking of LER documentation in IRs via RPS after they are closed.

    (d) Independent items are not included in the PIM. If the NRC will use the issue(s) not originating from an IR to assess plant performance (for examples, the investigation of a harassment and intimidation case by the NRC's Office of Investigation), the issue(s) must be discussed and referenced in the next resident report and then entered into the PIM.

    (e) The NRC staff shall take care to ensure that previously undocketed information that was not intended for public release is not introduced into the inspection reports and the PIM. Guidance on entering items such as Confirmatory Orders can be found on the RPS "How Do I" Webpage list of instructions:

        http://nrr10.nrc.gov/rps/how-do-i/ir-orders.pdf

8. Findings Held Open Greater Than 4 Quarters. Findings that are being held open greater than 4 quarters shall remain open in RPS/IR until the date in which the inspection report closing the finding is issued.

9. Findings With Violations Receiving Enforcement Discretion. Certain findings that have associated violations receiving enforcement discretion have different evaluation criteria in the assessment process. Please refer to IMC 0305 for guidance on findings qualified for this condition. For those findings, entries will be made in RPS/PIM, with explanation of the discretion, so they would be assessed properly in accordance with IMC 0305.

10. Notice of Enforcement Discretion (NOED). When a Notice of Enforcement Discretion (NOED) is granted, no violations/findings will be entered in RPS. Any

11. findings/violations associated with follow up inspections on NOED will follow guidance in IMC 0612. Refer to IMC 0612 for use of URIs with NOED.

12. <u>Traditional Enforcement (TE) Violations</u>.

   (a) If a TE violation does not have an associated finding (e.g., no performance deficiency), choose "TE" as the "Type" code in RPS/IR. The "TE?" checkbox will automatically be checked, and the "Cornerstone," "Significant Determination" and "Cross Cutting Areas" fields will be grayed out. Choose the applicable "TE Severity Level" from the drop down menu.

   (b) If a TE violation has an associated finding, choose the proper "Type" code (FIN, NCV, or VIO) and check the "TE?" checkbox. Enter the applicable "Cornerstone," "Significant Determination," and "Cross Cutting Areas" attribute to the finding, and choose the applicable "TE Severity Level" attributed to the violation.

   (c) If a finding and a TE violation need to be tracked *separately*, cross reference both records in the text section. For example, if additional time is required to investigate the TE violation (i.e., willfulness):

      (1) Create a record for the finding with "FIN" as the type code;

      (2) Create another record with "URI" as the "Type" code and document the potential TE violation in the text.

      (3) When the TE violation is finalized, change the "Type" code from "URI" to "VIO," or "NCV" and check "TE?" check box.

      (4) If there is no TE violation after investigation, close out the URI.

      (5) In both records (a) and (b), cross reference each other in the text field.

h. <u>Sample PIM Entry/ Inspection Finding Display on Web</u>.

   Below is a sample web display for a typical greater-than-green finding that has been processed through the SDP and the supplemental inspection has been completed.

   Additional guidance for making and revising PIM entries is available at:

   http://nrr10.nrc.gov/rps/how-do-i/pimentry.pdf

   Initial Entry: In this example, the initial preliminary finding was entered into the PIM in RPS/IR a few days after the inspection report was issued (IR# 05000xxx/2003012 dated September 8, 2003). The text was taken from the IR's summary of findings and entered in the "item description/significance" field. The type was entered as "AV" and

the significance was entered as "TBD." The "Event Date" was entered corresponding to the end of the last day of onsite inspection activities in which the item was identified as an "AV" (July 28, 2003).

First Update: The original PIM entry was updated in RPS/IR shortly after the final SDP letter was issued (IR# 05000xxx/2003015 dated December 7, 2003). The additional text summarizing the final significance determination was added to the "item description/ significance" field. The type was changed from "AV" to "VIO" and the significance was changed from "TBD" to "WHITE." The "Event Date" was not changed.

1. In the case of old items or items to be updated, the following steps should be followed:

    (a) From the toolbar, select "Report Item".
    (b) Select the Site and the most recent Inspection Report that will be associated with the Item and click the "Ok" button.
    (c) From the "Item List" window, select the "Update Item" icon or "Update Item" from the "Record" drop down menu. This will list all the open items currently in the PIM for the site you have selected.
    (d) Select the item from the list of open issues you wish to update.

    (e) Make all applicable changes to the item ensuring the narrative entry under the "Text" tab is updated to reflect all changes. These changes can include, but are not limited to, type, significance determination, text, and status.
    (f) Save all changes.

Second Update: The original PIM entry was updated in RPS/IR shortly after the supplemental inspection report was issued (IR# 05000xxx/2004004 dated March 14, 2004). The additional text summarizing the supplemental inspection results was added to the "item description/ significance" field. Again, the "Event Date" was not changed.

Refer to the steps above.

This example demonstrates the process necessary to ensure that the PIM entries on the web provide traceability of an issue from discovery to final resolution. The updates to the ROP Webpage will occur in accordance with the schedule described in section 05.06 or as soon as possible if there is a known change in licensee performance and resultant NRC actions. In order to update the web in a timely manner, regional staff must notify NRR's Performance Assessment Branch (IPAB) staff any time they reach a final determination or obtain clarifying information affecting a plant and its placement in the ROP Action Matrix Summary (AMS). The finding will appear on the Plant Inspection Findings Webpage for four quarters from the original finding date unless specific actions are taken to hold the finding open in accordance with IMC 0305.

Failure to Prepare a Shipment of Radioactive Waste to Satisfy External Package Radiation Level Limits

(Initial Entry)
An apparent violation was identified for the failure to prepare a package of radioactive material for shipment so that the radiation level does not exceed 200 millirem/hour at any point on the external surface of the package. Package surface radiation levels in excess of 200 millirem/hour were identified by a waste processing contractor upon receipt of the shipment from the licensee.

The finding was more than minor because it was associated with the "Program and Process" attribute of the Public Radiation Safety Cornerstone, and affected the cornerstone objective of ensuring adequate protection of public health and safety from exposure to radioactive materials.
(IR# 05000xxx/2003012 dated September 8, 2003)

(First Update)
The finding was determined to be of low to moderate safety significance (White) because the transportation problem involved an external package radiation level that exceeded limits by 25 percent and because the area of elevated radiation on the package was determined to be accessible to a member of the public during conditions normally incident to transportation.
(IR# 05000xxx/2003015 dated December 7, 2003)

(Second Update)
The NRC performed a supplemental inspection to assess the adequacy of the licensee's evaluation, extent of condition/cause review and associated corrective actions. The inspector determined that the licensee performed an adequate evaluation of the specific performance issue and that comprehensive corrective actions were completed to address each of the specific causes.

(IR# 05000xxx/2004004 dated March 14, 2004)

Inspection Report#: 2003012*(pdf)* [hyperlink to original IR]
Inspection Report#: 2003015*(pdf)* [hyperlink to final SDP letter]
Inspection Report#: 2004004*(pdf)* [hyperlink to supplemental IR]

i.   Producing PIM Reports.

1.   RPS/IR Report 4, "ROP PIM Report," may be used to generate a PIM report by site, docket, or region for a specified time period. By default, PIM reports are sorted by cornerstone ad the time period is a full year from the day the report is requested, however, users may select different sorting criteria and time frames.

2. Non-ROP related PIM reports can be obtained using RPS/IR Report 3, "Non-ROP PIM Report," for inspection findings for any site and time period prior to initial implementation of the ROP (before April 2000). Additionally, the RPS Dynamic Webpage provides numerous categorized reports.

j. Plant Inspection Findings Webpage.

1. The Plant Inspection Findings Webpage displays the summary of inspection findings entered in the PIM.

2. This Webpage includes all issues designated as "VIO," "FIN," "AV," and NRC identified and self-revealing "NCV."

3. Findings and PIs in the Security cornerstone will not be made public. However, any historical data entered before the third quarter 2004 will still remain available on the Webpage. NRC employees may gain access to the current Security PIs and inspection findings through ROP Digital City at:

http://nrr10.nrc.gov/rop-digital-city/index.html

05.06 ROP Web Posting Process, Content and Schedule.

a. Web Posting.

1. The tables below provide the types of inspection reports that are posted and due dates for data submissions and updates to the ROP Webpages. When a due date falls upon a weekend or federal holiday, the due date is the next federal working day.

Insp Rpt Type	Description	On List of Reports?
A	Assessment Report	No
D	Final Determination Report	Yes
F	Assessment Followup Report	Yes
I	Integrated	Yes
M	Materials Special	No
O	Operator Licensing	No
R	Materials Routine	Yes
T	Team or 45 Days Report	Yes
U	Supplemental Inspection	Yes
V	Reactive Inspection (SIT)	Yes
W	Reactive Inspection (AIT, IIT)	Yes

Information	Due date (Days following the end of the calendar quarter)
Licensees submit Performance Indicators	21 days
HQ archives previous quarter data in historical performance Webpages	21 days
IPAB posts updated Performance Indicators, PIM results, and inspection reports to internal Webpage for review	24 days (or 3 business days after licensee submittal date)
Regions send AMS email message to ROPassessment.Resource@nrc.gov	30 days
IPAB posts Performance Indicators, any available PIM entries, and inspection reports, to internal and external Webpages	35 days
Regions send assessment follow-up letters to licensees (if applicable) and email them to ROPassessment.Resource@nrc.gov	49 days
IPAB reposts information to the internal and external ROP Webpages to capture updated PIM and IR.	50 days
IPAB updates assessment letter Webpage and Action Matrix Summary (AMS), if applicable.	51 days (AMS quarters 1 and 3)
Regions send mid-cycle or annual assessment letters to licensees and email them to ROPassessment.Resource@nrc.gov	63 days
IPAB updates assessment letter, AMS, and Cross-Cutting Issue (CCI) summary webpages at the end of mid-cycle and end-of-cycle periods	65 days (AMS quarters 2 and 4)
Corrections or change in SDP of any findings (greater-than-green)	As needed
Regions send AMS for Action Matrix changes that occur at times other than the quarterly reviews	7 days after information is publicly available
Changes to AMS (along with findings, inspection reports, and assessment letters) posted to external Webpage (outside of quarterly input)	14 days after information is publicly available

2.   On the 35th day and 60th day following the end of each quarter, the ROP Webpage will be updated with the latest available PIM entries (from the RPS/IR module), inspection reports (from ADAMS), and related inspection findings. The 60th day posting is to include any newly issued inspection reports and updated PIM that were not captured by the first posting.

3. When there is a change in Action Matrix column designation, the PIM entries and related inspection reports are posted as soon as practical after the reports become publicly available. These updates include the final significance determination that resulted in a risk significance that is greater-than-green or a final enforcement decision that resulted in a notice of violation being issued.

4. The ROP Webpages will also be updated on an as-needed basis to correct any discrepancies, omissions in previously posted information, or if there is a change in licensee performance (generally for greater-than-green findings) and resultant NRC actions.

b. <u>Performance Indicators</u>.

1. Licensees submit quarterly PI data, in accordance with NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," to the NRC typically within 21 days following the end of the reporting period.

2. Within 3 business days after the due date of the licensees' data transmissions, the PI data, indicator values, and associated graphs are posted to the NRC's <u>internal</u> ROP Webpage. The regions then review the PIs and determine the Action Matrix designations, as well as identify any errors prior to public release.

3. The NRC posts the PIs, along with the latest inspection findings and Action Matrix designations, to the agency's internal and external ROP Webpages 35 days following the end of each quarter.

4. Licensees are expected to submit changes to PI data as soon as practical, but no later than the end of the quarter in which an error is discovered. The NRC then updates the ROP Webpage accordingly.

c. <u>Inspection Reports</u>.

1. The regions and NSIR are responsible for entering:

    (a) Inspection reports into ADAMS in accordance with the ADAMS template;

    (b) Inspection report ADAMS accession number into RPS/IRTS; and

    (c) Latest inspection findings into the PIM in accordance with this manual chapter.

2.   In order to support posting these documents to the ROP Webpage, inspection reports must be:

(a)   Processed and declared in ADAMS as publicly available;

(b)   The release date in ADAMS is at least a day before the date of posting;

(c)   Placed in the applicable site subfolder within the "Power Reactor Correspondence" folder of ADAMS;

(d)   The Inspection Report "Sent Date" must be entered in RPS/IRTS; and

(e)   For integrated reports:

(1)   The Inspection "Completion Date" must be on the last day of the quarter the inspection is in, and

(2)   The Inspection "Close Date" must be before the sweep date (Section 05.06 step a.1).

3.   When it is necessary to reissue inspection reports to correct inaccuracies, a revised inspection report (also known as an ERRATA, or error report) must be issued. Refer to IMC 0612, "Power Reactor Inspection Reports," and the section that provides directions on how to correct an issued report for the record. Replace the ADAMS accession number for the original report with the ADAMS accession number for the package containing the revised and original reports in the appropriated field in RPS/IRTS. When the revised report is declared in ADAMS as an official agency record and RPS/IRTS is updated, contact the Performance Assessment branch (IPAB) to update the external web-page.

4.   For security inspection reports, only the security report cover letter will be posted to the external Webpage. For the stand alone cover letter, the regions will issue a new cover letter with a distinct ADAMS accession number; this number is then placed in the "Accession No. (ML):" field in RPS/IRTS. The non-public security report ML number is placed in the "Referenced ML No.:" field.

d.   Assessment Letters and Inspection Plans.

1.   Mid-cycle letters and annual assessment letters with inspection plans are issued for all plants within 63 days after the completion of the second and fourth calendar quarters, respectively, in accordance with IMC 0305. These letters are placed on the public Webpage within two business days after they are dated and sent to licensees.

2.   Assessment follow-up letters are typically issued within 49 days after the completion of the first and third calendar quarters only for those plants that crossed performance thresholds, in accordance with IMC 0305.

Assessment follow-up letters typically do not include updated inspection plans, however, they may note any inspection plan changes associated with forthcoming supplemental inspections. These letters are placed on the public Webpage within two business days after they are dated and sent to licensees.

3. Assessment follow-up letters can also be issued on an as-needed basis between the quarterly reviews. These letters are placed on the public Webpage within 14 days after they are dated and sent to licensees to allow time for the other assessment-related Webpages to be updated.

4. The regions are responsible for entering:

   (a) Assessment letters and inspection plans into ADAMS in accordance with the ADAMS template, and

   (b) Assessment report ADAMS accession number into IRTS.

5. To support posting these documents to the NRC's public "ROP List of Assessment Reports/Inspection Plans" Webpage in a timely manner, assessment letters and inspection plans must be properly entered and declared in ADAMS and should be placed in the appropriate site subfolder within the "Power Reactor Correspondence" folder of ADAMS.

6. The regional offices shall email all issued assessment letters and inspection plans to ROPassessment.Resource@nrc.gov. IPAB staff will transfer the letters to the Q:\ drive and work with NRRWebServices Resource@nrc.gov to place them on the public Webpage.

e. Cross-Cutting Issues (CCIs). CCIs are identified during the mid-cycle and end-of-cycle performance review meetings and documented in the associated assessment letters. IPAB will update the NRC's public "ROP Cross Cutting Issues Summary" Webpage within two business days after the mid-cycle or annual assessment letters are available on the NRC's public "ROP List of Assessment Reports/Inspection Plans" Webpage.

f. Assessment-Related Webpages.

1. Action Matrix Webpage.

   (a) IPAB updates the NRC's public "ROP Action Matrix Summary and Current Regulatory Oversight" Webpage quarterly (35 days after the end of the quarter) after receipt of the regions' Action Matrix Summaries (AMSs) and as needed in accordance with assessment letters (within 14 days after they become publicly available).

(b)   To support timely changes to this Webpage, the regional offices shall place ROPassessment.Resource@nrc.gov on distribution for the following correspondence:

   (1)   All assessment letters (i.e., assessment follow-up letters, mid-cycle letters, and end-of-cycle letters);

   (2)   Supplemental inspection reports; and

   (3)   Final SDP letters.

(c)   Historically within 30 days following the end of each calendar quarter, each region used to email an AMS to ROPassessment.Resource@nrc.gov that describes:

   (1)   Action Matrix column assignments for all plants in the region;

   (2)   Basis for the column assignments; and

   (3)   Level of regulatory oversight. For all plants, describe the level of oversight (e.g., baseline inspection, IP 9500X supplemental inspection, IMC 0350 or IMC 0351 process, or Action Matrix deviation).

           The column assignments and level of oversight shall be determined using the guidance in IMC 0305.

        The Monthly Assessment at a Glance Report fulfills this requirement.

(d)   Each region used to email an AMS containing the same information as in (3) above for Action Matrix changes that occur at times other than the quarterly reviews, such as:

   (1)   Reaching a final significance determination;

   (2)   Issuing an assessment follow-up letter;

   (3)   Completing a supplemental inspection;

   (4)   Issuing a supplemental inspection report;

   (5)   Notifying a licensee of an Action Matrix deviation; or

   (6)   Obtaining information affecting a plant and its placement in the Action Matrix.

        The regional office should have emailed the AMS no later than 7 days after the information became publically available to support the ROP

update. Also, before submitting this new information, the regional staff used to update the PIM entries so that information could be verified and included on the ROP Webpage. However, the Monthly Assessment at a Glance Report has removed the need to submit AMS updates every time the Action Matrix changes.

(e)   For plants that are in Column 2, 3, 4, or 5, the basis for the Action Matrix column assignment should include the following:

(1)   Safety-significant findings or PIs that caused the movement;

(2)   Affected cornerstone(s); and

(3)   Quarters in which the safety-significant Action Matrix inputs exist.

See sample below.

Once the email is received, IPAB posts the AMS to the NRC's public "ROP Action Matrix Summary and Current Regulatory Oversight" Webpage to describe to the public the reason a plant is not in Colum 1, the status of current regulatory oversight, and any open Action Matrix deviations.

Sample format for AMS data submittal:	
Plant	List plant.
Action Matrix column	List column.
Basis for Action Matrix column	List basis if not in Column 1.
Current oversight	List status of supplemental inspections and other oversight actions beyond the baseline. If none, state "Baseline".
Deviations	List open Action Matrix deviations.

Sample language for column basis:

Plant X is in Column 2 because of one white inspection finding in the Emergency Preparedness Cornerstone originating in 2Q20YY Additionally, one red inspection finding in the Mitigating Systems Cornerstone originating in 4Q20YYis being considered as an old design issue in accordance with IMC 0305 and is not considered as an Action Matrix input.

Plant Y is in Column 3 because of one yellow inspection finding in the Mitigating Systems Cornerstone originating in 3Q20YY This finding is being held open, in accordance with IMC 0305, for greater than 4 quarters because *(...give details from the correspondence to licensee describing the extension on the inspection finding).*

Plant Z is in Column 4 because of one yellow inspection finding in the Public Radiation Safety Cornerstone originating in 1Q20YY and three white Action Matrix inputs in the Reactor Safety Strategic Performance Area, including one white PI in the Initiating Events Cornerstone (provide the name of the PI) from 3Q20YY through 2QYY, one white inspection finding in the Mitigating Systems Cornerstone originating in 3Q20YY, and one white inspection finding in the Barrier Integrity Cornerstone originating in 2Q20YY.

Sample language for current oversight:

An IP 95001 supplemental inspection will be conducted to address the X finding in the Y cornerstone.

An IP 95002 supplemental inspection was successfully completed (exited) on MM DD, 20YY, and barring any additional significant inputs into the Action Matrix, Plant X will return to Column 1 at the end of 4Q20YY.

An IP 95003 supplemental inspection was successfully completed (exited) on MM DD, 20YY, and by an assessment follow-up letter dated June 24, 20YY, Plant X was transitioned to Column 1.

Sample language for deviations:
In accordance with IMC 0305, the staff is deviating from the ROP Action Matrix as described in the assessment follow-up letter dated MM DD, 20YY.

2. <u>Action Matrix Deviations Webpage</u>.

   (a) Within 14 days after a licensee has been notified of an Action Matrix deviation, IPAB will update the NRC's public "ROP Action Matrix Deviations" Webpage to notify the public of the deviation and the basis for the deviation.

   (b) The regional office shall place ROPassessment.Resource@nrc.gov on distribution of the assessment follow-up letter describing the deviation.

   The email should also contain a description of the deviation as it should appear on the public Webpage. IPAB may modify the text as necessary before posting it to the public Webpage. The description should include:

   (1) Affected reactor units;

   (2) Date the EDO approved the deviation;

   (3) Description of the deviation;

   (4) Description of when the deviation is expected to be closed; and

   (5) Description of changes to ROP guidance, if applicable.

   END

0306-07   REFERENCES

IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual"

IMC 0305, "Operating Reactor Assessment Program"

IMC 0307, Appendix B, "ROP Baseline Inspection Procedure Reviews"

IMC 0310, "Aspects Within Cross-Cutting Areas"

IMC 0612, "Power Reactor Inspection Reports"

IMC 0612, Appendix B, "Issue Screening"

IMC 2201, Appendix A, "Security Baseline Inspection Program"

IMC 2515, "Light Water Reactor Inspection Program"

5 USC 552a, "Records Maintained on Individuals"

10 CFR Part 9, "Public Records"

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline"

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	6/24/03 CN 03-021	Initial Issue		
	ML053220168 11/15/05 CN 05-029	Revised to: 1) incorporate recommendations from a recent OIG audit of the Reactor Program System, 2) clarify the uses and definitions of several terms to ensure consistent application, 3) clarify the process for initiating and updating inspection finding information in RPS, and 4) remove several of the detailed attachments and tables to relocate them to the internal ROP Web page for easier revision and maintenance.		
	ML070240189 04/04/07 CN 07-012	Revised to inform the Program Offices and the Regions of updated guidance and procedures for RPS and the ROP Webpage. Researched commitments back four years - none found.		ML070790675
	ML083290114 12/04/08 CN 08-034	Revised to include guidance on Confirmatory Orders, clarifying the use of URI's, and Security items being entered into the PIM. In addition to incorporate feedback from stakeholders.		ML083290136
	ML111430179 11/17/11 CN 11-036	Rewrite for organization. Revised to make the format consistent with IMC 0040; to improve readability; to incorporate changes resulted from FBF (1579, 1516, 1488 and 1388); to correct outdated guidance; and to be consistent with IMC 0612 and 0305.		

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	ML12089A070 06/13/12 CN 12-009	Revised for Security Cornerstone Reintegration		ML12153A281
	ML14065A228 07/18/14 CN 14-016	Revised to include comments from FBF 0306-1739, which asks for clarification in LER section 05.05.g.7.(2) regarding tracking LERs in RPS, with the exception of telephone notifications and FBF 0306-1897, which discusses aligning IMC 0612 Exhibit 2 with IMC 0306, as well as make editorial changes, based on FBF 0306-1879 to ensure ease of use for new users to RPS, and FBF 0306-2000 which requests a match in the timeline for action matrix information, for both IMC 0305 and IMC 0306.		ML14181A494 0306-1739 ML13261A196 0306-1879 ML14181A388 0306-1897 ML13182A222 0306-2000 ML14181A469
	ML15341A089 12/23/15 CN 15-032	Revised editorially to change the manual chapter title to be more descriptive, change substantive cross cutting issue (SCCI) to cross cutting issues (CCI) per feedback form 0306-2138. Added information regarding inspection item numbering in Section 05.03.b.2 to say that LINCVs will not be numbered as an item in an inspection report. Added text for counting LINCVs specifically as "BI" for Congress with a placeholder baseline procedure, and changed security and emergency preparedness assessment letters to inspection planning transmittal letters.		0306-2138 ML15267A489 0306-2161 ML15267A541