
INSPECTION MANUAL CHAPTER 1120

PRELIMINARY NOTIFICATIONS

1120-01 PURPOSE

To provide instructions to regional and headquarters (HQ) program offices for promptly sharing new or updated information about significant events occurring at facilities or relating to activities licensed by the Nuclear Regulatory Commission (NRC) or an Agreement State.

1120-02 OBJECTIVES

The objectives of the preliminary notification (PN) system is to promptly provide new or updated information to internal and external stakeholders (i.e., the Commission, the public, NRC or Agreement State management, and/or other state and local governmental officials) regarding events at NRC-licensed facilities that are of: a) significant safety or safeguards concern, and/or b) potentially high public interest. A PN should not be issued if the same information is already included in a separate notification, such as NRC Event Notification (EN). A PN should be also be considered to provide additional or updated time-sensitive information to stakeholders in a timelier fashion than longer term license notification requirements such as the 60-day time requirement for issuance of a licensee event report (LER).

1120-03 POLICY

02.01 Implementation. PNs will be made for all matters that meet the objectives above and that meet the criteria specified in this manual chapter (see Sections 1120-07).

02.02 Issuing office. A PN will be issued by the NRC regional or HQ office that receives information about significant events. Regional offices usually have jurisdiction over the issuance of PNs for events occurring in the regions, including events that are first reported to the Headquarters Operations Officer.

1120-04 DEFINITIONS

Preliminary Notification (PN) - An early notice of an event or issue of high possible safety or safeguards significance, generic interest, or public interest. PNs provide NRC senior management with expedited initial or updated information regarding such events where information may not otherwise be reported or where licensee reporting may be delayed. Efforts should be made to provide clear and accurate information; however, verification and evaluation efforts must be balanced with the need to provide timely information.

1120-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Regional Administrators, Headquarters Office Directors, or Designees

- a. Evaluate the information received to determine if an event or issue meets the criteria for issuing a PN (see Section 1120-07).
- b. Prepare, review, and approve PNs prior to issuance. Assure, as appropriate and when practical, that the accuracy of technical information included in the PN has been confirmed with licensee management before the PN is issued.
- c. Assure that PNs are promptly distributed electronically to designated offices (See Section 1120-10).
- d. Promptly inform the appropriate HQ program office(s), along with the Office of Public Affairs (OPA), the Office of Congressional Affairs (OCA), Regional State Liaison Officers, and Regional State Agreement Officers of the issuance of a PN.

05.03 Generic Communications and Operating Experience Branch (IOEB), NRR/DRO

- a. Maintain the electronic distribution list for PNs in the Outlook Global Address Book under PN_Distribution.
- b. Coordinate with NSIR to maintain a separate distribution list for security-related PNs in the Outlook Global Address Book under PN_Distribution_Security.
- c. Review each PN against the criteria contained in Management Directive 8.1, "Abnormal Occurrence Reporting Procedure," and take the prescribed actions.

05.04 Office of the Chief Information Officer (OCIO)

- a. Publish each publicly available PN to the NRC public website.
- b. Provide IOEB with access to edit the PN_Distribution and PN_Distribution_Security lists in the Outlook Global Address Book.

1120-06 NUMBERING OF PRELIMINARY NOTIFICATIONS

Each PN is designated by an alphanumeric code specifying the issuing organization (I, II, III, IV, H or IIT), the year of issuance, and the sequential number of the PN in that year. PNO-II-12-03 is the third PN issued by Region II in 2012. The designation H is for HQ and IIT is for Incident Investigation Team.

If subsequent PNs are to be issued to update or correct a previously issued PN, the original PN number is retained and a letter added to the end of the number to indicate the supplement. For example, PNO-IV-12-02B is the second supplement of PNO-IV-12-02.

1120-07 CRITERIA FOR ISSUING A PRELIMINARY NOTIFICATION

NOTE: A PN does not need to be issued if other official notification such as an EN is made covering the same event. If such a notification is submitted, a PN should be issued to communicate significant new information that was not included in the EN if it warrants being made available prior to longer term notification requirements such as the 60-day time requirement for issuance of an LER.

- a. Criteria for any NRC or Agreement State Licensee:
1. Events which prompt a licensee to declare an alert, site area emergency, or general emergency; and unusual events which may be of significant interest to the news media, other government agencies, or the public.
 2. Serious natural phenomena occurrences and their impacts to facilities. Examples include (1) anticipated shutdown of a nuclear power plant (NPP) because of a hurricane; (2) shutdown of a research reactor due to an earthquake; (3) reduction of power at a NPP due to drought; (4) assessment of the effects of an earthquake near an Independent Spent Fuel Storage Installation (ISFSI); (5) major damage to a licensed facility resulting from a tornado.
 3. Fires or explosions that: (1) affect safety-related equipment, (2) cause damage to nuclear power plants or other NRC-licensed facilities resulting in a shutdown, or (3) would be expected to cause such a shutdown if the plant were in operation.
 4. Significant operational events, such as valid actuation of the emergency core cooling system, abnormal depressurization, pipe breaks or leaks, malfunction of relief valves resulting in pressure transients, or failure of emergency generators, which cause or are expected to cause a plant shutdown in excess of 7 days.
 5. Any significant operational problem concerning reactivity, such as inadvertent criticality or uncontrolled reactivity excursions. For fuel cycle facilities, this includes any significant loss of criticality safety controls.
 6. Significant non-reactor events such as safety equipment failures during operations, damage to portable gauges resulting in unshielded sources, or ruptured well logging sources, that cause or have the potential to cause harmful exposure to ionizing radiation.
 7. Significant operating experience issues that need to be shared with NRC management, the public, and other external stakeholders in a timely manner. These include generic issues that may eventually become the subject of an NRC Generic Communication, but due to their potential immediate safety significance should be communicated quickly.¹

Note: When PNs are issued under the above criteria, a supplemental PN should be considered, particularly for plant events that result in an NRC reactive inspection. If the significant event resulted in a plant shutdown, any supplemental PN should be issued prior to plant restart if possible (See Section 1120-11 for more information).

¹ Authority to issue PNs under this criterion is delegated to the Director, Division of Reactor Oversight

b. Dose/Contamination Criteria:

1. Any contamination event requiring an NRC reactive inspection.
2. Occupational dose or probable occupational dose in excess of the limits in 10 CFR 20.1201, 1206, 1207, and 1208.
3. A public dose or probable public dose in excess of the limits in 10 CFR 20.1301.
4. Significant environmental events, such as releases immediately reportable under 10 CFR 20.2202 or events which violate NRC or Agreement State regulatory requirements.
5. **Lost or stolen licensed material reportable under 10 CFR 20.2201(a)(1)(i) or 10 CFR 37.57(a). A PN is not required for lost or stolen portable moisture density gauges, gas chromatographs, static eliminators, explosive/chemical agent detectors, and other devices or material posing minimal safety hazard.**
6. An event at an NRC or Agreement State licensed facility (including facilities issued a construction permit) that results in a serious injury to a contaminated person or a fatality. A PN is not appropriate for serious injuries involving uncontaminated persons.
7. Significant medical events reported under Subpart M of 10 CFR 35.

c. Transportation Event Criterion:

1. Significant transportation incidents such as those involving significantly damaged, leaking, lost Type B or fissile packages, or those involving high public interest (i.e., major highway closing, etc.).
2. **Actual or attempted theft, diversion, or sabotage involving shipments of special nuclear material, spent nuclear fuel, or Category 1 or Category 2 radiological material defined by 10 CFR 37.**

d. Security Event Criterion:

Events of security significance directed toward or occurring within NRC or Agreement State licensed facilities or information concerning threats to licensees such as actual or apparent breaches of security systems, actual or threatened sabotage, malicious mischief or vandalism, bomb threats, arson, theft, discovery or discharge of firearms, and demonstrations resulting in arrests or violence. PNs related to security events should be appropriately marked as to their sensitivity. The distribution list for security-related PNs should be modified to ensure that only recipients with a need to know are included.

e. Inventory Event and Inventory Difference (ID) Criteria:

1. For licensees subject to 10 CFR 70.51(e), ID that exceed both 300 grams of U-235 and 1.5 times the prescribed limit of error of inventory differences (LEID).

2. For licensees subject to 10 CFR 74.31, ID that exceed the licensee's detectable threshold value.
3. For licensees subject to 10 CFR 74.51, ID that exceed both 300 grams of U-235 and 3 times the standard error of inventory differences (SEID).

Consistent with PNs related to security events, these PNs should be appropriately marked as to their sensitivity. The distribution list should be modified to ensure that only recipients with a need to know are included.

f. Other Miscellaneous Criteria:

1. **Strikes of employees at any major licensed facility (e.g., power reactor, fuel cycle facility, ISFSI, or decommissioning power reactor site that still contains NRC-licensed material).**
2. Other significant events related to licensed activities in which national, state, or local news media interest already exists, or as deemed appropriate when media interest is expected but not certain, as well as updated information on events related to licensed activities that have previously attracted media attention.
3. Significant fitness-for-duty events reportable under 10 CFR 26.73.

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

1120-08 FORMAT OF PRELIMINARY NOTIFICATION

08.01 General. The format and content of a PN are shown in Exhibit 1. To facilitate the preparation of a PN, and to have a consistent format for electronic transmission and ultimate processing by recipients, the issuing office will use ADAMS template NRC-004 (available in ADAMS ML031150184) "NRC Preliminary Notification of Occurrence (PNOs)." Each issuing office shall track and maintain their respective numbering systems (see Section 1120-06).

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

- a. The heading "PRELIMINARY NOTIFICATION" must be included at the top of the page.
- b. Date of issuance.
- c. PN number (see Section 1120-06)
- d. An introductory, boilerplate statement must be included in all PNs similar to the following:

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. Some of the information may not yet be fully verified or evaluated by the Region [I/II/III/IV] staff.

- e. Facility - Identify the facility, its location (city/state) and the licensee.
- f. Subject - Enter a brief, one-line description of the matter.
- g. Report Content - The body of the PN contains a brief factual description of the problem or event including the time and date of occurrence, and plant, buildings, areas or systems affected by the occurrence. The PN also should describe any controls, protective measures or actions taken to minimize the magnitude of the event or its effects. PNs should avoid speculation.

When practical and appropriate, the accuracy of technical information should be confirmed with the licensee. The preparation of PNs for such situations poses special challenges because it may not be possible to obtain all needed information in a timely manner. In such situations, a PN may be issued without all of the needed information and later supplemented when additional information becomes available.

Issuing offices should attempt to include the following when applicable:

- 1. Radionuclides of concern
 - 2. Actual or estimated quantity of release
 - 3. Dose estimate, dose rate estimate, percentage of Technical Specifications (TS) or 10 CFR 20 limit, or some other means of interpreting the significance of the release or exposure
 - 4. Areas involved (restricted, unrestricted, or owner controlled)
 - 5. Expected media interest
 - 6. When reference is made to a regional office, that office should be identified by location as well as by number the first time it is used in each PN.
 - 7. The title of individuals should be used when it is necessary to specify an individual. PNs should not include the names of licensee employees. An exception to this is when individual names are important to the notification and the names have previously been provided to the public.
 - 8. If State Program Offices or other affected organizations have been notified, identify the states or organizations, and the method of notification.
- h. ADAMS Accession Number (ML# from the Main library)
 - i. Contact(s) - The PN should include the names, telephone numbers, and e-mail addresses of individuals who can supply additional information if needed.

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

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

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

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

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

1120-09 ACTIONS FOLLOWING RECEIPT OF INFORMATION

09.01 When an associated EN is not issued or not expected to be issued, a PN should be prepared and distributed as soon as possible following the initial receipt of the information. When an associated EN is issued or expected to be issued, a PN should be prepared and distributed as soon as practical when significant information is obtained that was not included in the EN but warrants distribution prior to the issuance of an associated LER or inspection report. Such information may include event causes, operational errors, unexpected plant conditions or response, equipment damage, conditions complicating recovery, reactive inspections, etc.

09.02 The appropriate regional administrator or HQ office director, or their designee, notifies the Office of Public Affairs by direct contact when a PN is being issued that has direct or indirect connection with Agreement States and involves radioactive materials (primarily exposures, transportation accidents, theft of sources, etc.).

09.03 If the NRC enters the Activated mode of incidence response, incidence response communications will serve in lieu of supplemental PNs. A final PN is issued to note the disposition of the NRC response once normal operations resume.

1120-10 DISTRIBUTION OF PRELIMINARY NOTIFICATIONS

10.01 The issuing office shall distribute PNs. The distribution should at a minimum consist of the basic distribution list maintained as PN_Distribution or PN_Distribution_Security for security-related PNs (see Section 1105-05). Each office is responsible for notifying IOEB of any changes to the basic distribution list. The issuing office may include recipients beyond the basic distribution list as it determines is appropriate.

1120-11 SUPPLEMENTAL PRELIMINARY NOTIFICATION

Supplemental PNs are normally issued when it is necessary to promptly notify the Commission and other NRC management of additional or corrected information relating to a significant matter previously described in a PN. This may occur, for example, if the situation previously described in a PN worsens significantly or if the information in a PN is determined to be

incorrect. Supplemental PNs may also be warranted where the necessary information may be slow in developing (see Section 1120-08).

A supplemental PN should also be issued when the original PN was issued due to significant operational events or problems at a nuclear plant (see Section 1120-07). This supplemental PN should be issued prior to plant restart if possible to ensure the Commission, NRC management, and the public are informed of how the issues were resolved prior to plant restart.

1120-12 DISPOSITION OF MATTER PRESENTED IN PRELIMINARY NOTIFICATIONS

It is not necessary that the resolution of a matter be reported through the issuance of subsequent PNs. Tracking and closure of PNs is not required. Resolution of issues communicated by PNs is accomplished through licensee reporting and follow-up inspections by the NRC.

END

Exhibit 1

EXAMPLE: PRELIMINARY NOTIFICATION

August 14, 2020

PRELIMINARY NOTIFICATION OF EVENT OR UNUSUAL OCCURRENCE - PNO-III-20-003

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. Some of the information may not yet be fully verified or evaluated by the Region III staff on this date.

| <u>Facility</u> | <u>Licensee Emergency Classification</u> |
|----------------------------|---|
| Duane Arnold Energy Center | <input checked="" type="checkbox"/> Notification of Unusual Event |
| NextEra Energy, Inc. | <input type="checkbox"/> Alert |
| Palo, IA | <input type="checkbox"/> Site Area Emergency |
| Docket No: 50-331 | <input type="checkbox"/> General Emergency |
| | <input type="checkbox"/> Not Applicable |

Subject: NOTICE OF UNUSUAL EVENT AND UNPLANNED SHUTDOWN GREATER THAN 72 HOURS DUE TO LOSS OF OFFSITE POWER FROM SEVERE WEATHER EVENT

On August 10, 2020, at approximately 12:45 p.m. (all times CDT), severe thunderstorms and high winds approached the Duane Arnold Energy Center (DAEC) and caused an offsite power grid perturbation, which led to an automatic start of both DAEC Emergency Diesel Generators (EDGs). The plant was operating at the time.

At 12:49 p.m., the severe weather damaged the offsite power lines resulting in a loss of offsite power to the plant, leading to an automatic reactor shutdown. All rods inserted and cooling was addressed via the Reactor Core Isolation Cooling (RCIC) system. With the EDGs already running, onsite essential equipment was automatically powered and maintained without issue. Plant safety parameters remained stable throughout the event.

At 12:58 p.m., the licensee declared a Notice of Unusual Event due to the loss of offsite power. No injuries occurred onsite and there was no impact on public health or safety.

On August 11, 2020, at 1:35 p.m., one source of offsite power was restored to the DAEC essential buses and the EDGs were placed in standby. Later that day, at 4:00 p.m., DAEC exited the Unusual Event. The reactor was safely cooled down and remains shutdown.

The licensee continues working to restore all offsite power lines to the site and assess potential damage from the storm.

The NRC Senior Resident Inspector responded to the site and verified that required safety functions were maintained. Additional NRC inspectors from Region 3 assisted in response and are continuing to monitor licensee actions to restore offsite power, independently assess any issues caused by the storms, and review the licensee's actions in response to the weather event.

This preliminary notification is issued for information only.

The State of Iowa has been notified.

The information presented herein has been discussed with the licensee and is current as of 09:00 a.m. on August 14, 2020.

ADAMS Accession Number: ML20227A083

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Attachment 1

Revision History for IMC 1120

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Description of Training Required and Completion Date | Comment Resolution and Closed Feedback Form Accession Numbers (Pre-Decisional, Non-Public Information) |
|----------------------------|---|--|--|--|
| N/A | ML040210284 12/16/03 CN 03-041 | Revised to reflect current usage of the WordPerfect software, and current NRC organizations. | N/A | ML032810659 |
| N/A | 06/12/06 | Revision history reviewed for last four years | N/A | N/A |
| N/A | ML061650092 06/22/06 CN 06-014 | Revised to further enhance public confidence by requesting issuance of a supplemental preliminary notification (PN) when the original PN was issued due to a plant shutdown caused by significant operational events or problems. Revised to reflect organizational changes and make other editorial changes. Also, Exhibit 2 was removed. | N/A | ML061630401 |
| N/A | ML091210017 06/09/09 CN 09-014 | Revised to remove all references to Morning Reports and add FSME as a program office. Section 07 Criteria rewritten and categorized by type of event. Deleted some outdated criteria (i.e., initial criticality, construction delays, etc) | N/A | ML091320025 |

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Description of Training Required and Completion Date | Comment Resolution and Closed Feedback Form Accession Numbers (Pre-Decisional, Non-Public Information) |
|----------------------------|---|---|--|--|
| N/A | ML13193A057 09/13/13 CN 13-021 | Revised in response to feedback forms 0737 and 1810. Section 04, written PN is no longer required following a Commissioners' Assistants Briefing. Removed references to State and Tribal Programs. Clarified language in Section 07-b. Deleted paragraph 08.01. Clarified language in Section 10.01 and 10.02. Changed Exhibit 1 to match wording in Section 09.02. | N/A | 1120-1737 ML13197A138 1120-1810 ML13197A143 |
| N/A | ML20307A134 01/05/21 CN 21-001 | Periodic update. Updated to reflect changes in office organization. Edited for clarity throughout the IMC that PNs are used to provide any substantive updates if an associated EN is issued. Clarified language in Section 07 Criteria. Eliminated oral PNs as verbal notifications are covered by other processes. Provided a more recent example of a PN. | N/A | ML20307A140 |