

## APPENDIX B ISSUE SCREENING

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## Introduction & Limitations

The evaluation of inspection results begins with screening to determine if an ISSUE OF CONCERN (IOC) warrants INVESTIGATION by the Office of Investigation (OI), then proceeds to determine if it will be further evaluated and documented for consideration in the Operating Reactor Assessment Program. IOCs warranting documentation are evaluated to ensure significant inspection results are clearly communicated in a consistent manner and to support documenting the bases for significance determination and enforcement action.

Use Figures 1, 2, and 3, and additional guidance, as appropriate, to screen each Reactor Oversight Process (ROP) inspection-developed IOC. The guidance in this appendix is not all-inclusive. It must be used in conjunction with additional guidance documents, including but not limited to Inspection Manual Chapters 2515, 0305, and 0308, Inspection Procedures, the [ENFORCEMENT POLICY](#), its Supplements, the [ENFORCEMENT MANUAL](#), and Enforcement Guidance Memoranda, as appropriate.

A measure of subjectivity in issue screening is anticipated and accepted as no completely objective or mechanistic process has been identified that can satisfy the objectives of the ROP. Screeners, whether inspectors, staff, or managers, should be guided by a clear understanding of each screening objective, as discussed below and in applicable guidance documents, as discussed above. Screeners should also consider past experience, precedent, the over-arching regulatory message intended, and the consequence of the screening determination on the objectives of the specific screening step and on the ROP in general. Finally, screeners should ensure that all screening determinations are in alignment with the agency's [mission](#) and [values](#).

Contentious screening determinations should be escalated to regional management and/or the inspection program office. Specific issues and suggested enhancements to issue screening or any aspect of ROP should be forwarded using the ROP feedback form process. See [ROP Feedback Process \(IMC-0801\)](#) for additional information on the ROP Feedback Process.

The issue screening guidance in this appendix is but one element of the agency's broader mission and authority to regulate commercial nuclear power. The Commission may grant enforcement discretion. Enforcement discretion is routinely documented in Enforcement Guidance Memoranda. On occasion, an EGM may impact ROP implementation, including issue screening. This appendix must be considered and implemented in the context of the agency's hierarchy of document authorities. As such, it may be amended or superseded by higher authority.

## Integration of TRADITIONAL ENFORCEMENT

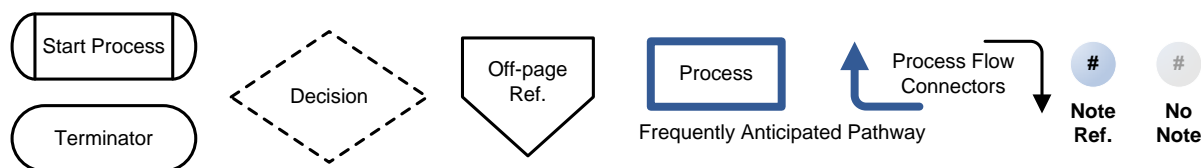
Appendix B implements an integrated approach to screening and dispositioning ROP IOCs and potential VIOLATIONS warranting TRADITIONAL ENFORCEMENT (TE). It separates the INVESTIGATION and/or disposition of each TE VIOLATION from the screening and disposition of its underlying ROP IOC while assuring appropriate coordination between the two activities. Because the TE VIOLATION is separated from the underlying FINDING and is not assigned an ROP color, it does not influence ROP Assessment. The FINDING, when present, will be dispositioned independently of the VIOLATION. It will be considered, as appropriate, in ROP Assessment.

Each IOC associated with a potential TE VIOLATION is screened (ignoring the potential TE VIOLATION) to determine if it independently constitutes a FINDING (e.g. A PERFORMANCE DEFICIENCY (PD) that is more-than-minor). The decision to continue ROP screening in parallel with a WILLFULNESS INVESTIGATION is coordinated between key regional and headquarters stakeholders to assure that it does not inadvertently compromise the INVESTIGATION.

Each ROP FINDING is evaluated for SIGNIFICANCE (e.g. COLOR), in accordance with the ROP SIGNIFICANCE DETERMINATION PROCESS (SDP). However, unlike the determination of TE VIOLATION SL (which is informed by the associated ROP FINDING COLOR), the ROP COLOR is determined independently whenever possible (without consideration of the associated TE VIOLATION SL).

### General Notes, Legend, and User Aids

Figures 1, 2, 3, are comprised of flow diagram logic blocks, process flow connectors, and reference numbers. Five logic block shapes are used. These shapes and their logical functions are illustrated below along with process flow connectors containing arrows illustrating the direction of logic flow and process queues such as the use of **bold borders** to denote more frequently anticipated pathways and dashed lines to denote steps requiring enhanced coordination:



On occasion, logic Block outputs split into multiple pathways. In other instances, a logic Block may be entered via more than one pathway. This is a consequence of integrating TE into the ROP. All logical pathways must be pursued and are accompanied by notes to draw the reader's attention. Terms displayed in ALL CAPS are explicitly defined in [IMC 0612](#) "DEFINITIONS."

All logic Blocks are accompanied by unique note reference numbers that, in many instances, correlate to more detailed guidance in the body of this appendix. This guidance may stand alone; it may paraphrase another document, or, if deemed appropriate to avoid unnecessary duplication, may simply refer the reader to the applicable guidance document.

## Figure 1 Overview

All screening begins at Figure 1, Block 1. Any IOC warranting closer review for POTENTIAL WILLFUL VIOLATION will be examined by an ALLEGATION REVIEW BOARD (ARB). Those IOCs determined not to warrant further review by the ARB will transition promptly to Figure 2.

When convened, the ARB, in cooperation with OI, will determine either (a) that an INVESTIGATION is not warranted (e.g. No WILLFULNESS) which will cause the IOC to transition directly to Figure 2, or (b) that a WILLFULNESS INVESTIGATION is warranted. Each IOC warranting a WILLFULNESS INVESTIGATION triggers a deliberative process involving key stakeholders to determine whether ROP screening of the underlying PD may proceed without compromising the INVESTIGATION. The decision to proceed with ROP screening constitutes an ROP PD presumption.

If, however, the IOC cannot be dispositioned without unacceptably compromising the INVESTIGATION, it is held at Figure 1 until the INVESTIGATION is sufficiently complete. Once permitted to proceed, the PD (minus the WILLFUL VIOLATION) is screened to determine whether it constitutes an ROP FINDING. Each ROP FINDING underlying a WILLFULNESS VIOLATION transitions to Figure 3.

If WILLFULNESS is confirmed, the associated TE VIOLATION is dispositioned in accordance with the [ENFORCEMENT POLICY](#), as informed by the SIGNIFICANCE of any underlying FINDING. The absence of an underlying ROP FINDING will inform- but will not preclude dispositioning or documenting the WILLFUL VIOLATION.

If the INVESTIGATION does not confirm WILLFULNESS, both the presumed PD and any associated non-WILLFUL VIOLATION will transition, together, to Figure 2.

## Figure 2 Overview

If WILLFULNESS is determined in Figure 1, then Figure 2 is bypassed. All Figure 2 screening originates from Figure 1 following the determination of "No WILLFULNESS." If not already accomplished in Figure 1, the IOC is screened in Figure 2 to determine if it involves a PD. Each PD is screened to determine both (a) if it involves a VIOLATION that (i) contributed to ACTUAL SAFETY CONSEQUENCES, or (ii) IMPACTED THE REGULATORY PROCESS (e.g. if it involves a non-WILLFUL TE VIOLATION), and (b) if the PD is more-than-minor (e.g. an ROP FINDING).

Each TE VIOLATION is separated from its underlying PD and dispositioned in accordance with the [ENFORCEMENT POLICY](#), as informed by the SIGNIFICANCE of any underlying FINDING. The absence of an ROP FINDING will inform- but will not preclude dispositioning nor documenting the TE VIOLATION.

Each ROP PD (minus any TE VIOLATION) is screened to determine whether it constitutes an ROP FINDING. Each ROP FINDING is screened to determine if it involves a non-TE VIOLATION. Each FINDING identified in Figure 2, regardless of its association with a TE- or non-TE VIOLATION, transitions to Figure 3.

Non-FINDINGS do not transition to Figure 3. Each Non-FINDING VIOLATION that is more-than-minor is dispositioned in accordance with the [ENFORCEMENT POLICY](#) to determine whether it will be documented as an NOV, NCV, or granted ENFORCEMENT DISCRETION. Figure 2 provides additional guidance for dispositioning an IOC that requires additional information in order to (a) determine if a PD exists, (b) if the PD is more-than-minor, or (c) if it involves a VIOLATION.

### **Figure 3 Overview**

Figure 3 receives and dispositions FINDINGS from Figures 1 and 2. It directs the screening of each FINDING to identify which is POTENTIALLY GREATER THAN GREEN. Alternately, each GREEN FINDING is screened to determine which is LICENSEE-IDENTIFIED. Each LICENSEE IDENTIFIED GREEN FINDING is screened to determine if it was correctly addressed through the licensee's corrective action process.

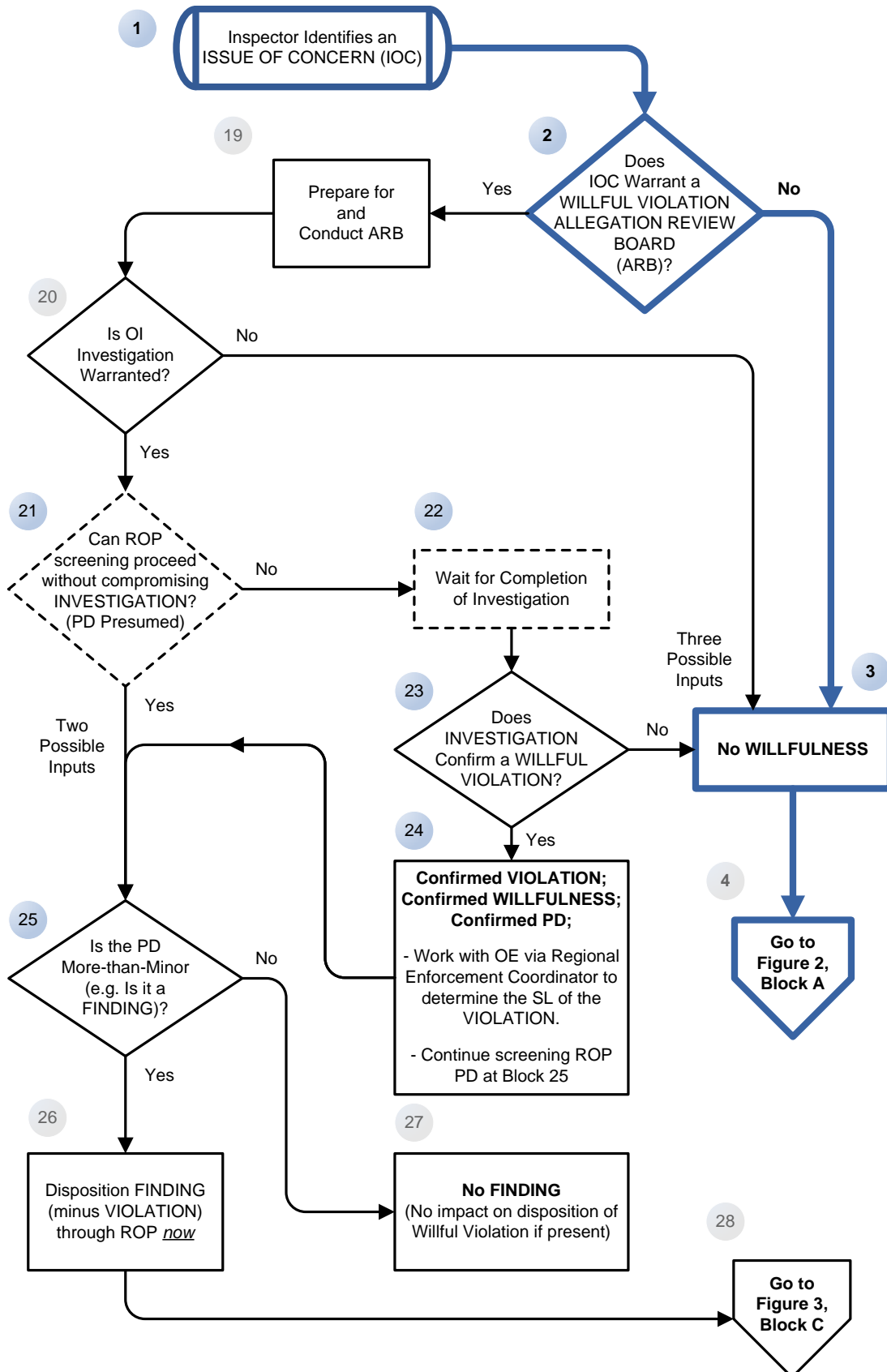
Each FINDING that is (a) not LICENSEE-IDENTIFIED and properly addressed by the licensee's CORRECTIVE ACTION PROGRAM (CAP), or (b) confirmed to be GREATER THAN GREEN, is screened to identify CROSS-CUTTING ASPECTS (CCAs), if present, and then fully documented.

Each potential CCA that is reflective of PRESENT PERFORMANCE constitutes a CCA. Each CCA identified through this process is documented with its associated FINDING.

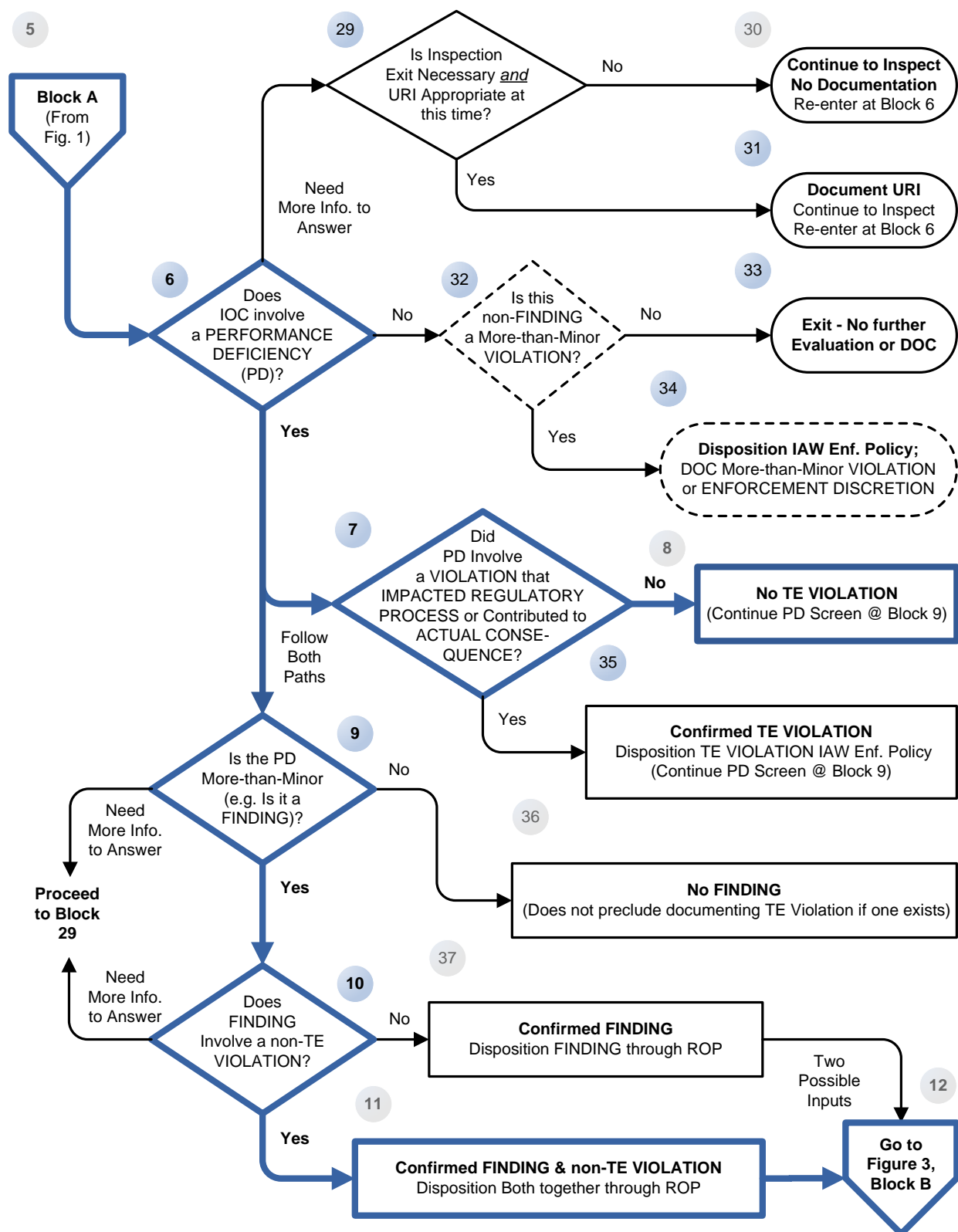
Each FINDING that is (a) is LICENSEE-IDENTIFIED, (b) is adequately addressed by the licensee's corrective action process, (c) is GREEN, and (d) involves a VIOLATION, will receive abbreviated documentation in 4OA7 of the inspection report. In general, FINDINGS meeting conditions (a) through (c) but which do not involve VIOLATIONS will not be documented.

Figure 3 also addresses conditions that occasionally warrant documenting an interim determination of FINDING TO-BE-DETERMINED (FIN-TBD) and APARENT VIOLATION (AV).

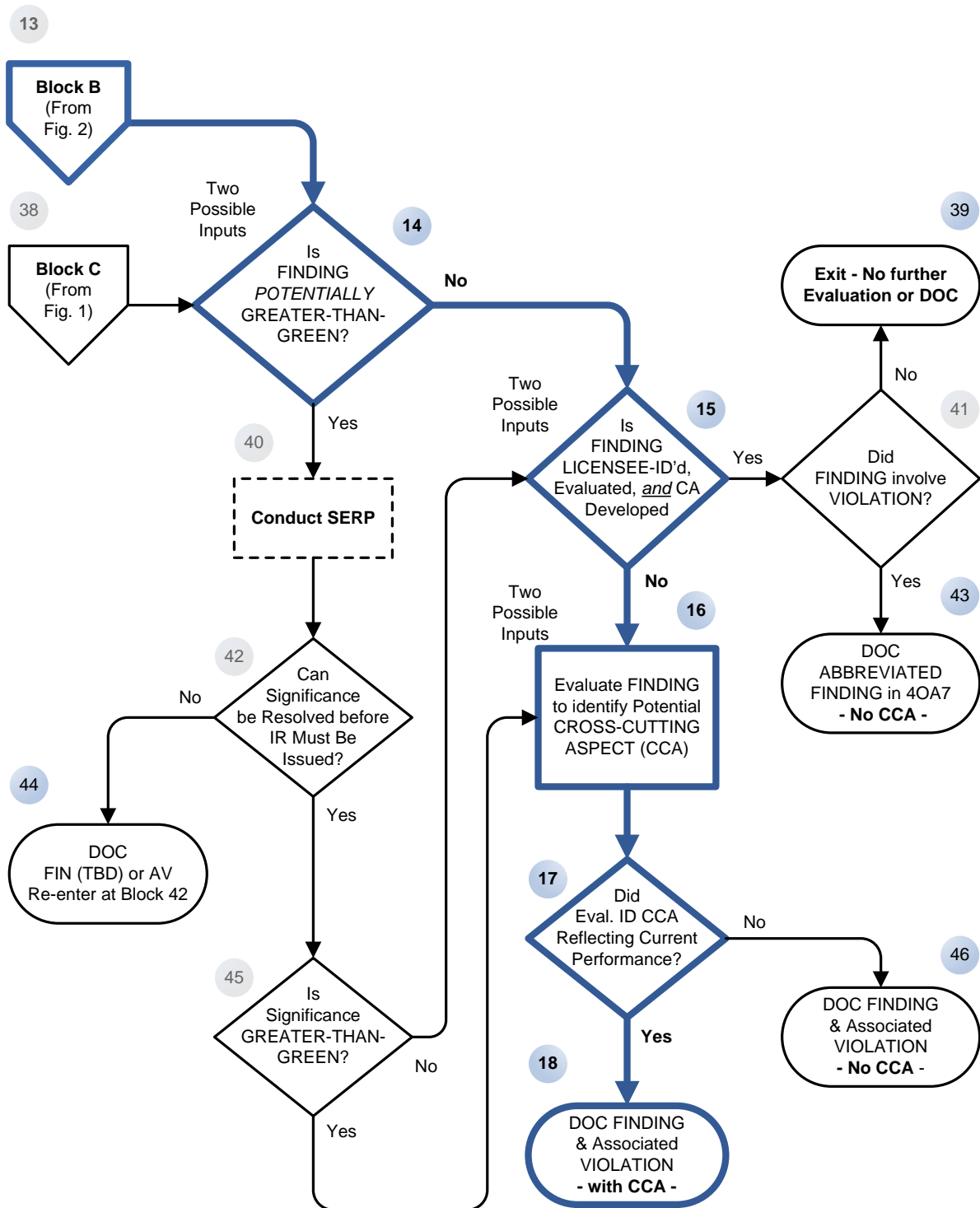
**Figure 1: Screen Issue of Concern for Willfulness; Coordinate Accordingly**



**Figure 2: TE Screen for Regulatory Process Impact or Actual Consequence; ROP Screen – Is Issue of Concern a Performance Deficiency, More-than-Minor, a Violation, a Non-Finding Violation, or otherwise**



**Figure 3: Determine Significance, Evaluate for CCA, and Whether to Document an Abbreviated Finding**






## Additional Guidance to Clarify Figures

The following additional guidance is intended to further clarify the application of Figures 1 through 3 in the ROP screening process. The guidance is arranged by reference number order. Guidance for each logic Block is preceded by the applicable reference number, figure number, and the logic Block, itself, as shown in its associated Figure. Additional guidance associated with Blocks considered to be self-explanatory is omitted to streamline Appendix B and to reduce unnecessary bulk, thus some blocks are not addressed below.

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### Block 1, Figure 1

1. As defined in [IMC 0612](#) Section 0612-03 "DEFINITIONS," an IOC is a well-defined observation or collection of observations that is of concern and may or may not involve a PD. IOCs are routinely identified during [IMC 2515](#) plant status and ROP inspection activities. Development and dispositioning of IOCs occurs as part of the ROP inspection sampling process and the IMC 0612 Appendix B issue screening process. 
2. All IOCs enter the issue screening process at Block 1 to ensure that every IOC is screened for POTENTIAL WILLFULNESS.
3. For IOCs with multiple examples, each example should be screened separately. Guidance for documenting FINDINGS with multiple examples is provided in [IMC 0612](#) Section 0612-06 'Documenting Findings.'

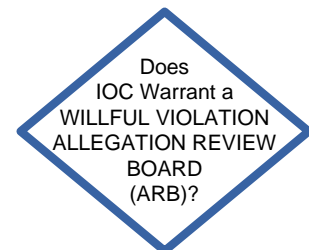
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### Block 2, Figure 1

The inspector and regional management, in referring an IOC to a WILLFUL VIOLATION ALLEGATION REVIEW BOARD (ARB), are effectively making two decisions: (a) Does this IOC involve a VIOLATION and (b) is there a sufficient basis to convene the ARB.


Although inspectors screen IOCs for indications of POTENTIALLY WILLFUL VIOLATIONS, the determination of WILLFULNESS is a legal decision that can only be made by the Office of General Council (OGC) using facts developed during an INVESTIGATION conducted by OI, normally at the recommendation of an ARB.

See [IMC 0612](#), the [ENFORCEMENT POLICY](#), the [ENFORCEMENT MANUAL](#), and [Management Directive 8.8 'Management of Allegations'](#) for additional insights regarding WILLFULNESS. See [10 CFR 50.5](#) for regulations addressing deliberate misconduct.



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### Block 3, Figure 1

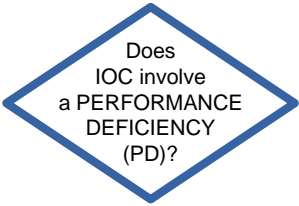
1. An IOC arrives at this determination in one of three ways:
  - a. The inspector screens-out the IOC as not a POTENTIALLY WILLFUL VIOLATION, 
  - b. The Allegations Review Board (ARB) does not confirm that an OI INVESTIGATION is warranted.
  - c. An OI INVESTIGATION does not confirm a WILLFUL VIOLATION.
2. The terms "willful" or "willfulness," as used here and in the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#), refer to VIOLATIONS involving either deliberate intent to

violate requirements or to falsify information, or CARELESS DISREGARD VIOLATION of requirements or for the completeness and accuracy of information provided.

3. Willful VIOLATIONS are of particular concern to the Commission because its regulatory program is based on licensees and their contractors, employees, and agents acting with integrity and communicating with candor.
4. Willful VIOLATIONS cannot be tolerated by either the Commission or a licensee. Therefore, a VIOLATION may be considered more significant than the underlying noncompliance if it includes indications of WILLFULNESS.

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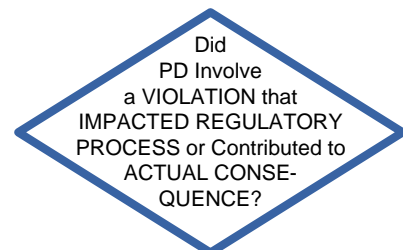
### Block 6, Figure 2

1. ROP PD Screen – Answer questions a. and b. below. If the answer to both questions 1.a. and 1.b., below, is “yes”, the IOC is an ROP PD. If either question is answered “no,” the IOC is not an ROP PD. IOCs determined to involve PDs proceed both to Block 7 for TE Screening and to Block 9 for Minor Screening. IOCs determined to not involve PDs are non-FINDINGS and proceed to Block 32.
  - a. Was the IOC the result of the licensee’s failure to meet a requirement or a standard? A PD can exist if a licensee fails to meet a SELF-IMPOSED STANDARD or a standard required by regulation.
  - b. Was the cause of the IOC reasonably within the licensee’s ability to foresee and correct and should the IOC have been prevented?
2. IMC 0308 Attachment 3 'Significance Determination Process' provides additional insight into the basis of this determination and the considerations associated with it.
3. When evaluating the licensee’s failure to meet a requirement or standard, inspectors should consider the licensee’s intent:
  - a. By definition, the licensee intends to meet regulatory requirements, including license conditions and Technical Specifications. This intent is clearly established under oath or affirmation in applicable licensing documents.
  - b. It is generally reasonable to conclude the licensee intends to meet standards established in current licensing basis documents. LIC-100 “Control of Licensing Bases for Operating Reactors” provides insights into what documents may constitute current licensing basis.
  - c. Evaluate whether or not the licensee intended to meet a specific industry standard. Failure to meet an industry standard does not constitute failure to meet a standard unless the licensee intended to meet that standard.
  - d. Focus on whether or not the licensee met regulatory requirements in an acceptable manner rather than whether the licensee met the requirements in a manner specifically approved in a generic communication.

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### Block 7, Figure 2

1. Non-WILLFUL TE VIOLATION Screen – The inspector, as necessary and appropriate, is expected to refer to the ENFORCEMENT POLICY, the ENFORCEMENT MANUAL and/or the Regional Enforcement Office coordinator for additional guidance on addressing the following TE VIOLATION questions.
2. Answer questions a. and b. below. If any of the questions



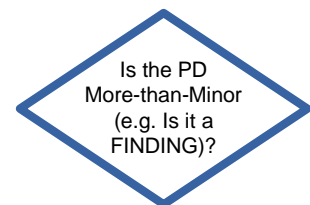
in is answered 'yes,' the VIOLATION must be compared to examples in the applicable supplement of the [ENFORCEMENT POLICY](#) to determine if the VIOLATION rises to SL-IV or above and thus constitutes a (non-minor) non-WILLFUL TE VIOLATION. If the VIOLATION rises to SL-IV or above, proceed to Block 35 - Confirmed TE VIOLATION. If all questions are answered 'no,' or if the VIOLATION does not rise to SL-IV or above, there is no TE VIOLATION. Proceed to Block 8 - No TE VIOLATION.

- a. Was there a VIOLATION that IMPACTED THE REGULATORY PROCESS? The NRC considers the safety implications of VIOLATIONS that may impact the NRC's ability to carry out its statutory mission. VIOLATIONS may be significant because they may challenge the regulatory envelope upon which certain activities were licensed. These types of VIOLATIONS include failures such as:
    - i. Failure to provide complete and accurate information,
    - ii. Failure to receive prior NRC approval for changes in licensed activities,
    - iii. Failure to notify NRC of changes in licensed activities,
    - iv. Failure to perform 10 CFR 50.59 analyses,
    - v. Reporting failure, etc.,
  - b. Was there a VIOLATION that contributed to ACTUAL SAFETY CONSEQUENCES? Examples may include:
    - i. actual onsite or offsite releases of radiation,
    - ii. onsite or offsite radiation exposures,
    - iii. accidental criticalities,
    - iv. core damage,
    - v. loss of significant safety barriers,
    - vi. loss of control of radioactive material, or
    - vii. radiological emergencies.
3. As discussed in 2, above, a TE VIOLATION must exist and rise to SL-IV or above to proceed to Block 35 – Confirmed TE VIOLATION. Otherwise, proceed to Block 8 – No TE VIOLATION. In either case, screening of the ROP PD continues at Block 9 – Is the PD more-than-minor.

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## Block 9, Figure 2

1. ROP Minor Screen – ROP minor screening is conducted for ALL PDs and only for PDs. Evaluate each PD against the minor screening questions in Paragraph 2, below, by comparing the PD to example PDs in [IMC 0612 Appendix E](#), when suitable examples are present, to determine whether the PD is of MINOR SIGNIFICANCE or more-than-minor. A PD that is more-than-minor is, by definition, a FINDING.



- a. If the PD is sufficiently similar to one or more “more-than-minor” examples and dissimilar from the “minor” examples to reasonably conclude that at least one of the minor screening questions in Paragraph 2, warrants a “yes” answer, the PD is more-than-minor and is a FINDING. Proceed to Block 10 – Does FINDING Involve a non-TE VIOLATION.
- b. If the PD is sufficiently similar to one or more “minor” examples and dissimilar from the “more-than-minor” examples to reasonably conclude that all of the minor screening questions in Paragraph 2 warrant a “no” answer, the PD is minor and not a FINDING. Proceed to Block 36 – No FINDING (Does not preclude documenting a TE VIOLATION, if one exists).
- c. If it is not possible to resolve whether the PD is minor or more-than-minor based on the steps above, whether because there are no sufficiently similar examples or because the

examples provide ambiguous or potentially contradictory guidance, proceed to Paragraph 2 – Minor Screening Questions. Also, consider submitting an ROP Feedback Form identifying the issue and proposing a resolution.

2. Minor Screening Questions – The following questions form the basis for determining whether an ROP PD is minor or more-than-minor. Apply the following questions directly to each PD that cannot be screened in accordance with Paragraph 1, above. Focus on the PD – not the IOC nor on other potentially-associated PDs. Whether or not the PD is associated with a VIOLATION should not drive the screening determination. The following questions are intended to be consistent with the [ENFORCEMENT POLICY](#) to the extent practical, recognizing that (a) the ROP addresses FINDINGS with- and without VIOLATIONS whereas the [ENFORCEMENT POLICY](#) Supplements only provide example VIOLATIONS, and (b) the [ENFORCEMENT POLICY](#) Supplements provide example VIOLATIONS but no screening questions to aid in determining which VIOLATIONS are minor or more-than-minor. If the answer to any of the following questions is “yes,” then the PD is more-than-minor and is a FINDING. Proceed to Block 10 – Does FINDING Involve a non-TE VIOLATION. If the answer to all of the following questions is “no,” then the PD is minor and is not a FINDING. Proceed to Block 36 – No FINDING (Does not preclude documenting a TE VIOLATION, if one exists).
  - a. Could the PD be reasonably viewed as a precursor to a significant EVENT?
  - b. If left uncorrected would the PD have the potential to lead to a more significant safety concern?
  - c. Does the PD relate to a performance indicator (PI) that would have caused the PI to exceed a threshold?
  - d. Is the PD associated with one of the cornerstone attributes listed at the end of this attachment and did the PD adversely affect the associated cornerstone objective?
3. Screening TE VIOLATIONS. The ROP screening process shall not be used to screen TE VIOLATIONS, only their underlying PDs. TE VIOLATIONS will be separated from their underlying PDs and screened using the examples and guidance provided in the applicable supplement to the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#). In screening TE VIOLATIONS, TE Aspects are considered in addition to the underlying VIOLATION.
4. Separating TE Aspects from PDs: When dispositioning PDs associated with TE VIOLATIONS, the TE aspect is not considered part of the ROP PD. This is because it is considered separately when the TE VIOLATION is screened using the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#).

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### Block 10, Figure 2

1. Determine whether the FINDING involved a non-TE VIOLATION of NRC requirements.
2. If the FINDING involved a non-TE VIOLATION, then proceed to Block 11 – Confirmed FINDING & non-TE VIOLATION (Disposition both together through ROP). Each FINDING involving a Non-TE VIOLATION will ultimately be documented in RPS as either NCV or NOV. See [IMC 0612](#) Section 0612-06 “DOCUMENTING FINDINGS” for documentation guidance.
3. If the FINDING did not involve a non-TE VIOLATION, proceed to Block 37 – Confirmed FINDING. Each Non-TE VIOLATION FINDING will be documented and entered into RPS as a FIN.



4. The absence of a non-TE VIOLATION does not obviate the requirement to disposition and document a TE VIOLATION in Figure 1, Block 24 or in Figure 2, Block 35, when appropriate.

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### Block 14, Figure 3

1. All FINDINGS entering Figure 3, whether from Figure 1 or Figure 2, will be screened using the Phase 1, "Initial Screening and Characterization" worksheet described in Attachment 4 to Manual Chapter 0609 to determine if they are POTENTIALLY GREATER-THAN-GREEN.
2. Most FINDINGS will be determined not POTENTIALLY-GREATER-THAN-GREEN and will transition to Block 15 – Is FINDING LICENSEE-ID'd, Evaluated, and CA Developed.
3. Those FINDINGS that are POTENTIALLY-GREATER-THAN-GREEN will transition to Block 40 – Conduct SERP for review by a Significance and Enforcement Review Panel (SERP).



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### Block 15, Figure 3

1. As discussed in [IMC 0308 'Reactor Oversight Process \(ROP\) Basis Document.'](#) staff should consider how it will address LICENSEE-IDENTIFIED issues so as to not discourage licensees from having an aggressive problem-identification process. This is accomplished by screening each FINDING to determine and disposition LICENSEE-IDENTIFIED FINDINGS which are being correctly evaluated and addressed differently than those FINDINGS that are either SELF-REVEALING or NRC-IDENTIFIED.
2. [IMC 0612](#) Section 0612-03 "DEFINITIONS," defines LICENSEE-IDENTIFIED FINDINGS as those FINDINGS that are not NRC-IDENTIFIED or SELF-REVEALING. Most, but not all, LICENSEE-IDENTIFIED FINDINGS are discovered through a licensee program or process.
  - a. Some examples of licensee programs that likely result in such FINDINGS are post maintenance testing, surveillance testing, ASME Section XI testing, drills, critiques, EVENT assessments, evaluations, or audits conducted by or for the licensee.
  - b. Other examples of LICENSEE-IDENTIFIED FINDINGS are those FINDINGS that are identified by the licensee as a result of their deliberate and focused observation during the course of performing their normal duties (e.g., plant operator or other licensee personnel identifying a packing leak on a valve or identifying a valve out-of-position during a routine tour of the facility would be considered LICENSEE-IDENTIFIED, although the individual's duties at the time may not have been to identify these types of deficiencies).
3. Since LICENSEE-IDENTIFIED FINDINGS are those FINDINGS that are not NRC-IDENTIFIED or SELF-REVEALING, a LICENSEE-IDENTIFIED screening determination must confirm both that the finding is consistent with the description and examples above and that it is not consistent with the following descriptions for either SELF-REVEALING or NRC-IDENTIFIED:
  - a. SELF-REVEALING: For the purpose of documentation in the ROP, SELF-REVEALING FINDINGS are those FINDINGS that become self-evident and require no active and deliberate observation by the licensee or NRC inspectors to determine whether a change in process or equipment capability or function has occurred. SELF-REVEALING FINDINGS become readily apparent to either NRC or licensee personnel through a readily detectable degradation in the material condition, capability, or functionality of



equipment or plant operations and require minimal analysis to detect. SELF-REVEALING FINDINGS are treated the same as NRC-IDENTIFIED FINDINGS for the purposes of documenting them in inspection reports.

Some examples of SELF-REVEALING FINDINGS include those resulting from: reactor trips and secondary plant transients; failure of emergency equipment to operate; unanticipated or unplanned relief valve actuations; obvious failures of fluid piping or plant equipment; identification of large quantities of water in areas where you would not normally expect such a condition; and non-compliance with high radiation area requirements that, in some cases, was identified through an electronic dosimeter alarm.

- b. NRC-IDENTIFIED: FINDINGS or VIOLATIONS, found by NRC inspectors, of which the licensee was not previously aware or had not been previously documented in the licensee's CAP.

NRC-IDENTIFIED FINDINGS also include previously documented licensee FINDINGS to which the inspector has significantly added value. Added value means that the inspector has identified a previously unknown weakness in the licensee's classification, evaluation, or corrective actions associated with the licensee's correction of a FINDING.

- 4. A measure of subjectivity in screening determinations is anticipated and accepted. Inspectors should be guided by a clear understanding of this screening objective, as discussed above, past experience, precedent, the over-arching regulatory message intended, and the consequence of the screening determination with regard to evaluation of CCAs and the transparency of communication with stakeholders.

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### Block 16, Figure 3

1. Inspectors shall review available causal information related to each NRC-IDENTIFIED or SELF-REVEALING FINDING and all GREATER-THAN-GREEN FINDINGS - and only these FINDINGS - to identify whether potential CCAs are present and, if so, which of the CCAs listed in [IMC 0310 "Reactor Oversight Process \(ROP\) Safety Culture Components and Aspects,"](#) best reflects the performance characteristic that is the most significant contributor to the FINDING (i.e. determine which CCA provides the most meaningful insight into why the FINDING occurred). A CCA is a FINDING characteristic - not a FINDING.
2. Potentially GREATER-THAN-GREEN FINDINGS should also be evaluated for CCAs, but the determination shall not be documented in an inspection report until at least one of the conditions in 1, above, is satisfied.
3. The evaluation and documentation of CCAs will usually not be influenced by whether a FINDING involves a VIOLATION or whether a VIOLATION involves enforcement discretion. Exceptions may occur.
4. Typically no more than one CCA will be assigned to a FINDING. On rare occasion, it may be appropriate to associate more than one CCA with unique or complex inspection FINDINGS. In these cases, the regional office must obtain concurrence from the Performance Assessment Branch Chief. If a finding has multiple examples, the multiple examples should have the same CCA, consistent with the [ENFORCEMENT MANUAL 2.13.7 "Documenting Multiple Examples of a Violation."](#)
5. Inspectors are not expected to perform independent causal evaluations beyond what would be appropriate for the risk significance of the issue to obtain more precise causal information.

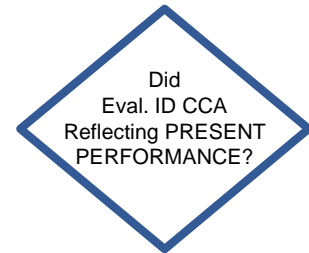
Evaluate FINDING to identify Potential CROSS-CUTTING ASPECT (CCA)

6. If a potential CCA correlates to an aspect related to Safety Conscious Work Environment (SCWE), consult the SCWE Finding Review Group (FRG), chaired by the Agency Allegation Advisor, to determine how to proceed.

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**Block 17, Figure 3**

If no potential CCAs were identified in Block 16, the FINDING does not have a CCA. Proceed directly to Block 46. If one or more potential CCAs were identified in Block 16, answer the following question with respect to each potential CCA to determine if it is reflective of PRESENT PERFORMANCE:

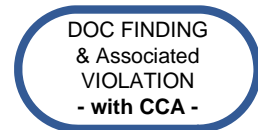


1. Did the performance characteristic described by (or associated with) the potential CCA occur within the past three years? (Note: Three years is based on the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#) precedent pertaining to Violations Involving Old Design Issues to differentiate licensee conduct reasonably linked to the PRESENT PERFORMANCE.)
2. If the answer is yes, the potential CCA is reflective of PRESENT PERFORMANCE and the associated FINDING has a confirmed CCA. Proceed to Block 18.
3. If the answer is no, the potential CCA is not reflective of PRESENT PERFORMANCE and the FINDING does not have a CCA. Proceed to Block 46.

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**Block 18, Figure 3**

1. At this terminator, a FINDING and associated CCA (or, in rare instances, more than one CCA) have been confirmed and are to be documented.
2. The FINDING may or may not be directly associated with a confirmed VIOLATION and that VIOLATION may or may not be associated with a confirmed TE attribute (e.g. WILLFULNESS, IMPACTING REGULATORY PROCESS, or ACTUAL CONSEQUENCES).
3. If there is no associated VIOLATION or if the associated VIOLATION is a TE VIOLATION, the FINDING will be documented as a FIN with CCA.
4. If the inspector confirms a non-TE VIOLATION, the inspector shall document the FINDING as either a VIOLATION (VIO) or a NON-CITED VIOLATION (NCV) with CCA.
  - a. Answer the following questions. As necessary, work with the Office of Enforcement (OE), through the Regional Enforcement Coordinator, and refer to the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#) to determine whether the VIOLATION should be cited (VIO) or non-cited (NCV):
    - i. Did the licensee fail to restore compliance?
    - ii. Did the licensee fail to enter the VIOLATION into their CAP?
    - iii. Was the VIOLATION willful?
    - iv. (For enforcement only) Was the VIOLATION repetitive and NRC-identified?
  - b. If the answer to any of the above questions is "Yes", the VIOLATION should be cited in a Notice of VIOLATION (VIO).

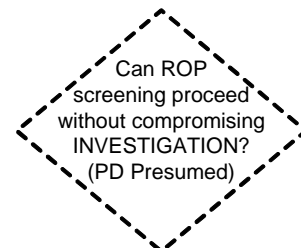


- c. If the answer to all of the applicable questions is “No”, the VIOLATION may be dispositioned as a NCV.
- d. See [IMC 0612](#) Section 0612-06 “DOCUMENTING FINDINGS” for additional guidance.

**Figure 1 Additional Guidance - Less Frequently Anticipated Pathways**

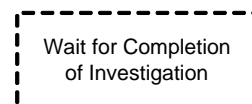
**Block 21, Figure 1**

1. Each IOC warranting a WILLFULNESS INVESTIGATION triggers a deliberative process involving key stakeholders to determine whether ROP screening of the underlying PD may proceed without compromising the INVESTIGATION. The decision to proceed with ROP screening constitutes an ROP PD presumption.
2. Dispositioning an ROP PD during an ongoing WILLFULNESS INVESTIGATION is not expected to be a common occurrence. Generally, to preclude the possibility of compromising an ongoing INVESTIGATION, inspectors will suspend ROP disposition activities that require licensee interaction until the INVESTIGATION is complete. However, there are instances in which continuation of ROP disposition and related licensee interaction are justified and appropriate. In making this determination, key stakeholders will:
  - a. Ensure that their specific concerns are considered in order to achieve the two desired agency outcomes – a valid and defensible ROP FINDING and a valid and defensible VIOLATION within the enforcement program, and
  - b. Generally include OI and OE, the associated Region, the Division of Inspection and Regional Support (DIRS). The primary parties to this decision will be the Directors (or their designees) of the OI Field Office, DIRS, and the associated Regional Division of Reactor Projects or Safety.
3. Timely resumption of the ROP PD disposition process is desirable because SDP insights developed during disposition are integral to dispositioning most TE VIOLATIONS. Thus the decision to defer ROP disposition should be revisited as soon as the INVESTIGATION is sufficiently complete or when new information arises that might otherwise warrant revisiting the decision. Because of the sensitive nature of INVESTIGATIONS and associated outcomes, all key stakeholders must concur on both the original decision and subsequent revisions to that decision.



**Block 22, Figure 1**

This Block requires enhanced coordination to preclude the possibility of compromising an ongoing INVESTIGATION by proceeding, prematurely, with ROP disposition activities while simultaneously assuring that ROP disposition activities are not delayed longer than necessary.





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**Block 23, Figure 1**

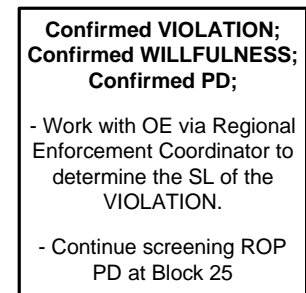
1. In accordance with the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#):
  - a. OI, upon concluding its INVESTIGATION will issue a conclusion about WILLFULNESS based on the facts collected/developed during its INVESTIGATION.
  - b. Using the facts/conclusion above, OGC will make a final determination about WILLFULNESS.
2. Upon confirmation of a WILLFUL VIOLATION proceed to Block 24 – Confirmed VIOLATION; Confirmed WILLFULNESS; Confirmed PD.
3. If a WILLFUL VIOLATION is not confirmed, proceed to Block 3 – No WILLFULNESS.



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**Block 24, Figure 1**

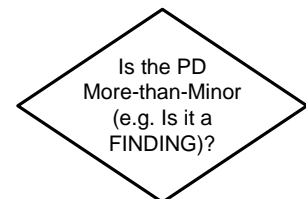
1. Work with the Office of Enforcement through the Regional Enforcement Coordinator to disposition VIOLATIONS involving WILLFULNESS. Consult the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#) for guidance.
2. A VIOLATION may be considered more significant than the underlying noncompliance if involves WILLFULNESS. When determining the SL of a WILLFUL VIOLATION, the NRC, in addition to considering the WILLFUL aspects, considers the (1) actual safety consequences; (2) potential safety consequences, including the consideration of risk information; and (3) potential for impacting the NRC's ability to perform its regulatory function.
3. An NOV (requiring a formal written response from a licensee) is normally required for a WILLFUL VIOLATION. However, an NCV may still be appropriate. Refer to the [ENFORCEMENT POLICY](#) for additional guidance.
4. The approval of the Director, Office of Enforcement, with consultation with the Deputy Executive Director as warranted, is required for dispositioning WILLFUL VIOLATIONS as NCVs.



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**Block 25, Figure 1**

1. See additional guidance from Block 9, Figure 2.
2. If the PD is minor, there is no FINDING; proceed to Block 27. The absence of a FINDING may influence but does not preclude the potential to confirm a WILLFUL VIOLATION though it may influence the determination of its SEVERITY LEVEL and/or CP.
3. If the PD is more-than-minor, there is a FINDING; proceed to Block 26. The presence of a FINDING does not preclude the potential to confirm NO WILLFUL VIOLATION. However, if a WILLFUL VIOLATION is determined to exist, it may influence the determination of its SEVERITY LEVEL and/or CIVIL PENALTY (CP).



## Figure 2 Additional Guidance - Less Frequently Anticipated Pathways

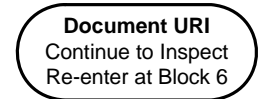
### Block 29, Figure 2

1. The decision to document a URI is a decision to commit future resources.
2. In most instances, an inspection will not exit (e.g. will remain open) until it has been completed and has gathered sufficient information. However, on occasion, circumstances occur which require an inspection to be exited pending receipt of information necessary to disposition an IOC.
3. When the inspection must exit pending receipt of additional necessary information, a URI will be opened.



### Block 31, Figure 2

1. According to [IMC 0612](#), Section 0612-03 “DEFINITIONS,” a URI is an IOC about which more information is required to determine if:
  - a. A PD exists,
  - b. The PD is more than minor, or
  - c. The IOC constitutes a VIOLATION.



Such a matter may require additional information from the licensee or cannot be resolved without additional guidance or clarification/interpretation of the existing guidance (e.g., performance indicator reporting guidance).

2. A URI may also be opened following issuance of a Notice of Enforcement Discretion (NOED) in order to obtain additional information concerning the cause or need for the discretion.
3. A URI shall not be opened:
  - a. to obtain more information to determine the significance of a finding,
  - b. to obtain more information to disposition a CCA, nor
  - c. to track completion of licensee’s actions associated with a finding or an inspection question.
4. The URI should be documented using the Introduction and Description Sections of the Four Part Format, as discussed in [IMC 0612](#) Sections 0612-06 “DOCUMENTING FINDINGS” and 0612-08 “DOCUMENTING UNRESOLVED ITEMS.” Because URIs are not FINDINGS, the Analysis and Enforcement Sections are not required.

### Block 32, Figure 2

1. According to [IMC 0612](#):
  - a. A FINDING is a PD of greater than minor significance. FINDINGS may or may not be associated with regulatory requirements and, therefore, may or may not result in a VIOLATION.
  - b. A MINOR VIOLATION is a VIOLATION that is of such low

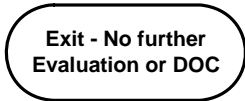


significance that documentation in an NRC inspection report is not normally warranted. VIOLATIONS associated with PDs of minor significance are normally deemed to be MINOR VIOLATIONS.

2. However, because the significance of VIOLATIONS associated with TRADITIONAL ENFORCEMENT (e.g. (a) WILLFULNESS, (b) IMPACTING THE REGULATORY PROCESS, or (c) ACTUAL SAFETY CONSEQUENCES) are usually adjusted upward as a consequence of these TE attributes, [ENFORCEMENT POLICY](#) must be consulted in screening VIOLATIONS with these attributes. (See Block 9 additional guidance).
3. Although MINOR VIOLATIONS must be corrected, they are not usually described in inspection reports. See [IMC 0612](#) Section 0612-11 "DOCUMENTING MINOR ISSUES AND MINOR VIOLATIONS" for guidance on documenting minor issues and MINOR VIOLATIONS for exceptions that may warrant documenting a MINOR VIOLATION. These exceptions may include:
  - a. Closing out a Licensee EVENT Report (LER),
  - b. Closing out a URI, or
  - c. Follow-up to an allegation.
4. Where a licensee does not take corrective action for an otherwise minor violation, willfully commits a violation, or the NRC has indications that the violation has occurred repeatedly, the matter should be considered more than minor, i.e., the matter should be categorized at least at Severity Level IV or associated with a green inspection finding and dispositioned in an NOV or NCV, as appropriate.
5. Finally, although a more-than-minor VIOLATION rarely occurs *absent* an associated PD, such VIOLATIONS must be dispositioned by either a CITED OR NON-CITED VIOLATION or considering enforcement discretion. Consult the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#).

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### Block 33, Figure 2

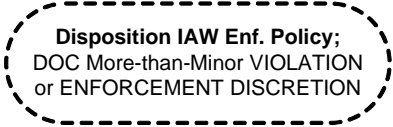
1. [IMC 0612](#) defines MINOR VIOLATION as a VIOLATION that is of such low significance that documentation in an NRC inspection report is not normally warranted. VIOLATIONS associated with PDs of minor significance are normally deemed to be MINOR VIOLATIONS. Licensees are required to correct ALL VIOLATIONS including those that are MINOR. 
2. Because the significance of VIOLATIONS associated with (a) WILLFULNESS, (b) IMPACTING THE REGULATORY PROCESS, or (c) ACTUAL SAFETY CONSEQUENCES are usually adjusted upward as a consequence of these traditional enforcement attributes, the [ENFORCEMENT POLICY](#) must be consulted in screening VIOLATIONS with these attributes.
3. In addition, as discussed in the [ENFORCEMENT POLICY](#), documentation of a MINOR VIOLATION may be warranted as part of closing out a LER, URI, or follow-up to an allegation. Licensees are required to correct MINOR VIOLATIONS.
4. If it is necessary to document a MINOR VIOLATION then only minimal discussion is required. The write-up should briefly describe the IOC, state that the issue has been addressed by the licensee and should include the following:

"This failure to comply with {requirement} constitutes a VIOLATION of minor significance that is not subject to enforcement action in accordance with the NRC's [ENFORCEMENT POLICY](#)."

5. An IOC, regardless of whether it involves a VIOLATION, may be documented if related directly to an issue of agency-wide concern, if allowed by an appendix to [IMC 0612](#), or by a specific inspection procedure or temporary instruction. In addition, limited documentation of the NRC's review of EVENTS associated with radioactive leaks and spills should be provided in the inspection report for those leaks and spills reported to State and local authorities even when there were no PDs identified or the PD is determined to be MINOR.
6. If it is necessary to document a MINOR non-VIOLATION then only minimal discussion is required. The write-up should briefly describe the issue and state that it has been addressed by the licensee, if applicable.

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**Block 34, Figure 2**

1. If a VIOLATION is more than minor, it must be dispositioned in an inspection report. Work with the Office of Enforcement through the Regional Enforcement Coordinator to disposition VIOLATIONS with no PD. Document the VIOLATION in accordance with [IMC 0612](#) Section 0612-07 "DOCUMENTING VIOLATIONS WITHOUT PERFORMANCE DEFICIENCIES" guidance for documenting VIOLATIONS without PDs. 
2. The [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#) address circumstances in which the agency may exercise ENFORCEMENT DISCRETION. A VIOLATION that does not involve a PD is *not* a FINDING, will not normally be documented using the four-part format, and may warrant ENFORCEMENT DISCRETION.
3. Work with OE through the Regional Enforcement Coordinator to determine the appropriate action. Also, see [ENFORCEMENT MANUAL](#) Chapter 5 "EXERCISE OF DISCRETION" for additional guidance. Consider the following two-part format when granting ENFORCEMENT DISCRETION:
  - a. The first part will describe the IOC, why there was no PD, and the safety significance. This part may be brief but should contain sufficient detail to explain the above, including how the significance was determined.
  - b. The second part will describe the requirement violated and include the following statement:

"However, because a performance deficiency was not identified, no enforcement action is warranted for this VIOLATION of NRC requirements in accordance with the NRC's [ENFORCEMENT POLICY](#). Further, because licensee actions did not contribute to this VIOLATION, it will not be considered in the assessment process or NRC's Action Matrix."
  - c. These VIOLATIONS are not documented in the Summary of Findings, receive no tracking number, and are not entered into the PIM. The cover letter shall contain the language required for exercising ED. See [IMC 0612](#) Section 0612-14 "COMPILING AN INSPECTION REPORT" for additional guidance.

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**Block 35, Figure 2**

1. The regulatory significance (severity level) of VIOLATIONS contributing to ACTUAL SAFETY CONSEQUENCE or IMPACTING THE REGULATORY PROCESS is determined in accordance with the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#). A CP is imposed with the VIOLATION, if appropriate.
2. Work with OE through the Regional Enforcement Coordinator to determine the SL of the VIOLATION and, if applicable, the CP.
3. If escalated action is to be considered, coordinate with the Regional Enforcement Coordinator to prepare for an enforcement panel. The VIOLATION may be characterized as an AV in the inspection report, until final enforcement action is determined.
4. The VIOLATION will be dispositioned separately from the FINDING, assuming that a FINDING is confirmed.

**Confirmed TE VIOLATION**  
Disposition TE VIOLATION IAW Enf. Policy  
(Continue PD Screen @ Block 9)

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**Figure 3 Additional Guidance - Less Frequently Anticipated Pathways**

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**Block 39, Figure 3**

1. GREEN LICENSEE-IDENTIFIED FINDINGS are not considered in the ROP assessment process nor are they evaluated for CCAs.
2. If the FINDING is not a VIOLATION, the FINDING is of very low safety significance, and the licensee has correctly evaluated the FINDING and has developed appropriate corrective actions, then the FINDING is not normally documented in the inspection report.

Exit - No further  
Evaluation or DOC

Inspector judgment is necessary in determining whether the licensee has correctly evaluated the FINDING and has developed appropriate corrective actions. It may be necessary to consider:

- a. the urgency of addressing the FINDING,
- b. time elapsed following the licensee becoming aware of the FINDING,
- c. agency requirements and expectations regarding timeliness and adequacy of corrective actions
- d. licensee CAP requirements and licensee expectations
- e. licensee's expressed intent to address or oppose the FINDING
- f. other factors, as appropriate

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**Block 43, Figure 3**

1. GREEN LICENSEE-IDENTIFIED FINDINGS that involve VIOLATIONS are documented in accordance with the [ENFORCEMENT POLICY](#) and the [ENFORCEMENT MANUAL](#) and in accordance with [IMC 0612](#) Section 0612-10 "DOCUMENTING LICENSEE-IDENTIFIED VIOLATIONS" as follows:
  - a. If the licensee has correctly evaluated the FINDING and has developed appropriate corrective actions, then the VIOLATION is briefly described in Section 4OA7 of the inspection report.

DOC  
ABBREVIATED  
FINDING in 4OA7  
- No CCA -

Inspector judgment is necessary to make the above determination. It may be necessary to consider:

- i. the urgency of addressing the FINDING,
  - ii. time elapsed following the licensee becoming aware of the FINDING,
  - iii. agency and licensee CAP requirements and expectations regarding timeliness and rigor of corrective actions,
  - iv. licensee's expressed intent to address or oppose the FINDING, and
  - v. other factors, as appropriate.
- b. The ABBREVIATED FINDING description will include:
- i. the requirement violated,
  - ii. how it was violated,
  - iii. the licensee's corrective action tracking number(s), and
  - iv. a very brief justification why the VIOLATION is not greater than GREEN.
- c. A complete reconstruction of the SDP logic is not required. However, Section 40A7 must include the following introductory paragraph:
- "The following VIOLATIONS of very low safety significance (Green) or Severity Level IV were identified by the licensee and are VIOLATIONS of NRC requirements which meet the criteria of the NRC [ENFORCEMENT POLICY](#), for being dispositioned as a NCV."
2. The safety significance and enforcement of LICENSEE-IDENTIFIED NCVs should be discussed per [IMC 0612](#) Section 0612-10 "DOCUMENTING LICENSEE-IDENTIFIED VIOLATIONS" and not in the LER closeout section. A statement, such as "The enforcement aspects of this finding are discussed in Section 40A7," should be included in the LER closeout section.
3. LICENSEE-IDENTIFIED NCVs are not documented in the summary of FINDINGS. However, if a GREEN or Severity Level IV LICENSEE-IDENTIFIED FINDING resulted in a VIOLATION, include the following boilerplate paragraph as the last paragraph of the summary of findings:
- "Violations of very low safety significance or severity level IV that were identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's CAP. These violations and corrective action tracking numbers are listed in Section 40A7 of this report."
4. NOTE: In accordance with the [ENFORCEMENT POLICY](#), the approval of the Director, Office of Enforcement, with consultation with the Deputy Executive Director as warranted, is required for dispositioning WILLFUL VIOLATIONS as NCVs.

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**Block 44, Figure 3**

[IMC 0612](#) defines:

1. To Be Determined (TBD) is the inspection report characterization that is required by [IMC 0609 'Significance Determination Process.'](#) if the staff's significance determination of a FINDING is not complete at the time of issuance of the inspection report, and not reviewed by the SERP. Final significance determination should be completed within 90 days from the issue date of the first official correspondence that describes a FINDING as TBD. Upon resolving the FIN (TBD) or AV, the screening process resumes at Block 42 (which will now be answered 'yes')."
2. APPARENT VIOLATION (AV) as a VIOLATION of regulatory requirements that is being considered for potential ESCALATED ENFORCEMENT ACTION. See "Documenting Potential ESCALATED ENFORCEMENT ACTIONS" in the [ENFORCEMENT MANUAL](#) for additional insights.
3. Preliminary Greater than Green as a FINDING that has been reviewed by the Significance and Enforcement Review Panel (SERP) as described in Attachment 1 to Manual Chapter 0609. Until the significance of a FINDING has been finalized, it may be characterized in an inspection report as an AV, if a VIOLATION is involved, or as a FINDING (FIN) to-be-determined (TBD) if no VIOLATION is being considered.

DOC  
FIN (TBD) or AV  
Re-enter at Block 42

---

**Block 46, Figure 3**

See Block 18, Figure 3, for additional applicable guidance (with the exception that no CCA is documented).

DOC FINDING  
& Associated  
VIOLATION  
- No CCA -

## CORNERSTONE OBJECTIVES AND ATTRIBUTES TABLES

<b>Cornerstone</b>		<b>REACTOR SAFETY – Initiating Events</b>
<b>Objective</b>	To limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations.	
<b>Attributes</b>	<b>Areas to Measure</b>	
Design Control	Initial Design and Plant Modifications	
Protection Against External Factors	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Switchyard Activities, Grid Stability	
Configuration Control	Shutdown Equipment Lineup, Operating Equipment Lineup	
Equipment Performance	Availability, Reliability, Maintenance; Barrier Integrity (SGTR, ISLOCA, LOCA (S,M,L)), Refueling/Fuel Handling Equipment	
Procedure Quality	Procedure Adequacy (Maint, Test, Ops)	
Human Performance	Human Error	

<b>Cornerstone</b>		<b>REACTOR SAFETY – Mitigating Systems</b>
<b>Objective</b>	To ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage).	
<b>Attributes</b>	<b>Areas to Measure</b>	
Design Control	Initial Design and Plant Modifications	
Protection Against External Events	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Seismic, Weather	
Configuration Control	Shutdown Equipment Lineup, Operating Equipment Lineup	
Equipment Performance	Availability, Reliability	
Procedure Quality	Operating (Post Event) Procedures (AOPs, SOPs, EOPs); Maintenance and Testing (Pre-event) Procedures	
Human Performance	Human Error (Post Event), Human Error (Pre-event)	



<b>Cornerstone</b>		<b>REACTOR SAFETY – Barrier Integrity</b>
<b>Objective</b>	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.	
<b>Attributes</b>	<b>Areas to Measure (to Maintain Functionality of Fuel Cladding)</b>	
Design Control	Physics Testing; Core Design Analysis (Thermal Limits, Core Operating Limit Report, Reload Analysis, 10 CFR50.46)	
Configuration Control	Reactivity Control (Control Rod Position, Reactor Manipulation, Reactor Control Systems); Primary Chemistry Control; Core Configuration (Loading)	
Cladding Performance	Loose Parts (Common Cause Issues); RCS Activity Level	
Procedure Quality	Procedures which could impact cladding	
Human Performance	Procedure Adherence (FME, Core Loading, Physics Testing, Vessel Assembly, Chemistry, Reactor Manipulation); FME Loose Parts, Common Cause Issues	
<b>Attributes</b>	<b>Areas to Measure (to Maintain Functionality of RCS)</b>	
Design Control	Plant Modifications	
Configuration Control	System Alignment; Primary/Secondary Chemistry	
RCS Equipment and Barrier Performance	RCS Leakage; Active Components of Boundary (Valves, Seals); ISI Results	
Procedure Quality	Routine OPS/Maintenance procedures; EOPs and related Off-Normal Procedures invoked by EOPs	
Human Performance	Routine OPS/Maintenance Performance; Post Accident or Event Performance	
<b>Attributes</b>	<b>Areas to Measure (to Maintain Functionality of Containment)</b>	
Design Control	Plant Modifications; Structural Integrity; Operational Capability	
Configuration Control	Containment Boundary Preserved; Containment Design Parameters Maintained	
SSC and Barrier Performance	S/G Tube Integrity, ISLOCA Prevention; Containment Isolation, SSC Reliability /Availability, Risk Important Support Systems Function	
Procedure Quality	Emergency and Operating Procedures; Risk Important Procedures (OPS, Maintenance, Surveillance)	
Human Performance	Post Accident or Event Performance; Routine OPS/Maintenance Performance	
<b>Attributes</b>	<b>Areas to Measure (to Maintain Radiological Barrier Functionality of</b>	

<b>Cornerstone</b>		<b>REACTOR SAFETY – Barrier Integrity</b>
<b>Objective</b>	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.	
	<b>Control Room and Auxiliary Building</b> - PWR, and Standby Gas Trains - BWR only)	
Design Control	Plant Modifications; Structural Integrity	
Configuration Control	Building Boundaries Preserved	
SSC and Barrier Performance	Door, Dampers, Fans, Seals, Instrumentation	
Procedure Quality	EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures	
Human Performance	Post Accident or Event Performance; Routine OPS/Maintenance Performance	
<b>Attributes</b>	<b>Areas to Measure</b> (to Maintain Functionality of <b>Spent Fuel Pool Cooling System</b> )	
Design Control	Plant Modifications; Structural Integrity	
Configuration Control	System Alignment	
SSC Performance	Pumps, Valves, Instrumentation	
Procedure Quality	EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures	
Human Performance	Post Accident or Event Performance; Routine OPS/Maintenance Performance	

<b>Cornerstone</b>		<b>REACTOR SAFETY – Emergency Preparedness</b>
<b>Objective</b>	To ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.	
<b>Attributes</b>	<b>Areas to Measure</b>	
ERO Readiness	Duty Roster; ERO Augmentation System; ERO Augmentation Testing; Training	
Facilities and Equipment	ANS Testing; Maintenance Surveillance and Testing of Facilities, Equipment and Communications Systems; Availability of ANS, Use in Drills and Exercises	
Procedure Quality	EAL Changes, Plan Changes; Use in Drills and Exercises	
ERO Performance	Program Elements Meet 50.47(b) Planning Standards, Actual Event Response; Training, Drills, Exercises	
Offsite EP	FEMA Evaluation	

<b>Cornerstone</b>		<b>RADIATION SAFETY – Occupational Radiation Safety</b>
<b>Objective</b>	To ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation.	
<b>Attributes</b>	<b>Areas to Measure</b>	
Plant Facilities/Equipment and instrumentation	Plant Equipment Instrumentation, (ARM Cals & Availability, Source Term Control), Procedures (Radiation Protection and Maintenance)	
Program & Process	Procedures (HPT, Rad Worker, ALARA); Exposure/Contamination Control and Monitoring (Monitoring and RP Controls); ALARA Planning (Management Goals, Measures - Projected Dose)	
Human Performance	Training (Contractor HPT Quals, Radiation Worker Training, Proficiency)	

<b>Cornerstone</b>		<b>RADIATION SAFETY – Public Radiation Safety</b>
<b>Objective</b>	To ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain as a result of routine civilian nuclear reactor operation.	
<b>Attributes</b>	<b>Areas to Measure</b>	
Plant Facilities/Equipment and instrumentation	Process Radiation Monitors (RMS) (Modifications, Calibrations, Reliability, Availability), REMP Equipment, Meteorology Instruments, Transportation Packaging; Procedures (Design/Modifications, Equipment Calculations, Transportation Packages, Counting Labs)	
Program & Process	Procedures (Process RMs & REMP, Effluent Measurement QC, Transportation Program, Material Release, Meteorological Program, Dose Estimates); Exposure and Radioactivity Material Monitoring and Control (Projected Offsite Dose, Abnormal Release, DOT Package Radiation Limits, Measured Dose)	
Human Performance	Training (Technician Qualifications, Radiation & Chemical Technician Performance)	

<b>Cornerstone</b>		<b>SAFEGUARDS – Security</b>
<b>Objective</b>	To provide assurance that the licensee's security system and material control and accountability program use a defense-in-depth approach and can protect against (1) the design basis threat of radiological sabotage from external and internal threats, and (2) the theft or loss of radiological materials.	
<b>Attributes</b>	<b>Areas to Measure</b>	
Physical Protection System	Protected Areas (Barriers, Alarms, Assessment); Vital Areas (Barriers, Alarms, Assessment)	
Access Authorization	Personnel Screening; Behavior Observations; Fitness for Duty	
Access Control	Search; Identification	
Response to Contingency Events	Protective Strategy; Implementation of Protective Strategy	
Material Control and Accounting	Records; Procedures; Inventories	

**ATTACHMENT 1**  
**Revision History for APPENDIX B to IMC 0612 - Issue Screening**

<b>Commitment Tracking Number</b>	<b>Issue Date</b>	<b>Description of Change</b>	<b>Training Needed</b>	<b>Training Completion Date</b>	<b>Comment Resolution Accession Number</b>
N/A	11/01/2006	Revision history reviewed for the last four years.	NO	N/A	N/A
N/A	04/29/2002 CN 02-021	Appendix B was removed as an attachment to IMC-0612 and was issued as stand alone document.	NO	N/A	N/A
N/A	05/19/2005 CN 05-014	Revised to add Question No. 5 to Minor Questions in Section 3 and Question No. 6 to the SDP Questions in Section 4 to reflect the new maintenance risk assessment and risk management SDP, IMC 0609, Appendix K, "Maintenance Rule Risk Assessment and Risk Management."	NO	N/A	N/A
N/A	09/30/2005 CN 05-028	Revised to clarify the definition of a performance deficiency and a functionality of the control room. Also, the auxiliary building attribute was added to the cornerstone and objective section.	NO	N/A	N/A

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	11/02/06 CN 06-033	Revised definition of performance deficiency to bring the definition in alignment with the basis for performance deficiency as described in ROP basis document, IMC-0308 attachment 3, "Significance Determination Process Basis Document."	YES	09/06/2006	ML063000483
N/A	09/20/07 CN 07-029	Revised flow chart and Section 3 guidance to address feedback forms. Corrected formatting error on page B-7.	NO	N/A	N/A
N/A	12/04/08 CN 08-034	Revised Guidance and Flow Chart to be consistent with changes to IMC 0612. Updated Cornerstone Objectives and Attributes to be consistent with IMC 0308.	Yes	12/03/2008	ML083220751
N/A	12/24/09 CN 09-032	Rewrite Guidance and Flow Charts to: <ol style="list-style-type: none"> <li>1. Implement enhanced Traditional Enforcement (TE) integration in ROP</li> <li>2. Enhance organization and access</li> <li>3. Incorporate IMC 0305 Cross-Cutting Aspect inspection guidance</li> <li>4. Address (in part) the following 0612-related ROP Feedback: <ol style="list-style-type: none"> <li>a. 1303 - enhance App E Maintenance Rule (MR) examples, remove MR specifics from App B</li> <li>b. 1355 –enhance Performance Deficiency guidance (e.g. what</li> </ol> </li> </ol>	Yes	12/10/2009	ML091480470

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
		<p>constitutes a "standard")</p> <ul style="list-style-type: none"> <li>c. 1362 - enhance MR minor screening guidance (see 1303)</li> <li>d. 1366 - enhance minor screening guidance for improved consistency</li> <li>e. 1398 - improve alignment between 0612 and Enforcement Policy (e.g. minor TE Violations)</li> <li>f. 1418 – enhance minor screening guidance to reduce subjectivity per 2008 Consolidated ROP Internal Self-assessment (CRIS-08)</li> <li>g. 1419 - enhance guidance for differentiating self-revealing vs. NRC- vs. License ID per CRIS-08</li> <li>h. 1425 - resolve CCA guidance cross-reference errors</li> </ul> <p>5. Consolidate screening guidance from Section 0612-05 'Screening Inspection Results,' of IMC 0612-proper into Appendix B screening guidance.</p>			