

# NRC INSPECTION MANUAL

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INSPECTION MANUAL CHAPTER 0040

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PREPARATION, REVISION, ISSUANCE, AND ONGOING OVERSIGHT  
OF NRC INSPECTION MANUAL DOCUMENTS

Effective Date: 01/17/2023

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## 0040-01 PURPOSE

The Inspection Manual (IM) is the official agency document that contains the inspection manual chapters (IMCs), inspection procedures (IPs), temporary instructions (TIs), technical guidance (TG), operating experience smart samples (OpESS) and change notices (CNs) used by the agency to implement the Nuclear Regulatory Commission (NRC) inspection program. Documents are stored in the Agencywide Documents Access and Management System (ADAMS) as official agency records. Current, superseded, and obsoleted NRC documents are permanent agency records and follow the disposition schedule found in NUREG-0910.

Each document within the IM is associated with an originating office that is responsible for maintaining its technical integrity—specifically, the Office of Nuclear Reactor Regulation (NRR), the Office of Nuclear Material Safety and Safeguards (NMSS), and the Office of Nuclear Security and Incident Response (NSIR). Within NRR, documents are associated with originating organizations (normally branches) that are responsible for ensuring the technical integrity of the document and for verifying that the document is current.

IMC 0040 provides instructions and guidance applicable to all NRC offices on the types of IM documents, requirements on solicitation of comments related to document changes, the roles and responsibilities for IM processing, the process for issuing IM documents, and the requirement for periodic review of inspection guidance documents.

## 0040-02 OBJECTIVES

- 02.01 Provides clear guidance in the process for developing, issuing, and revising all NRC IM documents issued by the various NRC Offices that manage and oversee inspection programs: NMSS, NRR, and NSIR.
- 02.02 Specifies responsibilities and authorities for developing, issuing, and revising IM documents including the requirement for periodic, formal review of those documents.
- 02.03 Provides clear and concise written expectations to ensure alignment and consistent understanding of expectations for NRC staff who have responsibility for developing and maintaining Reactor Oversight Program (ROP) documents.
- 02.04 Establishes the basic requirements and governing format for IM documents—IMCs and IPs (including stand-alone appendices and attachments), TIs, and OpESSs.
- 02.05 Provides guidance in the use and structure of internal, non-public documents used in the process of revising and issuing IM documents; these documents include the document for comment and issuance memoranda, comment resolution summary, document issuing form (DIF), and 5-year review checklist.
- 02.06 Provides best practice guidance for maintaining relevance of IM documents.

## 0040-03 DEFINITIONS

Originating Organization. The NRC program office, division, and/or branch responsible for the policy and technical content of an IM document, including its creation, revision, or deletion. (section 04.02)

### 03.01 Types of Inspection Manual Documents

A standalone table of contents, inspection manual chapter, inspection procedure, temporary instruction, operating experience smart sample, technical guidance, 10 CFR guidance, feedback form, comment resolution summary, and change notice are all considered types of IM documents.

**Note: Further instruction, standards, and examples are indicated with the section number in parenthesis; these references are implied to be in this document unless specified otherwise.**

- a. **Standalone Table of Contents (TOC)**. This standalone document provides the structure of the entire Inspection Manual (IM) in outline format and lists the IM's active program documents along with the latest revision date and the change notice that issued the document. Reference Only documents are indicated with an "R" at the end of the entry. Certain document numbers and titles are reserved for future development and are labeled as "RESERVED."
- b. **Inspection Manual Chapter (IMC)**. A document containing written administrative or inspection program statements of policy. IMCs state the purpose, objectives, applicability, definitions, responsibilities and authorities, and basic requirements for inspection programs. An IMC for an inspection program defines the program through a listing of inspection procedures, which is normally appended to the IMC. To aid with navigation, some longer IMCs contain a TOC. (exhibits 1 and 6.1) (section 08.01)
- c. **Inspection Procedure (IP)**. A document containing inspection objectives, requirements, and specific guidance for inspection activities—which are focused on safety, security, or safeguards—and are performed by an inspector or technical staff. IPs also identify the applicable program, list the inspection and/or administrative requirements, detail what constitutes procedure completion, and estimate the resources needed. (exhibits 1 and 6.4) (section 08.02)
- d. **Baseline Inspection Procedures**. A document containing the components of an IP and specific guidance for operating reactor baseline inspection activities. Baseline inspection procedures define the minimum level of inspections that all plants will receive regardless of performance, and it includes specific sample requirements in addition to an estimate of resources needed. For revisions to IPs, see section 05.03. (exhibits 6.4 and 6.5) (section 08.03)
- e. **Temporary Instruction (TI)**. A temporary inspection procedure that is focused on current safety issues or concerns that are not currently addressed by established IPs or IMCs. TIs are typically limited in time or by completion of specific inspections. (exhibit 6.6) (sections 07.02 and 08.04)
- f. **Operating Experience Smart Sample (OpESS)**. A document used to integrate operating experience (OpE) into the ROP inspection process. The OpESS makes relevant OpE more accessible to inspectors in the form of a detailed synopsis of selected issues determined to have potential generic safety implications. OpESS's inform and enhance ROP inspection samples within existing ROP inspection procedure requirements and level of effort. Additional information is provided in IMC 2523, "NRC Application of Operating Experience." (exhibit 6.7) (section 8.05)

g. **Guidance documents**

1. **Technical Guidance (TG)**. An IM document issued to provide specific guidance to address a particular technical question that is associated with an inspection procedure. These guidance documents are found in Part 9900 of the IM. No new technical guidance documents will be issued, and existing technical guidance documents will not be revised unless absolutely necessary.
2. **10 CFR Guidance**. A guidance document on acceptable approaches to particular issues involving rules and regulations in 10 CFR. These guidance documents are found in Part 9900 of the IM. No new 10 CFR guidance documents will be issued, and existing documents will not be revised.

Based on the type of document and current use, every TG or 10 CFR Guidance document will be reviewed and one of the following actions completed: (a) it will be relocated from the IM to another document collection; (b) it will be redefined as another IM document (such as an IMC or IP); or (c) it will be deleted entirely.

- h. **ROP Feedback Forms (FBF)**. See IMC 0801, "Inspection Program Feedback Process," for definitions and use. (section 05.03)
- i. **Comment Resolution Summary**. A summary of comments received from stakeholders and their resolution by the document lead. (exhibit 4)
- j. **Inspection Manual (IM) Change Notice (CN)**. A sequentially numbered and dated transmittal document that lists new, revised, and/or deleted IM documents; the document distributes new and revised IM documents. The "Remarks" section of this document summarizes the reasons for issuing, revising, or deleting a document and details any required special training identified in an IP or TI. The NRR IM coordinator completes the CN. (exhibit 8)
- k. **Document Issuing Form (DIF)**. A signed DIF is required for every IM document created, revised, or deleted. The DIF is prepared and signed by the document lead and communicates information to other signees (such as branch chiefs, IM coordinators, and directors) by answering questions that guide how each document change is processed. (exhibit 2) (section 06.07)

03.02 Support Information for Inspection Manual Documents

See IMC 0040 Appendix A for formatting instructions and standards.

- a. **Table of Contents**. The inspection program has its own standalone table of contents (TOC), but some IMCs include a TOC within the IMC itself.
- b. **Appendix**. A supplement that contains instructional material, either mandatory or discretionary, that is relevant to a document but is too detailed or extensive to be included directly in the body of the document. An appendix can either be included at the back of the IMC/IP or it can be its own standalone document. (section 08.06) (exhibit 6.2)
- c. **Attachment**. Material that is relevant to a document but is too detailed or extensive to be practically included directly in the body of the document. Attachments can be either

placed in the back of the IMC or IP or can be considered as standalone documents. Attachments are generally in the form of a numbered table, exhibit, or figure, etc. (section 08.07) (exhibit 6.3)

- d. Exhibit. An example or feature of document requirements which may include accompanying instructions. (section 08.10)
- e. Figure. Graphical material. Generally found within an IMC, IP, or TI. Each figure should be labeled chronologically. (section 08.09)
- f. Table. Information presented compactly in columns and rows. (section 08.08)
- g. Outline. A summary of a written work or condensed treatment on a subject.
- h. Report. A formal record of the proceedings of a meeting or session.

#### 0040-04 RESPONSIBILITIES AND AUTHORITIES

##### 04.01 Program Office

Each office with an inspection program (NMSS, NRR and NSIR) will appoint its own Inspection Manual coordinator (IM coordinator).

##### 04.02 Originating Organization. Following are responsibilities of the originating organization:

- a. Ensure inspection guidance and governing documents remain relevant to the inspection program.
- b. Develop and revise IM documents to comply with NRC policies.
- c. Perform tasks consistent with IM or internal office guidance, such as preparing memoranda to obtain comments from other organizations and stakeholders on proposed IM document creation or revision. Ensure that all IM documents conform to the appropriate guidance and basis documents for each program office.

In addition: Offices other than NRR may have separate office instructions which supplement the processes described in this manual. Each office IM coordinator can address their specific inspection program requirements.

- d. Elicit appropriate stakeholder feedback from the regions and the NRC offices affected by drafts of new or substantially revised IM documents. The comments received are then dispositioned in a comment resolution summary, which is included in the Document Issuing Package as non-public. (See sections 06.04 and 06.05.) Any accepted comments are incorporated into the revised or new document.
- e. Identify training needs associated with performing new or revised procedures required in an IP, TI, or an OpESS as described in section 06.01 of this IMC.
- f. Obtain the necessary approval for any increase in the Full Time Equivalent (FTE) inspection effort specified in a program document; (this would also include coordination in the initial stages of a TI. See section 08.04.)

- g. Inform NRC technical staff of a pending procedure change and ensure that required training is provided before the procedure is issued or before the procedure effective date.
- h. Prepare and route final drafts of newly created or modified IM documents to the originating organization's IM coordinator when ready for issuance, in accordance with applicable internal office guidance or instructions within this manual.
- i. Ensure that a TI is managed by the steps outlined in section 08.04 of this IMC.
- j. Conduct a periodic review of each of its IM documents to determine whether a document should be revised, deleted, or designated as a reference document. The originating office is responsible for maintaining and updating inspection documents based on its inspection program requirements. See section 0040-07 for instruction regarding on-going maintenance by document leads.
- k. Inform NRC staff in the affected division about evaluation, revision, or deletion of an IM document. Solicit feedback to determine whether disposition is appropriate.
- l. In cases where the IM document impacts another office of the NRC through shared use of resources or scheduling, complete the following:
  - communicate the parameters and scope of the proposed IM document early in the process;
  - include the other office in the comment seeking and resolution process;
  - and add an additional signature line on the DIF for the other office's management (branch chief or higher).

04.03 Director and/or Deputy Director, Division of Reactor Oversight, NRR/DRO

Coordinates inspection policies, programs, and guidance for nuclear reactors.

Reviews and approves the content of new NMSS and NSIR documents, as well as those NRR documents with major revisions as they relate to the ROP inspection program. Specific guidance is found in section 06.04.d.8 of this IMC.

04.04 cROP/ROP Inspection Programs Division or Deputy Division Director: NRR/VPO, NRR/DRO, NSIR/DPR, and NSIR/DSO

- a. Reviews regional best practices and initiatives for possible incorporation into the construction reactor inspection program/reactor inspection program.
- b. Ensures that all new and major revisions (as defined in section 06.04.d.8 of this IMC) to IM documents conform to applicable program basis documentation.
- c. Reviews and approves the content of new or major revisions (such as policy changes) to IM documents. (division directors or deputy division directors from NSIR must approve each DIF before sending the document to NRR for distribution unless otherwise noted.)
- d. Confirms that new IM documents and major revisions to existing documents meet the requirements of IMC 0040 prior to signing the DIF (exhibit 2).



e. Director Vogtle Project Office (VPO)

The VPO director is responsible for authorizing all major changes associated with the construction IM documents related to the cROP.

The VPO director will forward IM documents through the NRR IM coordinator to DRO for final approval by the DRO/IRIB branch chief before issuance. This will ensure that changes made to Part 52 inspection documents do not conflict with the ROP.

04.05 Non-ROP Inspection Programs Division or Deputy Division Directors: NMSS/NSIR

Approves the content of documents necessary to carry out assigned program functions and signs the DIF prior to sending the document to NRR for distribution.

- a. Confirms that documents meet the requirements of IMC 0040 prior to signing the document issuing form (exhibit 2).
- b. Approves and signs requests for regional comments on IM documents in accordance with applicable office guidance.

04.06 NRR Branch Chiefs

Branch chiefs responsible for NRR-owned IM documents will sign the NRR Document Issuing Form (DIF) to approve issuing, revising, updating, or deleting documents that fall under the cognizance of their organization. Branch chiefs must also approve documents that will be redesignated "Reference Only." Branch chiefs will ensure comment resolution results are communicated and that there is awareness of final comment dispositioning prior to submitting to the IM coordinator for issuance.

a. Branch Chiefs, DRO

Branch chiefs in DRO are responsible for authorizing comment memos and for providing branch-level approval of final documents to be issued for documents owned by their branch.

b. Chief, Reactor Inspection Branch (DRO/IRIB) or Reactor Assessment Branch (DRO/IRAB)

The IRAB or IRIB Chief is responsible for authorizing all Part 50 reactor Document for Comment memos for documents owned by all organizations within NRR and for reviewing all final NRR-owned IM documents. The exception would be documents sent for regional comments that are owned by other branches in DRO; those will be approved by the owning DRO branch chief prior to submittal to the NRR IM coordinator.

The IRAB and IRIB branch chiefs are also responsible for identifying the organization or individual who is responsible for any NRR document that does not have a clear or current document lead.

- 1. Assigns (and re-assigns) document leads in their respective branches as necessary. Reviews and approves content for all IM documents that relate to the ROP unless otherwise stated in this IMC. Provides final approval to issue minor document revisions and deletions. In addition to the designated NSIR branch chief review and approval identified in section 04.07, the NRR/DRO/IRIB branch chief reviews and

approves content for IM documents that relate to the security cornerstone and emergency preparedness cornerstone of the ROP. The IRIB/IRAB branch chief will notify DRO management of IMC and IP revisions on a periodic basis.

2. Reviews cROP and non-ROP documents to ensure program alignment with no adverse impact on the ROP.
3. Approves and signs requests for regional and office comments for ROP program documents. May approve deviations from IMC 0040 structural or IMC 0040 Appendix A formatting requirements. Confirms the approval with the NRR IM coordinator prior to issuance for regional and office comments.
4. Confirms branch staff has performed a periodic review of each ROP document selected for revision, deletion, or transfer of the document based on the review criteria described in section 04.02.j. above. Assists in notifying stakeholders of the intent to revise, delete, or transfer these documents from the active IM as necessary. Most notification will be accomplished via the normal comment period described in IMC 0040.
5. Ensures consistent use of mandatory versus discretionary language is used in all ROP inspection procedures.

04.07 Chief, Regulatory Policy and Oversight Branch, NSIR/DPR/POB/ Chief, Security Oversight Support Branch, NSIR/DSO/SOSB

- a. Reviews and approves IM documents that relate to the security cornerstone (SOSB) and emergency preparedness (POB) areas of the cROP/ROP.
- b. Approves and signs requests for regional comments on IM documents that relate to the security cornerstone and emergency preparedness areas of the cROP/ROP in accordance with applicable office guidance.
- c. Ensures that the appropriate page and portion markings have been included in any non-public – Security-Related documents prior to sending the IMC, IP, or TI for issuance. See section 05.02.d in this document for specific references and requirements.
- d. Submits documents for comment and issuance through the NSIR IM coordinator to complete the checks outlined in section 04.10 below.

04.08 Chief, Licensing and ITAAC Branch, NRR/VPO.

- a. Reviews and approves IM documents that relate to the cROP. Provides final approval to issue minor (editorial) document revisions and deletions.
- b. Approves and signs requests for regional comments on IM documents that relate to the cROP in accordance with applicable office guidance.
- c. Chief, VPO

The VPO Chief is responsible for authorizing all Part 52 reactor comment memos for documents owned by VPO, and for reviewing all final, Part 52, NRR-owned IM documents.

The VPO Chief is also responsible for identifying the organization or individual that is responsible for any Part 52 NRR documents that do not have a clear or current document lead.

The VPO Chief will forward IM documents to DRO (thru the NRR IM coordinator) for final approval by the DRO/IRIB branch chief before issuance. This will ensure that changes made to Part 52 inspection documents do not conflict with the ROP.

#### 04.09 Inspection Program Document Leads:

In addition to the following responsibilities, document leads also follow the continuous oversight detailed in section 0040-07 of this manual.

- a. Responsible for the technical integrity and continued relevance of the document to the inspection program. Update requirements and guidance as needed in accordance to program changes (all leads) and data trends as detailed in IMC 0307 Appendix B (Baseline ROP only). Develop and propose actions to address any issues of concern.
- b. In consultation with the approving authority, ensure IM documents and any corresponding bases are maintained, developed, and revised in support of inspection program implementation. Supporting program implementation includes, but is not limited to, appropriately revising or developing documents to address regulatory changes, operating experience, and stakeholder feedback.
- c. Review and determine the viability of feedback and the best approach to address and disposition IM document feedback per IMC 0801.
- d. Appropriately communicate proposed document changes and develop suitable training in support of the document issuance and subsequent implementation.
- e. Upon request, provide appropriate and timely assistance to internal stakeholders on implementation of IM procedures. When procedural interpretation or extensive clarification is required, ensure NRC management is aligned with the feedback being given to internal stakeholders and consider whether a revision to the document is warranted.

#### Further clarification of lead responsibilities follows:

1. Perform tasks consistent with internal office guidance, ensuring that all IM documents conform to the appropriate guidance and basis documents (as appropriate) for each program office. Inspection Manual document changes are coordinated with the IM coordinator assigned to your program office (NMSS, NRR, or NSIR). The document lead may request approval from DRO IRIB or IRAB branch chiefs to deviate from IMC 0040 and/or Appendix A formatting requirements based on agency need. The deviation will be notated in the revision history table.
2. Elicit appropriate stakeholder feedback via the Document for Comment process. Comments should be elicited from the regions and the NRC offices affected by drafts of new or substantially revised IM documents; inform the IM coordinator when additional stakeholders should be added to the Doc for Comment solicitation. Comments are recorded in a comment resolution summary or a comment-specific version of the document; either or both of these non-public documents are part of the

Document for Comment Package. At the conclusion of the comment period, the document lead will resolve and incorporate the appropriate comments into the revised IM document, using the same accession number that was used for the regional comment period. The document lead will then follow section 0040-06 to provide a document issuing package to the NRR IM coordinator. (sections 06.04 and 06.05).

For IMC or IP revisions to be in effect for the next calendar year, submit your drafts for comment no later than the third quarter. Documents warranting Commission interaction may also need greater interaction with external stakeholders and greater time allowance in the project schedule for finalizing the documents for issuance.

3. When technical or resource requirements change, inform the NRR IM coordinator via the DIF to ensure that any sample or resource (hours) changes are captured in IM documents and are reflected in Reactor Program System (RPS)-Inspections before the start of the next inspection cycle. Avoid increasing or decreasing sample sizes in the middle of a cycle. For baseline IPs, the document lead will work with the NRR IM coordinator to update RPS-Inspections with changes in sample sizes, estimated resource hours, and sample scope text. Sample scope text can be reviewed using RPS-Inspection Report IP 29; notify the NRR IM coordinator about specific changes.

It is the document lead's responsibility to inform their branch chief when new cost activity codes (CACs) are needed; this could occur when an IP is cited to a new IMC. New CACs may be requested prior to the formal issuance of the IP in order to ensure the CAC is available in a timely manner for individuals scheduling inspections.

4. Ensure that any increase in the FTE inspection effort specified in an IM document is formally approved by the cognizant program office before the document is issued or before it becomes effective. See IMC 2515 section 07 regarding changes in resources.
5. Inform NRC technical staff of a pending IM document change and ensure that required training is identified and implemented prior to issuance. If the regions are affected by changes made to IM documents (section 06.04c.), the inspection program document lead will forward the draft document to the cognizant IM coordinator to prepare the document for comment package.

When it becomes necessary for draft inspection documents to be discussed at public meetings, forwards the draft inspection program document to the cognizant IM coordinator to make the draft document public for the sole purpose of discussion at a specified public meeting. The IM coordinator will add the appropriate language in the revision history table for this draft public document.

6. Prepare and route final drafts of newly created or modified IM documents to the appropriate IM coordinator when ready for issuance, in accordance with applicable internal office guidance. The IM document should be formatted according to IMC 0040 Appendix A prior to submission to the IM coordinator.

Note: ALL end-of-year IM changes need to be completed (DIF signed, formatting correct) and sent to the NRR IM coordinator and IRIB and/or IRAB branch chiefs for processing by November 15<sup>th</sup> of each year. Rare exceptions may be granted on a

case-by-case basis. Plan accordingly if the document has a specific effective date because formatting issues often delay acceptance of documents for processing.

7. Closely coordinate with the cognizant IM coordinator to ensure that document issuing packages are processed in accordance with section 06.07 requirements and applicable office guidance. In addition, provide “Owner” rights in ADAMS to Document Processing Center, the NRR IM coordinator, (the IM coordinators in NMSS, and NSIR where applicable), and Records Managers. “Viewer” rights are provided in ADAMS to NRC Users.

#### 04.10 Inspection Manual Coordinators: NMSS and NSIR

- a. Ensure that the appropriate inspection program organizations, NRC regional offices, and other affected NRC offices have the opportunity to comment on documents affecting their programs.
- b. Verify that the requirements of IMC 0040 and IMC 0040 Appendix A are met in the preparation and approval of IM documents (section 06.09). Ensure that the timeliness goal for end-of-year IM changes is met (section 04.09.e.6).
- c. Ensure that NMSS and NSIR policies and procedures are followed as outlined in the respective office’s guidance documents.
- d. Track the progress of draft IM documents submitted for issuance and make the status of submitted documents available to those who submitted them, from the date of submission to the date of issuance.
- e. Accept final drafts of newly created or modified documents prepared by the originating office for submission to the NRR IM coordinator for final processing and issuance. Ensure the NRR IM coordinator has “Owner” rights in ADAMS for all inspection documentation (the IMC, IP or TI to be issued), the Comment Resolution summary, and the DIF.
- f. In cases where a program office seeks and receives subject matter expertise from another program office on an IM document, the program office technical lead providing the expertise will route the IMC, IP, or TI through the technical lead’s office IM coordinator to review and ensure applicable inspection program requirements have been met. The technical lead’s office IM coordinator will sign the DIF and return it to the originating office requesting subject matter expertise, who will then forward to NRR for issuance.

#### 04.11 VPOB Licensing Assistant (LA)

The VPO LA follows the procedures in IMC 0040 and IMC 0040 Appendix A to review and process documents for regional comment memos and prepare construction inspection documents for issuance through the NRR IM coordinator. (section 06.09)

The VPO LA is responsible for maintaining the “Request for Comment” memo Outlook distribution list, and sending the memo, draft documents, and comment resolution table to the applicable staff for review.

Once draft documents are ready to be issued, the VPO LA will prepare the Part 52 inspection document ADAMS package (include the NRR IM coordinator as Owner in ADAMS) and send it to the NRR IM coordinator. The Part 52 inspection document package will include the applicable signed DIF, the IM document itself, the comment resolution, and any feedback forms that will be closed with the issuance of the Part 52 inspection document. (section 06.07)

#### 04.12 Inspection Manual Coordinator: NRR

- a. With the addition of specific office guidance for NRR, performs the same tasks for NRR as the IM coordinators in NMSS and NSIR.
- b. Reviews NRR IM documents for structural conformity, formatting issues, and program applicability prior to sending the documents for regional comment. May make minor editorial changes to the document at this time or may give the document back to the originator to make the revisions. (section 06.09)
- c. Prepares memoranda to obtain comments on proposed new and revised NRR IM documents from other organizations and stakeholders (exhibit 3). Addresses the comment memo to all regions and applicable program offices; obtains signature of the IRIB/IRAB branch chief. If the document is owned by another branch within the Division of Reactor Oversight (DRO), the appropriate branch chief signs the Document for Comment memo (exhibit 3).

The IM coordinator maintains email distribution lists for both the Document for Comment and Document Issuance processes. The "Document for Comment memo will be addressed to all regions: Division Director and Deputy of the Division of Reactor Programs (DRP), the Division of Radiological Safety and Security (DRSS), the Division of Reactor Safety (DRS), the Division of Operating Reactor Safety (DORS), and the Division of Construction Oversight (DCO). Distribution will also include staff identified by the regions, the Technical Training Center, NMSS, NSIR, and the Office of Enforcement. The document lead may identify additional staff required to receive the Document for Comment memo and ADAMS package information.

- d. Creates the comment resolution summary which may be in table format or as a comment version of the document which allows collaborative comments. Makes the draft version of the document public for working groups when required.
- e. Tracks the progress of draft IM documents to final version and makes the status of submitted documents available to the IM coordinators who submitted them, from the date of submission to the date of issuance.
- f. Accepts final drafts of newly created or modified IM documents from IM coordinators of other offices for issuance in the IM. No documents will be accepted from any individual other than an IM coordinator identified in advance by the originating office's management.
- g. Returns final drafts of IM documents to the IM coordinators of originating offices other than NRR when further changes/revisions are required.
- h. Ensures that all format and other program requirements, such as program applicability, have been met for final drafts of IM documents. If a large number of format and program



requirements are not met, returns document to originator or administrative staff for corrections. May make minor format and program applicability changes as needed prior to sending the document out for final issuance. (For IM documents originating from offices other than NRR, verifies the approval of the office and cognizant division management, as appropriate, is documented on the DIF.)

- i. Enters an "Effective Date" on the title page (when applicable) for ROP IM. **The effective date is typically later than the issue date to allow sufficient time for ROP implementation; however, the date may be earlier with approval by the final approving authority.** May enter an effective date on IM documents that are outside of the ROP when requested. Updates the Revision History Table to include the issue date, the CN number, and any **FBF** accession numbers. Confirms format and program requirements have been met and issues the new or revised document in 7 to 10 business days **from receipt of the properly formatted document**, unless otherwise directed by the branch chief, or directors.
- j. Creates the ADAMS Change Notice package, which includes **the following documents**:
  - a standalone change notice document that summarizes document creation, revision, or deletion;
  - a **revised**, standalone TOC;
  - the new or revised document(s);
  - the comment resolution summary document(s) (when applicable);
  - the DIF(s); and
  - any **FBFs** that have been closed due to the changes made in the revised document.

Assures availability of IM documents through the NRC's ADAMS platform, the NRC **public website (for public documents)**, and **the internal SharePoint site (for non-public, security documents)**.

- k. **When necessary**, updates the RPS-Inspections **module** to add CN information and **revises** the baseline IP table with new sample sizes and requirements prior to the year they will be implemented. Updates all other IM information in RPS-Inspections as required. **Coordinates with the IMC 0611 lead to make changes to the RPS inspection report Auto Report Generation module as needed.**
- l. **Once declared** official records in ADAMS, publishes IM documents (either new or revised) on the public website **or** internal NRR **SharePoint site** (for security documents) based on the information provided on the DIF. **Sends an email to announce details of the CN issuance to the CN Distribution list and to staff members listed on the DIFs.**
- m. **Processes closed FBFs in accordance with IMC 0801 and updates the FBF SharePoint site.**
- n. **Maintains various databases for IM documents including the following**:
  1. **list of leads for each document with last/next issue date**
  2. **comprehensive history of all document changes (CN, Document for Comment, and FBFs)**
  3. **list of Documents for Comment**
  4. **list of FBFs (both open and closed) – accessible to document leads**
  5. **CN History – ordered by CN number listing each document issued, deleted, revised, reactivated, or updated.**

Each inspection program should contain basis documents. **The document types for this inspection manual (IM) are listed in section 03.01.**

In general, revisions to IMCs and IPs should not occur more than once every 6 months unless circumstances dictate the change. See section 05.03 for further details regarding what would prompt a revision to an IMC, IP, TI, or OpESS. Consider the impact that changes in a particular IM document (e.g., IMC, IP, TI, or OpESS) will have on other IM documents. Contact the originating office of the affected IM document(s) and coordinate further changes that are essential to maintaining consistency within the IM.

In the ROP inspection program, documents must conform to IMC 0308. If changes or revisions alter the scope or basis of an IM document, appropriate updates to the ROP Basis Document are required. Once the need for a basis change is recognized, **provide that information** to the IMC 0308 owner **when significant changes warrant such as Category 3 or higher changes (see section 06.04d.8(c)) or if the IMC 0308 owner determines the change is necessary.** In addition, **consider the document hierarchy; for the ROP, notify the IP 71111 and IMC 2515 Appendix A owners if a document revision affects those documents.**

In the ROP inspection program, each IMC and IP will be reviewed at least once every 5 years, in accordance with the **instructions in section 07.01.** Upon completing the review, the IMC or IP will be updated as necessary, and reissued noting that a periodic review has been completed. **The 5-year review may be completed at a shorter interval as long as all of the requirements of the review are met.**

During the course of a periodic review, it may be determined that some ROP-related documents can be designated as reference IMCs, or IPs (**section 07.01a**). Reference IMCs or IPs will be reviewed on an as-needed basis before use and reissued noting any updates or that a review was completed and a major revision to the document was not warranted. The list of reference IMCs and IPs is maintained on the public web pages **and in the IM Table of Contents**, where applicable, and follows the issuing process, as described in this IMC.

**As part of this review process, the document lead shall also review any open FBFs (per IMC 0801) and any open ROP lessons-learned tracker items (per IMC 0307) related to the ROP inspection document to ensure that they will either be satisfactorily addressed in the upcoming document revision, or that they are actively being moved towards resolution. By reviewing FBFs and ROP lessons-learned tracker items as part of the 5-year periodic review, efficiencies are gained in not having to re-issue inspection documents unnecessarily.**

#### 05.01 Plain Writing Guidance.

Plain language is communication your audience can understand the first time they read or hear it. Strive to communicate clearly and comprehensively. State clearly what the NRC technical staff is to do. Use specific and objective words. State who, what, when, where, and why. State conditions, limitations, and exceptions separately.

- a. Use short words, short sentences, and short paragraphs. If possible, avoid words that are not in common use outside of the NRC unless they are defined or explained. (Most of the IM documents are publicly available). Divide long, drawn-out sentences into two or more sentences. Try to limit paragraphs to 10 lines or less. Reorganize material to break lengthy, complex paragraphs into several paragraphs or a list.



- b. Read and edit draft material from the user’s perspective. Replace wordy prepositions (“in the vicinity of”) with one-word prepositions (“near”).
- c. For further guidance, refer to NUREG-1379, “NRC Editorial Style Guide,” [the Chicago Manual of Style Online](#), the Government Printing Office Style Manual (latest edition), and [the Plain Language Action Plan \(non-public\)](#). These references can be found on the internal website. Also refer to Webster’s dictionary (latest edition).
- d. Terminology must be consistent. Do not use two or more words for the same idea, concept, or activity. Except for abbreviations in common use, show the complete word, title, or phrase the first time it is used with the **acronym** in parenthesis immediately after. An example is service water system operational performance inspection (SWSOPI).
- e. The originator must make clear what is mandatory of NRC technical staff in the requirements sections of **ROP program** IMCs, IPs, and TIs, and what is discretionary in the guidance sections of the same documents. **Ensure the words “requirements” and “guidance” correspond appropriately with the qualifiers below to differentiate mandatory and discretionary activities (Reference OIG-16-A-12, “Audit of NRC’s Reactor Oversight Process: Reactor Safety Baseline Inspection Procedures” (ML16097A515)).**
  - 1. **Requirements – Utilizes words such as “must,” “shall,” and “will” and prohibitive phrases such as “must not,” “shall not,” and “will not.”**  
Mandatory **activities/conditions that have an obligation to be met.**
  - 2. **Guidance – Utilizes words such as “can,” “may,” “might,” and “should.” and prohibitive phrases such as “cannot,” “may not,” “might not,” and “should not.”**  
Discretionary or optional activities that provide inspectors information to consider or guide inspections. These terms indicate that the inspector decides whether to implement the guidance based upon site conditions. Guidance should be clearly identified so it will not be mistaken for additional inspection requirements.  
  
**Use of action verbs such as “verify,” “determine,” etc., in guidance sections does not constitute requirements that must be done. Use of such action verbs in guidance sections constitutes optional activities that provide inspectors information to consider or guide inspections.”**
- f. Since Web links (also known as hyperlinks) can change, the insertion of a Web link in a document is not preferred and should normally only be used to provide supplemental, non-critical information. The insertion of a Web link in a public document must point to another public document or public web page, unless otherwise stated as an internal Web link. Only use Web links to NRC documents with accession numbers.
- g. For all new documents and those that contain extensive revisions, the originator will follow the agency procedures to receive technical editing assistance.

#### 05.02 Inspection Manual Document Requirements.

All drafts and final documents must be prepared in Microsoft Word (MS Word), consistent with the format described in [IMC 0040 Attachment A. Completed and issued documents are stored in ADAMS as official agency records.](#)

- a. The last page(s) of an IM document will list the revision history. If a revised document does not include a revision history table, **the document Lead will create one** using the **instructions** in **section 06.06**.
- b. The IM document must be placed in ADAMS. The originator must ensure version control when revising and creating IM documents by using the ADAMS check-out and check-in procedures and other version control techniques for exclusive use of official copies from ADAMS.
- c. All new or substantially revised IM documents should be reviewed by an agency technical editor.
- d. Portion markings will be included in any non-public Official Use Only – Security-Related Information (OUO-SRI) documents prior to sending the IMC, IP, or TI to NRR for issuance, unless otherwise stated by the appropriate NSIR branch chief. Portion marking requirements can be found in the non-public Yellow Announcement (YA) 20-0042. **Specific formatting instructions are provided in IMC 0040 Appendix A; this formatting is typically completed by the NSIR Office.**

**Once the NRC has commenced using Controlled Unclassified Information (CUI) designations, the staff will need to use the most current header and portion markings as described in agency guidance. The program is described in CUI-STD-1000, “Nuclear Regulatory Commission Controlled Unclassified Information Standard” and MD 12.6, “NRC Controlled Unclassified Information (CUI) Program.”**

#### 05.03 Revisions to Documents/Creating new documents.

**Once it has been determined that a new or revised IM document is required, IMC 0040 should be consulted. The document lead must follow the procedures and format delineated in IMC 0040 to prepare a draft version of the document and determine whether the document must be submitted for a formal comment period.**

When new IM documents need to be issued or existing IM documents need to be revised, it is **typically** due to one **or more** of the following five reasons:

1. **Document Feedback**: Inspectors and technical staff generally use the **ROP** inspection FBF process to submit comments and suggest changes to improve the implementation of the inspection program. IMC 0801, **“Inspection Program Feedback Process,”** contains instructions to **initiate, submit, and process FBFs**. It includes the **response times and disposition categories** used by inspection program offices when responding to FBF comments. **The FBF response may include changes to one or more IM documents.**
2. **ROP Baseline Inspection Procedure Reviews**: ROP Baseline Inspection Procedures are **monitored in accordance with** IMC 0307 Appendix B, **“Reactor Oversight Process Self-Assessment Baseline Inspection Program Monitoring and Comprehensive Review.”** This may result in the shifting of resources and inspection sample requirements **or other revisions to the baseline inspection procedures, as needed.**
3. **Periodic Review**: All IM documents will be reviewed for continued applicability and periodic updates; **NRR IM documents will be reviewed every 5 years or sooner; this**

review period is consistent with the revision period for Management Directives (MDs). This review process may result in changes to the documents. (section 07.01)

4. Agency-Initiated Changes: Commission direction or inspection program changes may create the need for changes to IM documents.

This is the most common process for the development of TIs. Agency-initiated changes do not require an official FBF, but a FBF can be used as a tracking mechanism for such changes.

5. Response to External Assessments: Government Accounting Office (GAO) and Office of Inspector General (OIG) audits may initiate changes to the IM. These audits are infrequent and do not require a FBF to track the changes, but the forms can be useful in this capacity.

Based on any of the above reasons, a new IM document may be created and issued, an existing document may be revised and re-issued, or an existing document may be deleted. In all cases, the changes are completed using the change notice process. To make revisions, prepare the document using instructions in section 06.02.

Both new documents and revisions are issued by a CN and noted in the revision history table of the IMC, IP, TI or OpESS, giving careful consideration in a revision to avoid inadvertently deleting generic inspection requirements. In the case of a total rewrite of a document, it is not necessary to mark the changes in red with lines in the margins. For some extensive revisions, it may be beneficial to the reviewer to include a document comparison with red-lined changes. In all cases, changes to the document must be noted in the revision history table as part of the revision (see section 06.06).

#### 05.04 References.

Any information appended to a manual document is listed in the Reference section as shown in exhibit 7. References must be directly relevant to the document and essential to its completion. The reference list will include all other IM documents (IMC, IPs, and TIs) that appear in the document. References may not be used simply to convey historical information. References to another IM document within the body of the document must include the type of document, the number, and the section or appendix (e.g., IMC 2500-05.01; IMC 2500, Appendix I). For NRC documents where the ADAMS accession number (e.g., ML003717333) is included, the number should be listed at the end of the entry. Regulatory guides and industry standards and codes do not need an ADAMS accession number; INPO documents are proprietary and should not be referenced in the manual. References and links to web pages must be public, unless specifically identified as non-public. Specific revision numbers or dates are not necessary in the reference section.

In the body of the document, reference to another section of the same document must include a phrase such as 'in section 04.01 of this IMC.' References to further information in the same document may also be included in parenthesis within or at the end of a sentence or paragraph.

Some inspection procedures append a list of the documents that apply to the procedure. The list usually includes citations from the *Code of Federal Regulations*, industry codes and standards, regulatory guides, etc. No subordination is needed. If documents have

been fully referenced in the text, this section may be omitted. References should apply directly to the performance of the IP. They should not include general background information.

Any commitment being added to a document (such as requirements of a generic letter) will also be listed in the section where it appears and identified with a commitment tracking number as described in section 06.03 of this IMC. Commitments must also be included under the commitment section of the revision history page. **The following may be considered commitments: revising ROP governance documents to address OIG audits or to address Commission staff requirement memorandums.**

Inspection manual documents will not reference documents, policies, or practices of the Institute of Nuclear Power Operations (INPO).

#### 05.05 Incorporating Other Documents.

Documents from the NRC or other agencies may be incorporated by reference into IM documents when necessary to implement the inspection programs. **However, ROP program documents should not be used to establish or clarify regulatory requirements as the process outlined in IMC 0040 differs from processes used to publish documents such as Regulatory Guides, NUREGs, and Generic Communications.**

#### 05.06 Requests for Guidance, New Documents, and Revisions.

- a. **To the greatest extent possible**, requests for clarifications on inspection governance in new **and** existing documents applicable to the IM should be initiated using the feedback process as described in IMC 0801, "Inspection Program Feedback Process." This process tracks the requests **from initial submission** through the evaluation and editing periods.
- b. Requests for clarification on inspection program governance, new documents, and revisions to existing documents other than those applicable to the ROP will be addressed to the Chief, NRR/DRO/IRIB, or NRR/DRO/IRAB, (for reactor inspection and oversight programs) or to the applicable manager in NMSS or NSIR.

### 0040-06 DOCUMENT PREPARATION AND PROCESSING

#### 06.01 Training Considerations.

When planning to revise an existing document or create a new document, assess the need for NRC technical staff to be trained. **The evaluation should** consider whether written guidance already exists, **determine** the complexity of the activity, and **identify** the frequency in which the staff performs the activity. In general, training should be developed for activities that require a new skill, are complex in nature, or require a subject matter expert to answer questions. When training is required, the originating organization is responsible for developing the technical content and determining the most appropriate training method, as well as ensuring that existing training is consistent with planned IMC, IP, TI or OpESS revisions. If existing training is not consistent with an IMC, IP, TI, or OpESS revision, it will have to be revised to address the IMC, IP, TI or OpESS changes. Training methods include updating written guidance, conducting a teleconference or video conference, recording the training, developing computer or

web-based training, adding self-study or on-the-job training standards to existing qualification requirements, or conducting regional presentations. When selecting the training method, consider the time needed for all affected staff to complete the training and that training should be completed prior to issuing the IM document.

When considering training needs for new IMC or IP revisions, it should be coordinated with the NRC's Technical Training Center (TTC). Training should be considered if the inspector needs to be trained prior to performance of the inspection activity. If there is benefit, less formal knowledge transfer sessions (which are not considered training) may be conducted by IMC or IP Leads without TTC coordination.

## 06.02 Document Preparation.

Use the document structure requirements described in this IMC and word processing format requirements detailed in IMC 0040 Appendix A to develop a new document or to revise an existing document; in all cases use the current version of Microsoft (MS) Word.

Use the most current official IM document as the starting point for a revised IM document. Retrieve the current MS Word version of the document from the NRC Public website, from ADAMS, or from SharePoint, and save it as a separate working file. Avoid converting a PDF document to MS Word as this results in many formatting issues. As a last resort for older documents (pre MS Word), ask one of the administrative assistants to do the conversion.

To retrieve the most recent MS Word version, go to one of the following locations:

- a. NRC Public Document Collections/Inspection Manual located in the NRC Library, Document Collections at nrc.gov. Click on the type of document and click the link for the most current Word document (.doc or .docx).
- b. ADAMS – (for revisions issued in 2021 or later)
  1. Search for the current document in ADAMS
  2. Right click the document icon and select “Properties”
  3. Choose the “Versions” tab
  4. Double click the MS Word version added just prior to the PDF document (if available); it should have been added within 1 hour prior to the final PDF version. If there is doubt as to whether this is the most current version, do an automated document comparison with the official PDF version or revert to the NRC Library Document Collection.
- c. NRC internal SharePoint site for security-related documents
  1. Click on Office / NRR
  2. click on the Inspection Manual button to access the ROP Digital City site
  3. under the section “Inspection Manual (Public and Non-Public links)”
  4. click on type of IM document
  5. locate the number of the document and click the link for the most current Word document (.doc or .docx).
- d. Edit the MS Word version of the current document. To prepare the prior version for revision, complete the following:

- remove the existing vertical lines in the margins showing revised text and the red font of changed text by clicking on the Review tab and then "accept all changes" in the document.
  - Save the document.
  - Then set up the Track Changes options in MS Word to display insertions in red, deletions shown with a strikethrough, and Changed Lines in the Outside Border to always show balloons. **Specific instructions for this process are located in IMC 0040 Appendix A.** This will set up the formatting for the (on average) 30-day regional comment period.
  - When the document is ready to be issued, all the deletions and formatting balloons will be accepted by the document lead, and only the red-line additions with the track change bars in the left margin will remain to quickly point to where the changes have been made in the document.
- e. **Once the document is ready for issuance, IMC / IP leads should ensure that the IMC / IP is in the proper format for final issuance (i.e., no visible formatting balloons, no visible strikethroughs, and only the red line additions with the track change bars in the left margin should be visible). IMC / IP leads should ensure that the revision history table is updated as well.**

#### 06.03 Incorporating Specific Requirements.

- a. There are instances when specific inspection requirements are placed in an IP to verify licensees continue to satisfy a specific commitment (e.g., identified in their response to a generic communication, such as a bulletin) or when policy changes are implemented (e.g., Commission direction or in response to an OIG audit).

When adding these specific requirements to an IM document, the requirement will be identified as follows:

1. The text that defines specific requirements, **as outlined in section 05.04 of this manual**) will be italicized. This is a specific exception to the requirement not to use italic text type in a program document for emphasis (See IMC 0040 Appendix A).
  2. A commitment tracking number will be assigned using the next sequential number available for that procedure. This number will be bracketed and entered following the italicized text (e.g., [CX]). The commitment tracking number will be added to the revision history page by the document lead.
- b. To delete a specific requirement that is no longer valid, approval **from** the respective division director is required.

For IMC 0040, the following commitment applies:

*To ensure that specific inspection requirements are not inadvertently deleted through a revision to a procedure, a review of the revision history section shall be performed. If the revision history does not cover a minimum of 4 years, then a review of all the change notices from the past 4 years for that document shall be performed and the*



*results documented in the revision history page. Change Notices are located on the external NRC Web Page. [C1]*

#### 06.04 Regional and Office Comments.

Drafts of new or revised IM documents must be sent for review and comment to **program and regional** offices that **may** be affected by the changes. **Route document changes that affect more than one office through the respective IM coordinators (e.g., NMSS or NSIR); this ensures that** affected divisions and regions have had the opportunity to comment on the **changes**. Inspection Manual coordinators in NMSS and NSIR will follow their appropriate internal office guidance, as well as issue a 30-day document for comment package to affected program offices and regions. This document for comment package will include ADAMS accession numbers for the package; the memo or email used to send the package; the IMC, IP, TI, or OpESS; and the comment resolution summary. Each office's IM coordinator will ensure comments from regional offices and other internal stakeholders of the document have been obtained according to the applicable office guidance. It is the responsibility of the originating office to obtain comments, perform comment resolution (which may include incorporating some comments into the revised document), and create a comment resolution summary for each document.

- a. The purpose of the non-public review and comment period is to resolve issues specific to the proposed **document** change. Comments outside the scope of the proposed change are not appropriate for this process and should be submitted using the processes described in section 05.06 of this IMC. However, depending on the nature of the comments received, it **may** be appropriate to include comments outside the scope of the proposed change. These non-editorial changes should be shared with the regions and the NRC offices affected—if they meet the review criteria—and may warrant an additional opportunity for comment. **The determination on whether the scope should include other offices is initially made by the document lead and should be communicated to the IM coordinator.**

The review and comment period is, on average, 30 days. Based on inspection program needs, the comment period can be either reduced or expanded. If additional time is needed for the review of NRR documents, the applicable **regional TSAB/TSAT or** inspection program branch chief must send a request for an extension to the **document lead, NRR IM coordinator, and IRAB or IRIB branch chief** via e-mail. If a regional or program office does not have any comments, an e-mail must be sent to the NRR IM coordinator and document lead. **At minimum, a response to the request for comment should be provided by each regional office, VPO, NSIR, OE, and NMSS.**

On the rare occasion that an industry working group has been created to gain industry consensus on inspection documents, the agency may make the draft document public and available to industry by following the requirements in 5 CFR 1320, "Controlling Paperwork Burdens on the Public." This will be done at the discretion of the document lead and their branch chief, and only under rare circumstances. To ensure consistency in the ROP, the NRR IM coordinator will make the draft version of the NRR document public.

- b. Comments from the inspection program staff are **particularly sought** because they **use the IM documents** to implement the inspection programs. However, requests for their comments must be controlled so they do not become burdensome on their workload.

Minor, non-substantive changes do not need to be sent to the regions for comment. In those cases, the comment resolution column of the revision history table is marked N/A (section 06.06).

c. Inspection program offices determine if a document must be sent to the regions by answering the following questions:

1. Will the proposed document affect regional resources?
2. Will the document affect regional programs?
3. Would a regional perspective be beneficial to a proposed change?
4. Does the document represent a policy change?
5. Could any of the proposed changes to an existing procedure potentially change the document's context or impact the inspection program?

If the answer to any of these questions is "yes," then a draft of the document will be sent to all regions and other affected offices for comments. The exception would be a rapid substantive correction made to an IMC or IP which would not require regional comment. The NRR/DRO/IRIB or NRR/DRO/IRAB branch chief and, on occasion depending on the nature of the correction, NRR/DRO division director or deputy division director would make the final decision regarding whether or not to include the regions for comment.

d. The rules for sending draft documents to program office staff and the regions for comments are:

1. Consider regional workload, given the scheduling of end-of-cycle meetings and mid-year inspection plans that are sent to the licensee, semi-annual division director counterpart meetings, semi-annual inspector counterpart meetings, and end of fiscal year activities (e.g., staff performance appraisals and budget cycle activities) to ensure availability of staff and management for review.
2. If more than six IMC and IP documents are anticipated to be issued to the regional offices for comment simultaneously, then efforts must be made to **prioritize and space those requests with time intervals; the IM coordinator will inform the IRIB branch chief and document lead(s) when approaching the six-document limit.**
3. Send only final drafts. **However, crossed-out changes may be retained in the draft at the discretion of the document lead.**
4. Identify a document lead in the originating office who the regions can contact to discuss the document.
5. Prepare the request far enough in advance of the document's **proposed effective date** to allow for review of not less than 30 calendar days, unless otherwise specified. **The comment period should be scheduled to complete 45 days prior to the proposed issue date unless prior approval is received by the IRIB/IRAB branch chief.**
6. Each program office will identify persons in each region and other stakeholders in organizations within the NRC to review the draft documents out for comment.



7. For requests for regional comments on new or revised IM documents that involve major policy changes, send a copy to the Office of the Deputy Executive Director for Reactor Programs in the Office of the Executive Director for Operations (OEDO) and the Office of the Inspector General (OIG).
8. When submitting a new or revised document to their respective IM coordinator for comment, the document lead will provide the following:
  - (a) The most recent revised document (preferably as a link to ADAMS)
  - (b) Provide owner access in ADAMS to the appropriate IM coordinator, as well as the NRR IM coordinator.
  - (c) Identify the significance of the change to the IM document based on the categories below:
    - (1) Category 1 / Commission Approval: See section II.I.1 of MD 8.13, "Reactor Oversight Process."
    - (2) Category 2 / Commission Notification: See section II.I.2 of MD 8.13, "Reactor Oversight Process."
    - (3) Category 3 / Division Director: Examples include, but are not limited to, changes to objective scope or requirements, changes in resource allocation for inspections, new non-baseline IM documents, or significant rewrites that may not fall under category 2.
    - (4) Category 4 / Routine: Most changes will fall under this category. These are routine changes to documents that are not editorial. Examples include, but are not limited to, clarification of existing guidance and inspection requirements. The branch chief may request elevation to a higher category of significance.
    - (5) Category 5 / Minor: These documents include minor editorial changes or corrections. These changes do not typically go out for comment. Copies of the changes may be sent out for awareness.
  - (d) Names of any other individuals or offices that should be included in the document for comment email notification
  - (e) Provide the proposed effective date
  - (f) A brief reason for why the document is being revised, issued, or deleted if it is not apparent in the document history table
  - (g) Include any FBFs that have been addressed with this proposed revision
  - (h) For ROP program documents, when requirements are changed, describe whether the resource estimate is increased, decreased, or remains the same and explain the basis for any changes

For ROP documents owned by NRR, each region, headquarters branch, and program office will disseminate the draft document as appropriate, collect comments from their

staff, and send one collective **communication regarding** comments to the NRR IM coordinator and the document lead.

#### 06.05 Comment Resolution.

A Comment Resolution summary accession number will be included with the 30-day comment memo sent to stakeholders at the time the IMC, IP, TI or OpESS is sent **out** for comments. The appropriate IM coordinator and the NRR IM coordinator will be given “Owner” rights in ADAMS, and the inspection staff will be given “**edit**” **permissions** to add their comments to the summary **located in SharePoint**. This **allows** inspection staff to review comments provided to NRR by other stakeholders prior to final issuance of a document if the comments are received during the comment period and **saved in the comment version of the document in SharePoint**. **SharePoint also allows the document owner to resolve comments in real time.**

The IM coordinator is responsible for coordinating responses from the regions and headquarters offices. **After the comment period has ended, the IM coordinator will incorporate any emailed commenter responses into the document prior to sending to the originator for completion and will ensure that the originator was copied on the emails.**

The originator will ensure the final version of the comment resolution summary includes a copy of all substantive written comments received with their disposition; **the originator will list the accession number in the appropriate column of the revision history table on the final page of the IM document.** (See **exhibit 4** for examples of comment resolution tables—used as a standalone document or incorporated into a comment version of the document.)

**At the conclusion of the comment period, the document lead will resolve and incorporate comments received, then follow the procedures in this manual chapter to provide a document issuing package to the NRR IM coordinator. All IM documents owned by organizations within NRR (other than those owned by DRO branches) will be submitted to their respective branch chief prior to being forwarded to the IM coordinator.**

Comments received by stakeholders but not incorporated in the final version will be discussed with the commenter prior to issuance. **If further discussion is needed for an unresolved comment, it should include the IRIB/IRAB branch chief. The final approving authority for the revised document will decide the outcome.**

NMSS and NSIR **IM coordinators** should submit their **final** document issuing package to the NRR IM coordinator and include the comment resolution summary to be declared as an official, non-public record in ADAMS. **The NRR IM coordinator will add the document issue date to the comment summary upon final processing.**

#### 06.06 Update or Create Revision History Table.

Maintaining a revision history table will ensure that requirements are not inadvertently deleted. If a revision history table does not already exist **at the end of the document**, it will be created by the originator using **exhibit 5** as an example; **specific formatting for the table is provided in IMC 0040 Appendix A.**

The revision history table will not use track changes **for the current revision and will include the following items:**

1. Column 1 – Commitment Tracking Number (if applicable).
2. Column 2 – Include the ADAMS accession number of the document, issue date and CN number associated with the document creation or revision. The CN number and issue date for the current revision are determined and added by the NRR IM coordinator.
3. Column 3 – The Description of Change includes an initial issuance statement or a brief description of the scope of the revision. Include any commitment tracking identification numbers specific to the document.
4. Column 4 – Briefly describe any training requirements which result from the revision that must occur prior to document issuance; include the date the training was completed.
5. Column 5 – List the ADAMS accession number for the comment resolution summary and any feedback forms closed with this issuance; also include the FBF number.

The first time the document is issued, the “Description of Change” column will include a statement that a 4-year historical search<sup>1</sup> for commitments was conducted and whether or not commitments were found. Every revision after that will include a summary of the changes being made and reference any specific documents that support the changes (such as feedback forms, memos, audits, Management Directives, and Yellow Announcements). Ideally, the revision history table should contain the history of the document from the initial issuance to the most recent issue date and will include, to the best extent possible, a description of the changes that were made to the document. Ensure that any revisions that change the basis of the document are captured in IMC 0308 and / or associated attachments. For older documents without a history table, contact the NRR IM coordinator for instruction on how to search for older versions.

The revision history table and document headers and footers are the only places in an IMC, IP, TI or OpESS not required to show track changes when revised. If training is required, the training completion date (either actual or projected), is scheduled for a date prior to the document issue date (and effective date); the date and details are included in the revision history table.

When applicable, inspection program FBF numbers will be listed in the appropriate column of the history table. Only FBFs closed with the document issuance will be referenced in the revision history table. The ADAMS accession numbers of the document, closed FBFs, and comment resolution summary will be listed in the appropriate columns of the revision history table. To provide a historical record of the document, list the ADAMS accession numbers for previous revisions. The issue date will be filled in by the NRR IM coordinator prior to issuing the final document.

Note: The revision history table identifies certain commitments. In addition to being used as a mechanism for knowledge transfer and to generate the CN, it is also a way to quickly identify why the document was created or modified and the last time it was

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<sup>1</sup> A 4-year historical search consists of, but is not limited to, a review of generic inspection documents which may include SECY papers, Staff Requirements Memoranda (SRM) and other relevant program documents from an event or occurrence that have a direct impact on the inspection document.

reviewed. Documents **without** a revision history table will be returned to the originator for correction.

#### 06.07 Document Issuing Package.

It is the responsibility of the IM coordinator of the originating office to ensure that all documents are correctly formatted and that the comment resolution summary is profiled in ADAMS as non-public prior to routing to the NRR IM coordinator. Exhibits 5, 6, and 7 **as well as IMC 0040 Appendix A must** be used to meet this requirement. Documents failing to adhere to **these** guidelines will be returned to the IM coordinator of the originating office, and then to the originator for correction. Before routing the document to its IM coordinator, the originating organization will confirm the final version of the new or revised document (using the same accession number used for the draft IM document sent for comment), has been uploaded to ADAMS. The NMSS, and NSIR document originator, their organization's administrative staff, or IM coordinator, will also ensure that the DIF and comment resolution summary have been profiled into ADAMS as non-sensitive and non-publicly available (unless otherwise noted by their specific inspection program requirements). (NRR staff members do not need to create a document issuing package in ADAMS. The NRR IM coordinator will do that.) "Owner" rights to the final document, comment resolution summary, and DIF will be granted to the originating office IM coordinator and **to** the NRR IM coordinator. Once the inspection document package has been reviewed and corrected for formatting or ADAMS profiling (if necessary), the NRR IM coordinator will forward the entire package to the appropriate DRO branch chief, either IRAB **or** IRIB, for approval. **The IRIB and IRAB branch chiefs are the final approvers on Category 4 and 5 document revisions; for Categories 1 through 3, the documents will also need** DRO director or deputy director approval (see section 06.04d.8).

A complete document issuing package consists of the following documents:

1. **Document Issuing Form (DIF)**. A completed and signed **electronic** copy of the DIF; templates for each inspection program DIF are found in ADAMS (Accession numbers listed in exhibit 2). One DIF can be used for multiple documents as long as the documents have the same document lead. List each document and its accession number separately on the DIF. Do not list an ADAMS package accession number on a DIF. If more than one program office provides input to **create** or **revise** a document, additional signature lines may be added to the DIF. If the resources of another program office are anticipated to be used in the inspection activity, an additional line for the signature of a branch chief or division director / deputy division director of that program office must be added. Electronic template files of the DIFs (exhibit 2) are found in ADAMS. When profiled in ADAMS, "Owner" rights are given to the IM coordinator of the originating office as well as the NRR IM coordinator. **The NRR IM coordinator includes** the signed DIF in the final Change Notice ADAMS package as a non-public **document**.
2. **IM Document**. An **electronic** copy of the final version of the document to be issued. All documents must have an updated revision history table and will include the accession number of the comment resolution summary document where applicable. In addition, if the document revision caused a FBF to be closed, the FBF number and its accession number will be included **in** the revision history table. **It is best practice**

to send the ADAMS link rather than an email copy of the final document in order to ensure version control.

3. **Comment Resolution.** An electronic copy of or link to the comment resolution summary (see exhibit 4). The summary is profiled in ADAMS as non-public and will be copied into the ADAMS Change Notice package.
4. **Feedback Form.** When applicable, include an electronic copy of or link to any open FBFs that will be closed by issuing a new or revised document. The form should be completed by the document lead (and branch chief if applicable) as detailed in IMC 0801.

When profiling the final documents in ADAMS, NRC employees should refer to Management Directive (MD) 3.4, "Release of Information to the Public, MD 3.53, "NRC Records and Document Management Program," and NUREG/BR-0273, "ADAMS Desk Reference Guide." .

#### 06.08 Deleting Documents.

For documents in which the inspection activity is complete or no longer applicable, the originating organization **must** submit the DIF (exhibit 2), with the box "Deletion" checked and write the reason for deletion. The document will be removed from the active documents of the IM that are listed in the standalone TOC and **removed from the public website and the non-public SharePoint site**. The DIFs for each deleted document will be profiled in ADAMS and declared as official agency records.

#### 06.09 Inspection Manual Coordinator's Review.

Documents originating from NMSS or NSIR will **first** route to their respective IM coordinator for review. Upon satisfactory review, the originating IM coordinator will submit the document(s) to the NRR IM coordinator. NRR documents are routed directly to the NRR IM coordinator after administrative, or technical, staff have formatted **the document according to the following agency guidance:**

- Management Directive 3.57, "Correspondence Management," and OEDO Procedure 0357, "Correspondence Management"
- NUREG-1379, "NRC Editorial Style Guide"
- The Chicago Manual of Style Online accessible from [www.chicagomanualofstyle.org](http://www.chicagomanualofstyle.org).

Specific formatting standards for the IM are detailed in IMC 0040 Appendix A.

Documents submitted for issuance (IMCs, IPs, TIs or OpESSs) will be profiled in ADAMS based on the NRC Form 665 provided to the administrative staff by the document lead. **After review**, the NRR IM coordinator **may return documents that are not ready for issuance due to extensive formatting errors, missing information, rejection of the document by the approving branch chief , or non-adherence with IMC 0040 document structure (such as a missing Sample Requirements table for baseline procedures or a missing history table for any IM document)**. The package will be returned to the IM coordinator of the originating office or to the appropriate NRR division **document lead** for correction, as required. **It is the responsibility of the originating Office**

IM coordinator or the NRR document lead to resubmit the package to the NRR IM coordinator for review.

The NRR IM coordinator reviews **final documents** for publication or declaration as official agency records. This individual may make format and minor punctuation changes as needed prior to issuance as long as the overall intellectual content of the document is unchanged. Changes that might be made include minor formatting to ensure appropriate breaking across lines or pages, correction of verb tense, repairing footers, making format changes to comply with NRC style guides, and correcting list number/letter formats and indents. The NRR IM coordinator may also contact the lead for clarification of ambiguous content.

Baseline IP revisions that affect sample requirements in RPS-Inspections must be discussed with the document lead during the NRR IM coordinator's review and prior to issuing the revision. (The baseline IP table must be updated in RPS-Inspections by the NRR IM coordinator to prepare for the future inspection cycle.)

Once the document has been approved by the appropriate DRO branch chief, either IRAB or IRIB, for minor changes, and/or the DRO deputy director for substantial or policy changes, the NRR IM coordinator will ensure the document is published on the website, archived in ADAMS, and updated in the appropriate RPS module. The NRR IM coordinator will append titles of superseded ADAMS documents with "Superseded by [new ML#]" or "Obsoleted in CN yy-xxx" for deleted documents.

#### 06.10 Final Approval.

For documents from offices other than NRR, final approval of program documents for inclusion in the IM is given by the division director or deputy division director of the originating office. The NRR/DRO/IRIB (or IRAB) branch chief will approve revisions to existing documents, and deletions of inspection documents that are no longer relevant to the inspection program. The NRR DRO division director, or deputy division director, will approve new documents, major revisions (as defined in section 06.04d.8), changes in resources (hours/samples), and policy changes to an existing document. The NRR IM coordinator will publish the CN on the NRC Web site.

#### 06.11 Standard Distribution of Inspection Manual Documents.

New and revised IM documents are distributed by publication of a CN (see section 03.01j.).

Document leads within NRR will ensure that the document is distributed to any necessary staff in addition to the standard CN distribution list. IM coordinators and inspection program counterparts outside of NRR must ensure that the document gets the widest dissemination necessary in accordance with internal office policy.

Minor editorial changes to **recently-issued** documents (to update exhibits to match other documents, correct minor spelling errors, etc.), found within 6 months of the original issuance will be submitted by the document lead to the NRR IM coordinator, who will submit a request to either the IRAB or IRIB branch chief to replace the original document in ADAMS. Once the Document Processing Center replaces the document, the NRR IM coordinator will send out an email to the CN recipients to alert them of the change. Minor editorial changes **must** not affect the document pagination. If they do, a new document



will need to be issued by following the document issuing process described in this IMC. If minor editorial issues are found after the 6-month time frame, a new revision of the document will be issued by following the document issuing process.

## 0040-07 CONTINUOUS OVERSIGHT OF INSPECTION MANUAL DOCUMENTS

The following section discusses expectations for NRC staff who are assigned as leads for IPs and IMCs to ensure that documents are effectively developed and maintained.

### 07.01 Inspection Manual Chapters (IMCs) and Inspection Procedures (IPs)

- a. Five-year Review for Inspection Manual documents. To ensure all active inspection guidance documents remain relevant and assigned to the correct NRC office, the lead will conduct a periodic review every time a document is revised. Reviews must be conducted at least once every 5 years. This periodic review is not intended to be an in-depth programmatic review; it is intended to be detailed enough to provide sufficient justification for revising or deleting documents from the active IM or for transferring ownership of documents to another division or office. For ROP baseline documents, this review should coincide with the comprehensive baseline inspection program review detailed in IMC 0307, Appendix B.

To determine which IM documents will be transferred, revised, deleted, or designated as Reference, the following information is considered by the originating organization in the review:

1. time elapsed since documents were last revised.	
2. time elapsed since hours were charged to a document or since a document was used by an inspector.	
3. amount of time charged to documents in the last 10-15 years.	
4. type of facilities that documents are used to inspect.	
5. documents that have been superseded by other documents or programs (such as the ROP, Regulatory Guidance).	
6. documents associated with obsolete subject matter.	
7. all hyperlinks point to publicly available documents and webpages; exceptions are identified as non-public. NRC documents with Accession numbers shall only use hyperlinks to publicly available ADAMS documents unless notated as non-public.	
8. the point of contact (POC) information is correct; Regional organizations are cited correctly.	
9. the program applicability is current.	
10. in each inspection program, the requirements are clearly indicated per IMC 0040 and IMC 0040 Appendix A specifications (for example, use of bold font for baseline requirements, italics for commitments, or a table for ROP baseline hours/samples).	
11. the appropriate use of “may” / “must,” and “should” / “shall” to incorporate editorial and formatting issues not addressed previously.	
12. the use of “Plain Language” is incorporated as much as possible per the Plain Writing Act of 2010.	

Once the **Lead considers the** above information and **determines** that an extensive revision is not necessary, the document will be issued with a new issue date in the footer **by completing and submitting a 5-Year Review Checklist for Inspection Manual Chapters and Inspection Procedures (exhibit 9)**. The “Description of Change” column in the Revision History Table will state that a periodic review has been completed **and will include a description of the changes made as well as minor editorial changes (if any)**. Revisions that are not editorial in nature will **first be submitted via a Document for Comment review** process consistent with IMC 0040 **unless exempted by the IRIB/IRAB branch chief (NRR) or counterpart in NSIR and NMSS**.

If the review determines that the document is no longer needed for the inspection program, the document lead should engage with relevant stakeholders to **determine whether a redesignation as Reference Only or whether deletion is the correct path to take**; a DIF documenting the reason for the deletion **is submitted to the IM coordinator**. A comment resolution summary **or the completed review checklist** may be beneficial to document the reasons for deletion.

Designation as Reference, which is a rare occurrence, is completed by submitting the request to the lead’s supervisor and then to the NRR IM coordinator to process through the DRO/IRIB or IRAB branch chief for approval. Because documents designated as Reference are used but not inspected to, they do not need an ongoing 5-Year Review. However, the review may help determine the initial designation as Reference Only and should be provided to the branch chiefs with the request. If an inspection is to be charged to an existing reference IP, a 5-year review must be completed to return the IP to active status. The document may be re-issued with the inclusion of a 5-year review and DIF.

b. Ongoing Review for all Inspection Manual documents.

In addition to the 5-Year Review, document owners are responsible for the following practices:

1. Develop a thorough understanding of the basis for the provisions in assigned IPs and IMCs; changes should not be made without a corresponding review and change, if needed, to the associated basis document.
2. Maintain awareness of regulatory changes that could impact assigned IPs or IMCs (e.g., regulatory requirements, regulatory guides, licensee commitments, generic communications, state requirements, other government agencies) and update IPs and IMCs in a timely manner to reflect those changes when necessary.
3. Revise procedures, as needed, based on management direction, regional needs, and external stakeholder feedback.
4. Establish and maintain a professional working relationship with internal and external stakeholders. Maintain an open mind to feedback provided by these stakeholders and ensure all relevant views are considered when making changes to an IP or IMC.



5. Provide presentations and briefings to others, as needed (e.g., NRR, NMSS, and NSIR management, regions, external stakeholders). Ensure that references to the IM document on internal websites are current and relevant.
6. For baseline IPs, audit inspection reports, evaluate conformance with program guidance, and issue a written assessment via memorandum for management consideration according to internal office guidance.
7. On an annual basis, observe or participate in inspections and provide feedback via memorandum to regional and your Office's management, as appropriate.
8. Periodically attend regional inspector counterpart meetings to interact with, train, and solicit feedback from regional inspection staff and management.
9. Maintain a customer-focused approach when responding to requests for assistance from internal stakeholders. Ensure that responses are aligned with applicable NRC management and, to the extent possible, that appropriate support is provided in a timeframe commensurate with the needs of the inspection staff.
10. Identify new and innovative concepts to develop long-term enhancement and transformation of current practices.

#### 07.02 Temporary Instructions (TIs)

Temporary Instructions typically remain in effect for 12-24 months. It is the responsibility of the document lead to monitor that time period and submit a deletion when complete or a revision to modify the Completion Schedule and Expiration parameters. Overall, the lead should complete the following tasks:

- a. provide guidance for follow-up and closure of the TI, including specific regional responsibilities
- b. clearly distinguish mandatory requirements (see section 05.01e)
- c. review and analyze TI results
- d. give feedback to the appropriate managers, as necessary
- e. determine whether an additional inspection is needed as follow-up to the TI, and submit the DIF (exhibit 2) to the IM coordinator of the originating office when initiating, revising, or deleting the TI

#### 0040-08 DOCUMENT TYPES AND FORMATS

The IM is divided into 100 parts numbered 0000 through 9900 (0000 is the first part, 0100 is the second part, etc.). Inspection manual documents within the parts have 4-digit numbers (IMCs), 5-digit numbers (IPs), or 7-digit numbers (TIs). When a new inspection document (IMC, IP, or TI) is created, a number will be assigned by the NRR IM coordinator. The requestor must send an email to the NRR IM coordinator with the title and subject matter of the new document. **A placeholder will be included in the IM Table of Contents to reserve document numbers that are planned for a future release.**

## 08.01 Inspection Manual Chapters (IMCs).

Inspection Manual Chapters numbered 0000 through 1999 are used for policy statements on the inspection programs and the IM. Inspection Manual Chapters 2000 through 2999 define the various inspection programs. The first two digits of the IMC number identify the administrative or inspection category, and the last two digits identify the inspection program.

For example, the first two digits of IMC 2515 identify the inspection program (reactor), the third digit identifies the type of reactor (light water), and the fourth digit identifies the operational phase (operations) – “Light Water Reactor Inspection Program – Operations Phase.” Inspection manual chapters include the following most common headings (more can be added if necessary):

- a. Table of Contents (TOC). Due to the amount of information provided in an IMC, a TOC may be included to allow the user to make more efficient use of the document. **Formatting for the TOC is found in IMC 0040 Appendix A. In addition, documents formatted after 2022 shall include styled headings that allow quick navigation using bookmarks in the PDF or the navigation pane in the MS Word versions.**
- b. Section 01, “Purpose.” This section provides a broad statement of the topic covered by the IMC.
- c. Section 02, “Objectives.” This section is used to state the aim of the program or functions covered by the IMC. This section is not required if this information is already covered in section 01.
- d. Section 03, “Applicability.” This section identifies the type of facilities, operations, actions, or population for which the IMC is applicable. The applicability section is optional.
- e. Section 04, “Definitions.” This section can be used to provide a definition, which is only necessary if the term is used in a special sense or the meaning may not be clear to the user.
- f. Section 05, “Responsibilities and Authorities.” This section provides a brief description of ownerships arranged from higher to lower levels of authorities.
- g. Section 06, “Requirements.” This section is used to provide the specific instructions used to satisfy the mandatory inspection requirements of the IMC, and will use words that convey necessary conditions, such as “must,” “shall,” and “will”. **(See section 05.01e)**
- h. Section 07, “Guidance.” This section is used to provide specific guidance corresponding to the inspection requirements in the IMC but will only include discretionary provisions (such as “can,” “may,” “might,” and “should”). **(See section 05.01e)**
- i. Section 08, “References.” **Entries are** described in **section 05.04 of this manual.** Additional sections can be used beyond 07, as required, to provide better structure to the document.

## 08.02 Inspection Procedures.

Inspection Procedures (IPs) (including baseline, supplemental, reactive, and infrequently performed inspection procedures) are subdivisions of Parts 3000 – 9800 of the IM and describe the activities to be performed by an inspector to implement a part of an inspection program. Inspection Procedures consist of five-digit numbers. For example, the first two digits of IP 71111, “Reactor Safety-Initiating Events, Mitigating Systems, Barrier Integrity,” identify the part of the IM (7100 Operations (License & TS Requirements)), and the 111 is the sequence number of the procedures in Part 7100.

Pilot inspections are considered for new or substantially revised NRC requirements. The purpose of the pilot procedure is to determine and verify the inspection scope and requirements in an IP that will ensure the licensee is in compliance with either new or substantially revised NRC requirement(s). Pilot procedures require Commission approval per MD 8.13, “Reactor Oversight Process.” Pilot IPs can be in effect for several years and are cancelled once the results, as appropriate, are incorporated into the inspection program. All pilot procedures will align with the appropriate basis document, to the greatest extent possible. Pilot procedures are indicated in RRPS with a “P” suffix (for example IP 71111.00P).

Inspection Procedures include the following sections:

- a. “Program Applicability.” This section identifies the specific IMC(s) to which the IP applies; it will be reviewed and updated, as necessary, with each IP revision. (For example, IMC 2515A applies to the baseline inspection procedures.) Program applicability is not to be used as an over-arching reference to an inspection program parent document. If the procedure is not used directly toward an inspection, the inspection program parent document should be listed in the reference list.
- b. Section 01, “Inspection Objective(s).” This section states the aim or goal of the IP.
- c. Section 02, “Inspection Requirement(s).” This section describes the essential tasks that must be completed (requirements) to achieve IP objectives. This section must specify systems, components, and records to be inspected and inspection methods such as sampling (including sample sizes), observation, records review, and interviews. The IP should not involve excessive reviews of documents. Some auditing of documents (e.g., reports, analyses) may be necessary, but the emphasis will be on inspecting equipment and observing licensee activities. Ensure it is clear to the inspector which portions are mandatory and which, if any, are optional. (See section 05.01e for discretionary language.)

Document leads should ensure that requirements are applicable to meeting the inspection objectives and do not imply licensee requirements. Document leads should be aware of the backfit and forward fit evaluation and analysis requirements (See MD 8.4, “Management of Backfitting, Forward Fitting, Issue Finality, and Information Requests”).

- d. Section 03, “Inspection Guidance.” After each requirement, specific inspection guidance must follow. This section provides specific guidance to explain how individual requirements can be accomplished and alerts the inspector to potential problems by the use of discretionary provisions, such as, “can,” “may,” “might,” and “should”. Clearly

identify guidance so it will not be mistaken for additional inspection requirements. (See section 05.01e)

For existing procedures, the guidance must reflect experience gained or problems encountered in performing the inspection.

Note: The inspection guidance section may offer general as well as specific guidance. Each inspection requirement must have a specific number or letter assigned to it for identification purposes. The identifier will be used in the inspection guidance section to associate the specific guidance to the associated requirement. When there are two separate sections, if no guidance is given for a requirement, the corresponding identifier in the guidance section will use the phrase, “No inspection guidance.”

- e. Section 04, “Resource Estimate.” This section provides an estimate of the average time needed to complete the inspection (not including preparation and documentation time). This estimate is for broad resource planning and is not intended as a measure for judging the inspector’s or the region’s performance. Actual inspections may require substantially more or less time, depending on the individual circumstances.
- f. Section 05, “Procedure Completion.” This section defines the minimum sample size to be inspected and reported in RPS in order to consider the procedure complete. It also describes what constitutes an inspection sample and how samples are counted.
- g. Section 06, “References.” This section lists documents that will be immediately helpful to the inspector in performing the IP. The reference section is not intended to be a historical listing of documents about the inspection area. It will be limited to those references directly relevant to performing the procedure. See section 05.04 for more information on references.

### 08.03 Baseline Inspection Procedures

Baseline IPs are standalone IP attachments for the operating reactor, risk-informed, baseline inspection program. (For example, IP 71111.01, “Adverse Weather Protection,” is a standalone baseline inspection procedure to IP 71111, “Reactor Safety-Initiating Events, Mitigating Systems, Barrier Integrity.”) These baseline IPs include both requirements and guidance. For this program, the baseline IPs correspond to “inspectable areas” (as defined in program basis documentation) within the “cornerstones of safety” that form the foundation of the ROP (see IMC 2515, “Light-Water Reactor Inspection Program—Operations Phase”).

In addition to some of the headers used from the basis document, the operating reactor baseline IPs follow the same formatting requirements of the IPs. The headers listed on the first page of each baseline IP (and below) help the inspectors (and industry) understand specifically what is being inspected (exhibit 6.5). Document leads who own baseline IPs will notify the NRR IM coordinator of sample size changes, or additional sample requirements, prior to issuing the baseline IP for 30-day review. Ideally, the baseline IP will be issued in the year prior to when the change becomes effective. The effective date will then be January 1 of the next year or inspection cycle, and the RPS-Inspections baseline table will be updated to reflect the change in the next inspection cycle. At times, a baseline IP will be updated during the current inspection cycle to provide clarity within the IP itself; when the revision is issued, the effective date will be listed as July 1 of that inspection cycle. Samples or estimated resource hours

should not be changed when a revision has an effective date of July 1 (or any date after January 1) in the current inspection cycle. Exceptions may be granted with division director approval.

Baseline IPs include the following sections:

- a. PROGRAM APPLICABILITY: abbreviate as “IMC 0000 A”.

CORNERSTONE: Indicate applicable cornerstones, such as initiating events, mitigating systems, barrier integrity (as specified in IMC 2515 Appendix A, attachment 1) or “ALL”.

INSPECTION BASES: When applicable, list the bases IMCs (and/or specific sections of a document) that define the inspectable area for operating reactors - the reference will be to IMC 0308 Attachment 2.

- b. SAMPLE REQUIREMENTS: This is a quick-reference table at the beginning of the IP which lists specific sample types; minimum, nominal, and maximum sample sizes; per-unit or per-technology sample requirements; a budgeted range of hours per site or unit; frequency of inspections (e.g., annual, biennial, triennial, or when required); and other quick references to aid inspectors in the field. See exhibit 6.5 for an example table.

The table defines the number of required sample reviews and the hours necessary to complete the reviews, as described in the IP attachment. The program office branch chief in DRO may approve a new frequency term and description or definition based on program needs. If multiple types of samples in a procedure have specific requirements to ensure completion of the procedure, each of these specific sample requirements will be addressed in the Sample Requirements table. For clarity, the table will separate AP1000 samples (if different) from non-AP1000 samples. Requests to change frequency information to existing procedures must be approved by the appropriate program office division director or deputy division director.

To the extent practicable, future additions to the inspection program should be incorporated into the sample requirements of existing baseline IPs or replace existing baseline procedures. The intent of this statement is for new baseline inspection program elements to take credit for existing program elements or replace existing baseline procedures, if possible, so that overall baseline program hours are not unnecessarily increased. Proposed increases to the inspection program should typically be offset by reductions in other IPs and should be approved by the director, Division of Reactor Oversight.

- c. Standalone attachments, such as baseline IPs, will follow the document formatting requirements that all inspection documents follow, to the greatest extent possible, as outlined and defined in IMC 0040 Appendix A.

The baseline IPs will follow the format and content of the IPs, as described above, with the following exceptions:

1. Section 02, “General Guidance.” This section provides general guidance that corresponds to each inspection requirement and may include discretionary provisions (as described in section 05.01e), such as “can,” “may,” “might,” and “should”. In addition, this section should discuss sample considerations with risk priority and specific examples.

2. Section 03, "Inspection Requirements." This section will list each inspection sample with specific sample requirements. The specific requirement of each sample will be emphasized in bold font for baseline IPs only. Specific guidance will follow each described sample.
3. Section 04, "References." See section 05.04 in this manual for instructions.

Any changes made to the baseline IP requirements must be reviewed with the document lead. Upon issuance of the IP, the NRR IM coordinator will add or revise the requirements in the baseline IP table of the RPS-Inspections module. In addition, any changes made to scope text, must be added or revised by the NRR IM coordinator in the Auto Report Generation template of RPS-Inspections prior to, or upon issuance, of the baseline IP.

#### 08.04 Temporary Instructions (TIs)

Temporary instructions are issued with a number that includes the number of the IMC with which the TI is associated, followed by a sequence number. For example, TI 2515/102 would be the 102<sup>nd</sup> TI issued under the operating phase of the light water reactor inspection program (IMC 2515).

TIs are issued to supplement an inspection program and generally are placed in effect for a period of 12 to 24 months. They are used for a one-time, initial inspection of a safety issue or a one-time collection of information. TI are not used to provide policy and guidance information to the licensee. If a TI will be in effect for more than 24 months, special justification is required.

Requests for new ROP TIs must be directed to the Reactor Inspection branch chief (NRR/DRO/IRIB) to obtain approval for budget estimates. A soon as the need for a TI is identified, a request is made via e-mail, after completing the non-public ROP TI Request Form (ML16312A370). The request will include the following:

- necessary background information to understand why a TI is required or warranted;
- include reasoning to explain why it should not be obtained by other means (for example, OpESS or generic communication); an estimate of required resources and site applicability;
- an assessment of the safety or security significance providing justification for such resource expenditures; and
- the estimated dates for start and completion.

The IRIB branch chief will discuss the proposed TI with the regional counterparts to obtain their views on the implications of the proposed TI. If the IRIB branch chief approves the TI request, it will be forwarded to the DRO division or deputy division director to provide final approval to proceed with the TI, or denial to issue the TI. If the TI meets the notification requirements criteria for Commission approval or notification, the appropriate steps will be taken prior to issuance.

A TI is, on average, a 10- to 25-page document that is in effect for a 12- to 24-month period. Their purpose is to have inspectors concentrate on a specific, current issue, not



an **on an** overall program. Any TI that will be more than 25 pages should consider specifically what it is asking the inspectors to do. If a TI will be in effect for less than 12 months, or more than 24 months, the originator must provide a special justification to the NRR/DRO/IRIB branch chief by email. The request to extend the TI should be received in a timely manner prior to its expiration.

Each TI has an expected completion date, as well as an expiration date. If the stated purpose of the TI has not been accomplished by the expiration date, or if there is a need to add clarification to existing requirements and guidance, the originating organization may revise and reissue the TI. The revised TI must be accompanied by a DIF (exhibit 2) justifying the re-issuance. TIs are the only IM documents that use revision numbers. Revisions of other IM documents are indicated only by the new issue date. TIs will contain the following information:

- a. Cornerstone (for ROP TIs only). Lists the cornerstone(s) for which the TI is applicable.
- b. Applicability. Identifies the facility or facilities, site(s), and unit(s) for which the TI is applicable.
- c. Section 01, "Objective(s)." Lists the **goal(s) or aim(s)** of the TI. For multiple objectives, use a bulleted list. This section also states whether the nature of the TI is performance-based or information-gathering.
- d. Section 02, "Background." This section provides critical and pertinent information required to understanding the generic issue and assist in the implementation of the TI. This section will specifically describe the reasons why this TI is being issued, including an assessment of the safety or security significance and justification of resource expenditures.
- e. Section 03, "Inspection Requirements." This section presents, a **numbered** list of distinct, concise statements **which** specify inspection items that need to be accomplished in order to meet the objective(s) stated in Section 01. Each numbered requirement shall be followed by specific guidance to implement the requirement. This section must specify systems, **structures**, components, and records to be inspected **as well as** inspection methods such as sampling (including sample sizes, if necessary), observation, records review, and interviews. The TI should not involve excessive reviews of documents. Some auditing of documents (**for example**, reports **and** analyses) may be necessary, but the emphasis will be on inspecting equipment and observing licensee activities. Ensure it is clear to the inspector what portions are mandatory and what, if any, are **discretionary/optional (section 05.01e)**.
- f. Section 04, "Inspection Guidance." After each requirement, specific inspection guidance must follow. **This section provides** specific guidance **to** explain how individual requirements can be accomplished and alerts the inspector to potential problems by the use of discretionary provisions, such as, "can," "may," "might," and "should." (**See section 05.01e.**) Clearly identify guidance so it will not be mistaken for additional inspection requirements. For new TIs, the guidance section can be used to tell the inspector how the originating office intended the requirements to be accomplished. For existing TIs, the guidance must reflect experience gained or problems encountered in performing the inspection.

TIs emphasize **observation of activities**. They are not to be used for solely reviewing documents. TI requirements are to be performance based, clearly stated, and focused on the implementation of programs, modifications, and procedures. However, TIs that are information gathering by nature may involve inspection requirements for agency inspectors that are slightly different from performance-based requirements. Revisions of existing TIs may have separate sections for inspection requirements and inspection guidance based on specific organizational needs.

- g. Section 05, "Reporting Requirements." This section states where and how the TI results will be documented. In most cases, TI results are documented in inspection reports, in accordance with IMC 0611, "Power Reactor Inspection Reports." The TI will specify the location and information required to be documented. In cases where the inspection results are not to be documented in a routine inspection report, sufficient additional information must be provided regarding the specific reporting requirements. Any non-standard distribution of reports documenting the TI inspections must be specified in this section and agreed upon by management. An example of non-standard documentation of a TI would be filling out a table that is attached to the TI and emailing it to NRR for review.
- h. Section 06, "Completion Schedule." This section includes an expected date for TI inspection completion. This date should be reasonable and should precede the expiration date of the TI to allow the originating organization sufficient time to interpret, analyze, and report the TI results. For ROP TIs, completion dates should be the last day of a calendar year quarter (March 31, June 30, September 30, or December 31).
- i. Section 07, "Expiration." This section states the effective duration of the TI and includes an expiration date, which marks the official end of the TI. In establishing the expiration date for TIs under the ROP, consider the amount of time beyond the completion date **that** the staff will need to complete the inspection report and associated enforcement activities. After the expiration date (usually 6 months after the completion date), no resources will be charged to the TI, and the originating organization will follow the procedures described in **section 06.08** of this IMC to delete the TI from the IM.
- j. Section 08, "Contact(s)." This section identifies the originating organization (office, division, and branch) and the name, phone number, and email address of document contact(s) who are designated to answer questions about the TI. Usually, the author of the TI is considered the lead document contact. Other document contacts may include, but are not limited to, other staff within the branch and the immediate supervisor of the document lead.
- k. Section 09, "Statistical Data Reporting." This section identifies TI number(s), the associated system codes (**for example**, Inspection Planning Element (IPE) and activity codes) for the TI and, if necessary, the IP and code to which an inspector will charge time for any follow-up inspections after the TI has been completed. For ROP-related TIs, all inspection effort must be charged to TI 2515/XXX (which represents the number of the TI), the IPE code of **the** TI, and the activity code of **Temp Instruction Preparation-Documentation (TPD)** for preparing and documenting TI inspections (IMC 2515).
- l. Section 10, "Resource Estimate." This section presents an estimate of the direct inspection effort (DIE) in hours per unit or site needed to complete the TI inspection requirements. The estimated average time includes a low to high estimate band. If the resources during the implementation of the TI can be attributed to other IPs other than



the TI, provide a list of potentially applicable IPs, and an estimate (in hours) of the potential usage.

- m. Section 11, "Training." This section states the required training needed in order to successfully accomplish the inspection requirements. If the necessary training needed is covered by a program office's general training and qualification program (e.g., IMC 1245, "Qualification Program for Reactor Inspectors") then stating the applicable appendix of the training IMC will suffice. **As stated in section 06.01, the training should be completed prior to issuance of the TI and summarized in the TI History Table at the end of the document.**
- n. Section 12, "References." This section lists documents that will be immediately helpful to the inspector in performing the TI. **See section 05.04 in this manual for specific instructions.**

When the originating organization determines that the stated purpose of the TI has been accomplished, it will prepare a final report documenting the TI results for distribution to pertinent staff no later than the expiration date. The final report may also recommend additional inspections or changes to the inspection program. In those cases, the originating organization shall add the appropriate branch chief (for the ROP, IRIB or IRAB), to the distribution.

When the stated purpose of the TI has been accomplished, the originating organization will delete the TI by submitting a DIF (exhibit 2) to the IM coordinator. All TIs shall be deleted by the expiration date.

#### 08.05 Operating Experience Smart Samples (OpESSs).

OpESSs may be employed to inform and enhance ROP inspection of selected OpE issues determined to have potential generic safety implications. OpESSs are only developed when an inspection can be accomplished within existing ROP inspection requirements and level of effort. Issues that cannot be addressed within existing ROP inspection requirements and level of effort should be considered for a one-time inspection under a TI.

OpESSs contain the following information:

- a. Cornerstone. This section lists the cornerstone(s) for which the OpESS is applicable. The cornerstone(s) may include one or all of the cornerstones listed for the ROP pertinent inspection procedure(s).
- b. Applicability. This section identifies the type of plant (e.g., PWR, BWR, CE, Mark 1 containment, **AP 1000**, etc.) that is affected or could be inspected under the OpESS.
- c. Section 01, "Objective(s)." This section lists the objective(s) of the OpESS. The objective(s) may be more **detailed** than those specified in the selected IP(s) but must be congruent with the stated objective(s) of the selected IP(s).
- d. Section 02, "Background." This section presents OpE associated with the OpESS and relevant research and references.

- e. Section 03, "Inspection Guidance." This section provides the information and links for inspectors to use during inspection of the OpESS. Include a list of applicable ROP baseline IP(s) and how the OpESS satisfies one (or more) of the sample requirements for the IP(s). The guidance may be more **detailed** than those specified in the selected IP(s) but must be congruent with the stated objective(s) of the selected IP(s).
- f. Section 04, "References." This section provides a list of documents that will be helpful to the inspector in performing the OpESS. These may include related generic communications, management briefing slides, Regulatory Guides, previous related inspection findings, and OpE communications. Include hyperlinks to public documents when available.
- g. Section 05, "Reporting Results/Time Charges/Additional Issues." This section provides reporting results, time charges, and additional issues. In general, OpESS results **are** documented and inspection reports distributed in accordance with guidance specific to existing IP(s) and IMC 0611, "Power Reactor Inspection Reports." Any guidance on non-standard documentation or distribution will be specified in this section. In addition, this section provides guidance on how inspectors are to charge their time under the baseline ROP inspection program.
- h. Section 06, "Contact(s)." This section identifies the name, phone number, and email address of the document contact(s) who are designated to answer questions about the OpESS. This is generally the OpESS author and applicable NRR contacts. This contact information may be redacted from the OpESS posted on the NRC public webpage.
- i. Attachments. This section may be used as necessary to provide additional information related to the OpESS.

#### 08.06 Appendix.

An appendix incorporated within an IMC, IP, or TI will contain supplementary guidance material about the parent document. Appendices must pertain to the IMC, IP, or TI to which they are appended within the document itself and follow the format of the parent document to the greatest extent possible. They do not contain policies, responsibilities, or requirements, which have been discussed in the parent document. **There are few format requirements for an appendix. The following document types (See section 0040-08) may become an appendix:**

- a table or series of tables
- a figure or series of figures
- an outline
- a report
- any combination of these items

A standalone IMC appendix format will follow the parent IMC format as much as possible, and, on rare occasions, may contain additional policies, responsibilities, or requirements that are not discussed in the basic document. Exceptions to this rule must be documented in the revision history table. Both incorporated and unincorporated appendices will be depicted by a letter (A, B, C, etc.) in the appendix title. **Exceptions may be granted when appendices correspond to a series of criteria; for instance, Criterion I through XII could be contained in Appendices 1 through 12.** (Several security

documents use the term “Addendum” instead of “Appendix”. The use of addendum, which has been utilized since the beginning of the Security ROP, is only found in a small number of security documents that have been vetted through industry. Because industry has seen, utilized, and referenced these documents, it would be difficult to change the documentation that uses “Addendum” instead of “Appendix”. Only security documents will use the term “Addendum”. All others must use the term “Appendix”.)

Unincorporated appendices for IPs and TIs are extremely rare but must follow the parent document to the greatest extent possible. See sections 08.02 and 08.04 for section header information.

See section 08.01 and exhibit 6.2 for IMC section headers and further information.

- a. Section 01. “Purpose.” This section briefly explains why an appendix is being provided.
- b. Section 02. “Background.” This section provides necessary information to understand the guidance of the appendix, as well as its context.
- c. Section 03. “Applicability.” This section identifies the type of facilities, operations, actions, or population for which the IMC is applicable. The applicability section is optional.
- d. Section 04. “Definitions.” This section provides a definition that is only necessary if the term is used in a special sense or the meaning may not be clear to the user.
- e. Section 05. “Responsibilities and Authorities.” This section provides a brief description of ownerships arranged from higher to lower levels of authorities.
- f. Section 06. “Requirements.” This section is used to provide the specific instructions of the IMC.
- g. Section 07. “Guidance.” This section is used to provide specific guidance to this IMC. Additional sections can be used beyond 07, as required, to provide better structure to the document—in this case, References will be the last section.
- h. Section 08. “References.” Entries are described in section 05.04 of this manual.

#### 08.07 Attachment.

An attachment incorporated within an IMC, IP or TI will contain additional instructional material. Attachments must pertain to the IMC, IP, or TI to which they are appended. They will not reiterate policies, responsibilities, or requirements, which are covered in the basic document. An attachment format, either incorporated or unincorporated, will follow the parent document format as much as possible. The attachment will be depicted by a number (1, 2, 3, etc.) in the title which corresponds to the parent document when possible. If an unincorporated attachment cannot follow the format of the parent document, the exception must be documented in the revision history table.) There are few format requirements for an attachment. The following document types (See section 0040-08) may become an attachment:

- a table or series of tables
- a figure or series of figures

- an outline
- a report
- any combination of these items

A standard exception to the format of an attachment would be the revision history table. The revision history table is an inclusive attachment to an IMC, IP, TI, and OpESS; it outlines the revisions made to the document on a summary page and follows its' own format, which is outlined in exhibit 6.3. Revision History tables are created with the initial issuance of an IMC, IP, or TI, and updated with every revision. The Description of Change column describes what was changed and why.

#### 08.08 Table.

Every incorporated table will have a title and a number (Table 1, 2, etc.) and will be cited in the text by that number. Standalone tables will follow the format of the parent document to the greatest extent possible. Standalone tables that are the exception to this rule must document the reason for not following the parent document format in the revision history table.

#### 08.09 Figure.

Every figure will have a number (figure 1, 2, etc.) and be cited in the text by that number. In general, figures should have captions (title, full-sentence explanation, or both). The NRC Graphic Services Section, Office of Administration, is available to prepare figures. In addition, a figure or series of figures may become a standalone appendix or attachment. There are few structural or formatting requirements for figures.

#### 08.10 Exhibit.

Every exhibit will be numbered (exhibit 1, 2, etc.) and be cited in the text by that number. Exhibits, both incorporated within a parent document and standalone, will follow the format of the parent document to the greatest extent possible. Exceptions to this rule in the standalone exhibit must be documented in the revision history table.

#### 08.11 Issue Date.

The issue date is on each page of the document. The actual date will be entered by the NRR IM coordinator before the document is issued. It is distinct from the Effective Date, but it can be the same date if the Effective Date is "upon issuance."

#### 08.12 Document Number.

The document number is located on the bottom right section of the footer of all pages containing an issue date. Revisions of IM documents have the same number as the original document. The NRR IM coordinator is responsible for assigning numbers for new IM documents. Office IM coordinators (NMSS/NSIR) and NRR document originators will send a request to the NRR IM coordinator to reserve numbers for new IM documents before the document issuing package is prepared.

0040-09 REFERENCES

5 CFR 1320, "Controlling Paperwork Burdens On the Public."

IMC 0040 Appendix A, "Word Processing Format Directions and Guidance for Inspection Manual Documents"

CUI-STD-1000, "Nuclear Regulatory Commission Controlled Unclassified Information Standard"

IMC 0307 Appendix B, "Reactor Oversight Process Self-Assessment Baseline Inspection Program Monitoring and Comprehensive Review"

IMC 0308, "Reactor Oversight Process Basis Document"

IMC 0611, "Power Reactor Inspection Reports"

IMC 0801, "Inspection Program Feedback Process"

IMC 1245, "Qualification Program for Reactor Inspectors"

IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase"

IMC 2523, "NRC Application of the Reactor Operating Experience Program in NRC Oversight Processes"

IMC 2600 Appendix A, "Guidance for Conducting Fuel Cycle Inspections Fuel Cycle Facility Terminology"

Management Directive (MD) 3.4, "Release of Information to the Public"

MD 3.53, "NRC Records and Document Management Program"

MD 3.57, "Correspondence Management"

MD 8.4, "Management of Backfitting, Forward Fitting, Issue Finality, and Information Requests"

MD 8.13, "Reactor Oversight Process"

MD 12.6, "NRC Controlled Unclassified Information (CUI) Program"

Memorandum (ML19219A225), "Staff Expectations for Inspection Procedure and Inspection Manual Leads of Reactor Oversight Process Governance Documents" 08/08/2019

NUREG-0910, "NRC Comprehensive Records Disposition Schedule"

NUREG-1379, "NRC Editorial Style Guide"

NUREG/BR-0273, "ADAMS Desk Reference Guide" (Non-Public)

OEDO Procedure 0357, "Correspondence Management" (Non-Public)

OIG-16-A-12, "Audit of NRC's Reactor Oversight Process: Reactor Safety Baseline Inspection Procedures" (ML16097A515)

Plain Language Action Plan (internal website)

The Chicago Manual of Style Online

U.S. Government Printing Office Style Manual

Yellow Announcement 20-0042 and Management Directive (MD) 12.6, "NRC Sensitive Unclassified Information Security Program." (Non-Public)

END

Exhibits:

1. Pictorial view of IMCs, IPs and Supporting Documents
2. Document Issuing Form(s) (DIF)
3. Example of Document for Comment Memo
4. Example of Comment Resolution Summary
5. Example of Revision History Table
6. Examples of Inspection Manual Documents
  - (a) E6.1 Inspection Manual Chapter Example
  - (b) E6.2 Inspection Manual Chapter Appendix Example
  - (c) E6.3 Inspection Manual Chapter Attachment Example
  - (d) E6.4 Inspection Procedure Example
  - (e) Inspection Procedure Attachment Example
  - (f) Temporary Instruction Example
  - (g) Operator Experience Smart Sample Example
7. Example of a Reference List
8. Example of a Change Notice
9. Example of 5-Year Review Checklist

Attachments:

Attachment 1: Revision History for IMC 0040



Exhibit 1: Pictorial View of IMCs, IPs, and Supporting Documentation

Exhibit 1: Pictorial View of IMCs, IPs, and Supporting Documentation

**Inspection Manual Chapters: (Policy)**

- \* Written statements of policy that cover most NRC oversight and inspection program areas (e.g. reactors, materials, fuel facilities, etc.
- \* State the purpose, objectives, definitions, responsibilities, authorities, and basic requirements for inspection programs.
- \* Defines the program through a listing of inspection procedures, which is normally appended to the IMC

**Inspection Procedures: (Implementation of Policy)**

- \* A statement of objectives, requirements, and specific guidance for inspection activities- which are focused on safety, security, or safeguards.
- \* Describe the activities performed by an inspector or technical staff-including administrative requirements

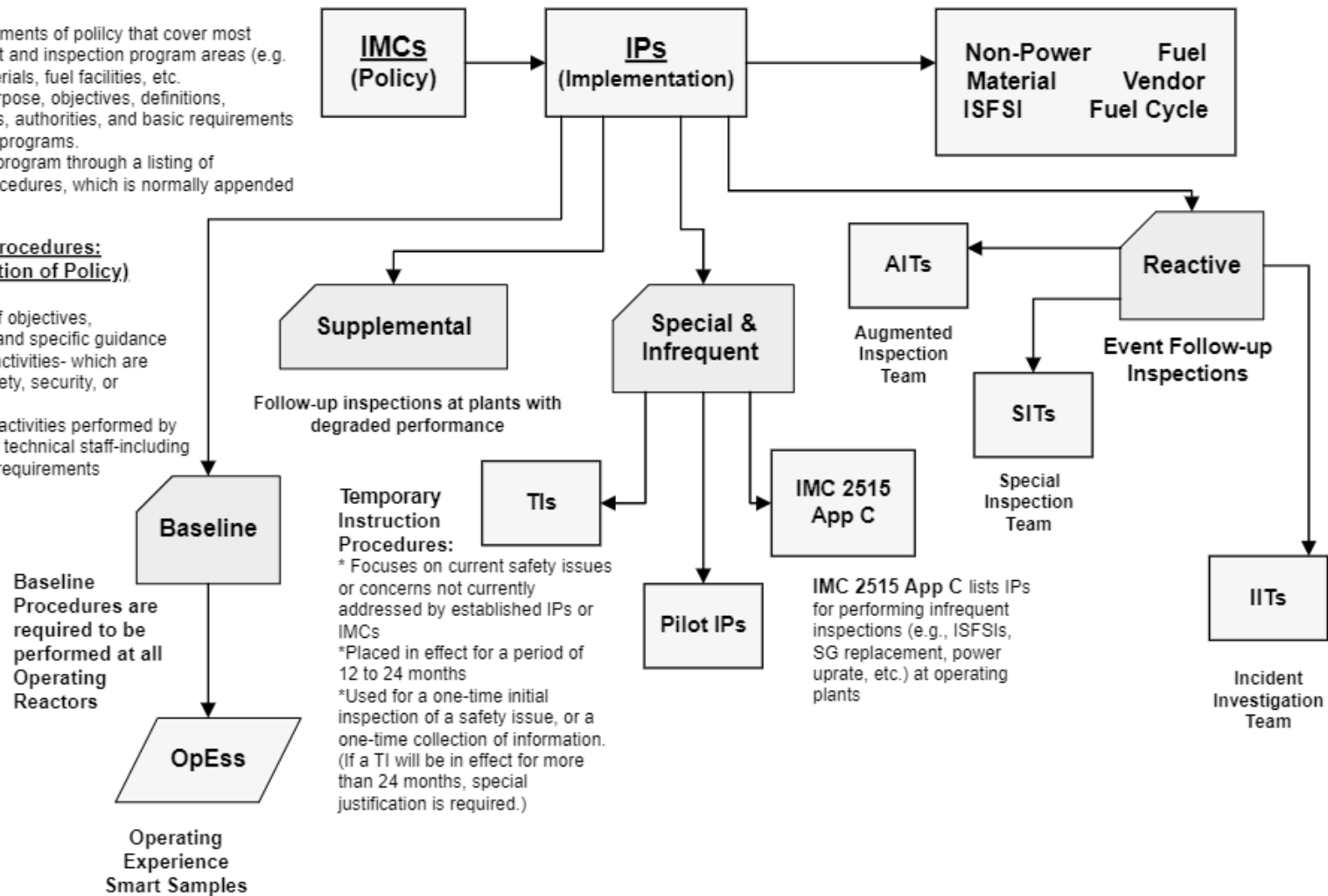


Exhibit 2: Document Issuing Forms (DIF)

An example of the two-page NRR DIF:

NRR Document Issuing Form (DIF)

To: NRR Inspection Manual Coordinator

1. Number and Title of Document: Click or tap here to enter text.  
Document ML#(s):\_Click or tap here to enter text.  
Proposed Effective Date: Click or tap to enter a date.
2. Type of Document (click checkboxes to check or uncheck)  
 Inspection Manual Chapter (IMC)       Inspection Procedure (IP)  
 Temporary Instruction (TI)       OpESS (Operating Smart Sample)
3. Type of Action:       New document       Revision:       Deletion  
Reason for deletion: Click or tap here to enter text.
4. For new/revised documents (ROP only) that change Baseline requirements (e.g., Samples and/or Hours):  
 Baseline IP Table needs to be updated - *(IM Coordinator to update RPS)*  
*(Increase in hours requires DRO Director approval)*  
 Cover letter and report templates need to be changed (IMC 0611)  
*[See RPS-Inspection Report IP 29 for ghost text]*
5.  Comments received by stakeholders (ROP), but not incorporated in the final version, were discussed with the commenter. (IMC 0040 Section 06.05)
6. Does the issuance of this document require the revision of IMC 0308, "Reactor Oversight Process Basis Document," or another IMC or IP (such as IMC 2515 Appendix A or IP 71111)?  Yes  No  
If Yes, list the document number(s) and explanation; **also notify the document Lead.**   
Click or tap here to enter text.

---

7. **Does this change require Commission notification or approval prior to implementation per MD 8.13?**  Yes  No    If "no," skip to #8 below.  
  
Provide the date of the briefing or documentation reference number (CA Note, ADAMS#, etc.) in the Description of Change column in the Revision History table of the IMC, IP or TI being issued.  
Click or tap here to enter text.  
  
If an effectiveness review will be performed per IMC 0307, provide the specific information to be reviewed, including data sources (if applicable), and the duration of monitoring needed to determine change effectiveness and any unintended consequences. (Note: To the maximum extent possible, this will use existing ROP program sources of data—e.g., RPS and CACS—and the proposed monitoring duration of typically 1 to 2 years).  
Click or tap here to enter text.
8.  **Document does not establish nor interpret regulatory requirements.**

9. Route the following to the NRR Inspection Manual Coordinator:
  - a. A completed and signed electronic copy of the document issuing form (DIF).
  - b. A link to the final, updated IMC document in ADAMS with track changes indicated in red per Exhibit 10 in IMC 0040 (no deletions or formatting changes visible). Provide link to Doc for Comment package if applicable.
  - c. A link to the ADAMS copy of the completed Comment Resolution Summary.
  - d. List and attach (or link) any feedback forms associated with this document revision.

Ensure that the NRR Inspection Manual Coordinator has "Owner" rights to the documents in ADAMS (IMC document, Comment Resolution, Feedback Forms).

Complete SUNSI Review for public documents –  
(Provide Form 665 if not currently input or correctly profiled in ADAMS)

10. Is training / **knowledge management** needed?  Yes  No

If yes, provide type of training and date of completion:

[Click or tap here to enter text.](#)

11. Does this inspection use the resources of another office?  Yes  No

If yes, add a signature line for the Branch Chief of the other office.

12. **Change Type: Category 1**  **2**  **3**  **4**  **5**   
(See IMC 0040 section 06.04d.8)

Notes: [Click or tap here to enter text.](#)

**Approval Signatures (Print and Signature/ Organization)** (sign/date in white space above print)

<b>x</b>		<b>x</b>	
Name, Organization a) Originator	Date	Name d) Chief, DRO IRAB/IRIB	Date
<b>x</b>			
Name, Organization b) Originator's Supervisor	Date	e)	
<b>x</b>		<b>x</b>	
Madeleine Arel, DRO/IRIB c) NRR Inspection Manual Coordinator	Date	Name f) Deputy Director, DRO required for <b>Category 1 through 3 changes</b>	Date

DIF Accession No. [Click or tap here to enter text.](#)

END

The DIFs for NMSS, NRR, **VPO**, and NSIR can be found in ADAMS:

NMSS: ML16308A304

NSIR: ML16308A307

NRR: ML16308A237

**VPO: ML16308A305**

Exhibit 3: Example of Document for Comment Memo

MEMORANDUM TO: Those on the Enclosed List

FROM: "Branch Chief Name," Chief  
Reactor Inspection Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

SUBJECT: IMC/IP XXXXX DOCUMENT FOR COMMENT MEMORANDUM  
(DC 23-XXX)

Enclosed for your review and comment are documents for which changes are being proposed. The Office of Nuclear Reactor Regulation technical contacts are listed, along with a summary of changes.

To facilitate timely issuance, please comment on the specific changes being made to the document. If you wish to make other comments to improve the document, please use the feedback process described in Inspection Manual Chapter 0801, "Reactor Oversight Process Feedback Program."

*Please note that in order to view the proposed revisions to the draft document(s) in MS Word, the local settings of your computer need to be set **per the instructions at the end of this memo**.*

**IMC XXXX Appendix X, "Insert IMC Title Here"**

**Technical** Lead: "Document Lead", "OFFICE/DIVISION/BRANCH", 301-415-XXXX, "document.lead"@nrc.gov.

**This change is a significant change (Category X as defined in section 0604d.8(c) of IMC 0040) that affects the following:** (insert reason for change here)

Please **coordinate** your comments **through your office IM coordinator or regional TSB branch, who will then send them to the document lead identified in the memorandum** and to "name of IM coordinator", NRR/DRO/IRIB; 301-415-XXXX; e-mail: "first.last"@nrc.gov, within 30 days of the date of this memorandum.

CONTACT: "IM Coordinator", NRR/DRO/IRIB  
301-415-XXXX

***Recommended MS Word settings on your PC to see all detailed change markings:***  
*(These settings are local to your PC and cannot be encoded into the document)*

- 1. On the ribbon, click the "Review" tab (reviewing toolbar is displayed)*
- 2. In the "Tracking" group, use the pull-down menus to display "All Markup"*
- 3. Click on the arrow symbol in the lower right corner of the Tracking group to display "Change Tracking Options."*
- 4. Click the "Advanced Options" button ("Advanced Track Changes Options" panel opens)*

5. Under "Markup," set Insertions to "Color only" color "red" and "Deletions" to "Strikethrough" color "Gray-25%" or "red"
6. Click "OK" to close panels

**Recommended MS Word settings modification from above to see the document with redline additions only :**

1. Repeat steps 1-4 above
2. Under Markup, set Insertions to "Color only" color "red" and "Deletions" to "Hidden"
3. Click "OK" button on bottom (Advanced Track Changes Options panel closes revealing Track Changes Options panel)
4. Under "Show," uncheck all but "Insertions and Deletions" click "OK" button.
5. Click "OK" to close panels

Exhibit 4: Example of Comment Resolution Summary

Comment Resolution Summary (ML01001A000)

Resolution of Comments for IMC/IP 0000 (ML01001A001)

Date: Month dd, yyyy

Source	Section #	Comment	Added	Remarks
VPO			Yes	No remarks necessary if comment incorporated in full.
NRR			No	Explain why comment not incorporated into program document.
NSIR			Partial	Explain why, if comment only partially incorporated.
OE				
R1				
R2				
R3				
R4				
NMSS				

This tabular list can be portrait or landscape format, at the document lead's discretion.

The footer date and title date will reflect the final document issue date once determined by the NRR IM coordinator.

[Word version template: ML16333A293]

[Excel version template: ML16333A291]



Document for Comment Record

IMC 0000 (Title)

Link to package: [Doc for Comment 22-xxx IMC xxxx](#)

Due Month day, 2022

Source	Authorized Regional or HQ Responder	Date completed	Comment	Added Y / N	Lead Remarks
R5	Jane Smith	1/1/22	Editorial comments in document. See separate comment resolution table for more extensive comments.		
VPO					
NRR					
NSIR					
OE					
R1					
R2					
R3					
R4					
NMSS					

Use this document to comment on proposed changes. Use @name in comments to tag the lead for an interactive response.

\*\*This table may be added by the NRR IM coordinator as the first page of a dedicated Comment Version of the IM document used for collaborative review.

Exhibit 5: Example of Revision History Table

Attachment 1: Revision History for IP 00000.01

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training / Knowledge Management Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	ML020000001 03/17/02 CN 02-000	First issuance. Completed 4-year search for commitments and found none.	None	N/A
N/A	ML040001002 11/18/04 CN 04-000	Revised to include feedback from inspectors and for editorial changes	None	N/A
C-1 Reference: Generic Letter (GL) 14-01	ML14000A001 06/16/14 CN 14-000	Incorporated comments of GL 04-01	Web-based training for all power reactor inspectors	Incorporated comments of GL 04-01
N/A	ML date CN	Revised to change sample size and clarify inspection guidance. Feedback forms were resolved.	None	ML20366A123  Closed FBFs: 00000.01-0001 ML16001A000 00000.01-999 ML21001A123

The last row demonstrates a document sent to the IM coordinator for re-issuance.

[Revision History Table template: ML16333A296]

Exhibit 6: Examples of Inspection Manual Documents

E6.1 INSPECTION MANUAL CHAPTER EXAMPLE

[IMC template: ML22081A397]

# NRC INSPECTION MANUAL

ABCD

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## INSPECTION MANUAL CHAPTER 0000

---

### TITLE

Effective Date: (if necessary)

#### 0000-01 PURPOSE

This is a broad statement of the function or subject matter covered by the manual chapter. It may also be used to state aspects of the function not covered in the subject matter.

#### 0000-02 OBJECTIVES

This section is used to state the aim(s) of the program or functions covered by the chapter. The objective(s) may be implicit in the statement of purpose (section 01, above). In that case this section may not be necessary. If a statement of policy is more appropriate, "policy" may be substituted for "objective(s)." The section may be subdivided and paragraphed as follows (do not use 02.01 unless there is a section 02.02):

02.01 X xx x xxxxxx xxxx xxxxxx xxxxxx x x xxxxxxxx xxxxxx xxxx xxxxxxxx xxxxxxxx x x xx  
xxxxxx xxxx xxxxxxxxxxxx x xxxxxxxx xxxxxx xxxx.

Xxxx xx xxx xxxxxxxx xxxx x x xxxxxxxxxxxxxx x x xxxxxxxx xxxxxxxx x xx xxxxxx xxxxxx x  
xxxxxx x.

02.02 XXXXXXXXXXXXXXXXXXXX. Xxx xxxx x xxxxxxx xxxxxx xxxxxxxx xxxxxxxx x xxxx xxxxxx xx  
xxxx.

#### 0000-03 APPLICABILITY

#### 0000-04 DEFINITIONS

Definitions are given only if terms are used in a special sense or if their meaning may not be clear to the user. If many terms must be defined, a glossary of terms should be included as an appendix to the chapter. The section is subdivided and paragraphed as follows:

04.01 The term that is first (either in importance or alphabetically).

This term and the others that follow are defined according to their context in the chapter. **The heading may be underlined to stand out from the body text; place a period (not underlined) after this heading.**

04.02 The term that is second.

Xxx xxx xxxx xxxxxxxx xxxxxx xxxxx x xxxxxxxxxx x xxxxxx xx xx xxxxxxx xxxxxx xx xxx  
xxxxxxx xxxx.

## 0000-05 RESPONSIBILITIES AND AUTHORITIES

Sections (04.01, 04.02, etc.) are arranged in descending order of authority.

05.01 Director, [Program Office]

- a. The authorities, if any, reserved by the Director of [Program Office].
- b. XXXXXXXXXXXXXXXXXXXXXXXX.

05.02 Manager of Organization

05.03 The responsibilities and authorities of the managers who have primary responsibility for the program.

05.04 XXXXXXXXXXXXXXXXXXXXXXXX.

05.05 Other Responsibilities.

If necessary, a separate section may be used to define responsibilities and authorities common to all the managers of the organizational units involved.

## 0000-06 REQUIREMENTS

Subsequent sections (05.01, 05.02, etc.) are used to define and explain the requirements of the function or program.

06.01 Sections.

Sections are numbered consecutively (06.01, 06.02, etc.) and titles **may be** underlined. Further subdivisions **are** formatted as shown below. IMC **0040 Appendix A details** the correct paragraph **and list settings for Microsoft Word**. -The subdivisions that follow merely illustrate the hierarchy. Section 06.01 is not needed unless there is a section 06.02; an “a” is not needed unless there is a “b”; a “1” is not needed unless there is a “2”. **The exception to this rule is the need for a distinct identifier in relation to baseline inspection requirements as stated in IMC 0040, section 08.02d.**

- a. XXXXXXXX xxxxxx xxxx xxxxxxxxxx x xxxxxxx xxxxxxx xxxx xxxxx xxxxxxx xxxx x xxxxxxx  
x xxx xxx.

1. XXXXXXXXXXX X XXX X XXXXX XXXXXXXXXXXX XXXX XXXXXXXXXXXX XXXXXXXXXXX X XXXXXXX XXXXX  
XXXX XXXX.

(a) XXX XXXXXXX XXXX XXXXXXXXXXX XXXXX XXXXX XXXXXXXXXXX XXXXXXXXXXX XXXXX XXXXXXX XXXX  
XXXXXXXX XXX.

(1) XXX.  
Avoid this level of subordination if possible.

i) XXX.  
Avoid this level of subordination if possible.

0000-07 GUIDANCE

0000-08 REFERENCES

See section 05.04 and exhibit 7 for information.

END

List of Appendices: (if applicable)

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments:

Attachment 1: Revision History for IMC 0000 (mandatory, should be the last attachment listed)

# NRC INSPECTION MANUAL

ABCD

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## INSPECTION MANUAL CHAPTER 0000 APPENDIX X

---

### TITLE

Effective Date: (if necessary)

#### 0000X-01 PURPOSE

To provide certain supplementary material.

#### 0000X-02 BACKGROUND

02.01 An appendix often originated elsewhere. State where it originated and, if it is copyrighted material, that reproduction has been authorized.

02.02 The format and content may have been prescribed by a different organization than the one reproducing the document. However, follow the format of the parent IMC to the greatest extent possible.

02.03 The material is appended to the document because it is needed to meet the requirements of the document.

#### 0000X-03 APPLICABILITY

This section identifies the type of facilities, operations, actions, or population for which the IMC is applicable. The applicability section is optional.

#### 0000X-04 DEFINITIONS

This section provides a definition **and** is only necessary if the term is used in a special sense or the meaning may not be clear to the user.

#### 0000X-05 RESPONSIBILITIES AND AUTHORITIES

This section provides a brief description of ownerships arranged from higher to lower levels of authorities.



0000X-06      REQUIREMENTS

This section is used to provide the specific instructions of the IMC Appendix.

0000X-07      GUIDANCE

This section is used to provide specific guidance to this IMC.

0000X-08      REFERENCES

See section 05.04 and exhibit 7 for information.

END

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments:

Attachment 1: Revision History for IMC 0000 Appendix X (mandatory)

[IMC Attachment template: ML22081A396]

# NRC INSPECTION MANUAL

ABCD

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INSPECTION MANUAL CHAPTER 0000 ATTACHMENT #

---

TITLE OF ATTACHMENT

Effective Date: (if necessary)

0000.9-01 PURPOSE

To provide certain supplementary material.

0000.9-02 OBJECTIVES

02.01 A standalone attachment contains additional instructional material to meet the requirements of the parent document.

02.02 An attachment format will follow the parent document format as much as possible and will be depicted by a number (1, 2, 3, etc.) in the title.

0000.9-03 APPLICABILITY (If different from the parent IMC)

0000.9-04 DEFINITIONS (if different from the parent IMC)

0000.9-05 RESPONSIBILITIES AND AUTHORITIES (if different from the parent IMC)

0000.9-06 REQUIREMENTS

This section is used to provide the specific instructions for an IMC Attachment.

0000.9-07 GUIDANCE

0000.9-08 REFERENCES

See section 05.04 and exhibit 7 for information.

END

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments:

**Attachment 1:** Revision History for IMC 0000 attachment (mandatory)

[IP template: ML22081A398]

# NRC INSPECTION MANUAL

ABCD

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INSPECTION PROCEDURE 00000

---

## PROCEDURE TITLE

Effective Date: (primarily either January 1 or July 1)

PROGRAM APPLICABILITY: IMC 2515 A, IMC 2600 B (example)

### 00000-01 INSPECTION OBJECTIVE(S)

This section is used to briefly state the objective(s) of the inspection procedure. If necessary, the section may be subdivided as follows:

01.01 Statement of Objective. Subdivisions of inspection objectives often contain statements without separate headings.

XXXXXXXXXXXX xxx xxxxxxxxxxxxxxx xxxxxx xxxxxxxxxxx xxxxxxx xxx xxxxxx xxxxxxxxxxx xxxxxxx  
xxxx xxxxxx xxxxxx xxxxxxx xxxxxxxxxx xxx xxxxx.

01.02 Xxxx x xxx x xxxxx . Other statements follow, until all objectives have been stated.

### 00000-02 INSPECTION REQUIREMENTS

This section defines inspection requirements necessary to meet the objectives stated in section 01 of the procedure. Requirements stated here are to be met by the inspector in carrying out the inspection. They are not requirements for licensees, although they may reference regulatory requirements, regulatory guides, and industry codes and standards.

The inspection requirements may be written in various ways but must focus on achieving the inspection objectives. The usual approach is to specify systems, components, facility areas, and records to be examined by the inspector; licensee operations and activities to be observed and evaluated; and measurements or other actions to be taken.

The inspection requirements should not involve excessive document review. Some auditing of documents may be necessary, but the emphasis should be on inspecting equipment and observing licensee activities.

Terminology must be consistent. Do not use two or more words for the same idea, concept, or activity. Except for abbreviations in common use, show the complete word, title, or phrase the first time it is used with the abbreviation in parenthesis immediately after, for example, service water system operational performance inspection (SWSOPI).

Clearly indicate what is mandatory for inspectors and what is discretionary. (See sections 05.01e and 08.02).

Inspection requirements may also be stated in terms of the standards against which the inspector evaluates the licensee's controls and programs. Standards include regulatory requirements, industry codes and standards, and accepted safety practices for the activity or subject area covered by the inspection procedure.

As appropriate, the requirements specify the sample size for the inspection activity, such as the number of a given type of record to be examined, and the method of inspection, such as observation, record review, and discussions with plant personnel. The section may be subdivided into two or more subdivisions:

#### 02.01 A Requirement

This section begins with a heading that defines the subject of the requirements. Succeeding sections are numbered sequentially 02.02, 02.03, etc.

- a. Further Subdivisions. The subdivisions that follow merely illustrate the breakdown. An "02.01" is not needed unless there is an "02.02;" an "a" is not needed unless there is a, "b"; and "1" is not needed unless there is a, "2," etc.
- b. The next subdivisions are lettered sequentially, and headings **may be underlined to stand out from content**.
  1. The next level is numbered 1, 2, 3, etc.
    - (a) Avoid further levels if possible.
      - (1) This is the lowest level.

#### 02.02 Numbering.

Each inspection requirement has a specific number or letter (unless there is only one inspection requirement). This is indispensable for identification purposes in section 03, "Inspection Guidance." **Baseline inspection requirements should be in list format (numbered or lettered)**.

#### 02.03 Baseline Inspection Procedures.

Inspection requirements for cornerstone procedures of the risk-informed baseline inspection program are attached to the procedures. The Inspection Requirements section of a baseline inspection procedure lists the attachments.

02.04 It also contains any inspection requirements that apply to all the attachments to the procedure.

### 00000-03 INSPECTION GUIDANCE

This section provides information to assist the inspector in meeting the inspection requirements. The guidance reflects experience gained in past inspections. It may reference regulatory requirements and guides, industry codes and standards, 10 CFR discussions, and technical

guidance. The guidance may include short quotations from referenced material, but then it must be revised by the originating organization whenever the material quoted is changed.

For baseline inspection program cornerstone procedures, this section contains guidance that applies to all the attachments to the procedure. It should also discuss any performance indicators associated with the cornerstone.

### 03.01 General Guidance

If generic guidance is necessary for the procedure, it shall be unnumbered and entitled "General Guidance." Paragraphs under General Guidance are not numbered.

### 03.02 Specific Guidance

Specific guidance begins with section 03.01. This section is subdivided like section 02 and further subdivisions are numbered and lettered in the same manner. These sections and subdivisions provide guidance for the correspondingly numbered sections and subdivisions of section 02. For example, paragraph 03.01a.2 contains guidance for the inspection requirement in 02.01 a.2. The sections and subdivisions in 03 need not be titled, but if they are, the titles should be identical to the corresponding sections and subdivision titles in section 02. When no specific guidance is given for an inspection requirement, use the phrase, "No inspection guidance."

## 00000-04 RESOURCE ESTIMATE

In this section, the originating organization estimates the average number of onsite inspection hours needed to complete this inspection. Separate estimates should be made for two-, three-, and four-unit sites if inspections there require larger sample sizes. The estimates are for broad resource planning and are not intended as measures for judging the inspector's or region's performance. Actual inspections may require substantially more or less time, depending on the circumstances.

## 00000-05 PROCEDURE COMPLETION

In this section the originating organization estimates the average number of onsite inspection samples needed to complete this inspection. Separate estimates should be made for two-, three-, and four-unit sites if inspections there require larger sample sizes. The estimates are for broad resource planning and are not intended as measures for judging the inspector's or region's performance. Actual inspections may require substantially more or less samples, depending on the circumstances.

## 00000-06 REFERENCES

See section 05.04 and exhibit 7 for information.

10 CFR Part 50, Appendix B, Criterion IX

ANSI N45.2.6, "Qualification of Inspection, Examination and Testing Personnel"

ASME Boiler and Pressure Vessel Code, Sections III and V

Regulatory Guide 1.58, "Qualification of NDE and QC Personnel," September 1980

Society for Nondestructive Testing, Recommended Practice No. SNT-TC-1A and Supplements

END

List of Appendices: (if applicable)

Appendix A Title

Appendix B Title

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments:

Attachment 1: Revision History for IP 00000 (mandatory)



[IP Attachment template: ML22081A399]

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 0000 ATTACHMENT 01

INSPECTION PROCEDURE TITLE  
(which is the inspectable area from IMC 0308 Attachment 02)

Effective Date: (primarily either January 1 or July 1)

PROGRAM APPLICABILITY: IMC 2515 A (example)

CORNERSTONES:            Initiating Events (20 percent) [shift enter for more than one]  
                                 Mitigating Systems (80 percent)

This section identifies the cornerstone or cornerstones of safety to which the inspection applies. If more than one cornerstone within the reactor safety strategic area applies, then the relative importance of the cornerstones in the inspection is given as a percentage.

INSPECTION BASES:        See IMC 0308 Attachment 2

SAMPLE REQUIREMENTS:

Sample Requirements (Non-AP1000 sites)		Minimum Baseline Completion Sample Requirements		Budgeted Range	
Sample Type	Section	Frequency*	Sample Size	Samples	Hours
Sample Name 1	03.01	Annual	1 per site	X - Z	57 +/-5 Or A - C
Sample Name 2	03.02	Annual	2 per site	X - Z	
Sample Name 2	03.03	Annual	2 per site	X - Z	
<b style="color: red;">Sample Requirements (AP1000 ONLY)***</b>					
Sample Name 1	03.01	Annual	1 per site	X - Y	10 +/- 2
Sample Name 3	03.03	Annual	1 per site	X - Z	17 +/- 3

\* Common frequency terms are identified as, "Annual, Biennial, Triennial, and When Required." The program office branch chief in DRO may approve a new frequency term and description or definition based on programmatic need. Requests to change frequency information to existing procedures must be approved by the appropriate program office branch chief.

\*\*An exception may be the following IPs: 71111.08, 71111.15, 71111.20, 71151, and 71152. These procedures may have different sample requirements based on the number of units at a site.

\*\*\*A separate AP1000 section may or may not be needed for clarity and simplicity. Non-applicable sections may be removed from the AP1000 table, or the separate section may be eliminated altogether for common sitewide program baseline IPs.

## 00000.01-01 INSPECTION OBJECTIVE

01.01 Inspection Objective 1

01.02 Inspection Objective 2

## 00000.01-02 GENERAL GUIDANCE

High level guidance such as when it is appropriate to perform the IP, and other general considerations.

The baseline inspection program includes procedure attachments that cover the seven cornerstones of safety, including security, in the reactor oversight process (one reactor safety procedure covers three cornerstones).

The inspection requirements of the baseline inspection program are in separate baseline inspection procedure attachments. These procedure attachments are stand-alone documents that correspond to inspectable areas that have been risk informed and work with performance indicators to provide a minimum level of oversight to maintain power plant safety and security.

### 02.01 Numbering.

Baseline inspection program procedures are numbered with 2-place decimals following the base procedure number (for example, 71111.05). Because the numbers are used for recording inspection effort and compared over the years, the attachment numbers do not change. Therefore, if an attachment is deleted from a procedure, the succeeding attachments are not renumbered to fill the gap.

### 02.02 Sample Sizes.

Baseline inspection procedures must explicitly define the amount of inspection. If necessary, the sample sizes specified in the attachment are adjusted for the number of reactor units at a site to obtain sufficient performance information for multi-unit sites. **Sample sizes may also be adjusted based on the technology type at a multi-unit site.** The sample sizes allow for some deviation (See IMC 2515 for more information).

### 02.03 Problem Identification and Resolution.

A part of each cornerstone inspection procedure is devoted to inspecting how licensees find and fix their problems within that cornerstone. These requirements can be stated in the cornerstone procedure itself, in a separate attachment to the cornerstone procedure, or as requirements in attachments for major inspectable areas as part of routine reviews.

00000.01-03 INSPECTION REQUIREMENTS

03.01 Sample Name 1

**a. Sample 1 Requirement 1**

Specific Guidance:

1. Specific Guidance 1 Requirement 1
2. Specific Guidance 2 Requirement 1

**b. Sample 1 Requirement 2**

Specific Guidance:

1. Specific Guidance 1 Requirement 2
2. Specific Guidance 2 Requirement 2

03.02 Sample Name 2

**a. Sample 2 Requirement 1**

Specific Guidance:

1. Specific Guidance 1 Requirement 1
2. Specific Guidance 2 Requirement 1

**b. Sample 2 Requirement 2**

Specific Guidance:

1. Specific Guidance 1 Requirement 2
2. Specific Guidance 2 Requirement 2

00000.01-04 REFERENCES

See section 05.04 and exhibit 7 for information.

END

List of Appendices (if applicable)

XXXXXXXXXX  
XXXXXXXXXX

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments

Attachment 1: Revision History for IP 00000.01 (mandatory)

E6.6 TEMPORARY INSTRUCTION EXAMPLE

[TI template: ML22081A401]

# NRC INSPECTION MANUAL

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TEMPORARY INSTRUCTION 0000/999 REVISION #

---

TEMPORARY INSTRUCTION TITLE

Effective Date:

**CORNERSTONE:** State which reactor oversight process cornerstone of safety applies to the temporary instruction (TI). This entry on the TI is required only for IMC 2515 programs.

**APPLICABILITY:** This section describes which types of operating nuclear power plants or which specific nuclear facilities are inspected using this TI.

0000/999-01 PURPOSE

Statement(s) about the purpose.

0000/999-02 OBJECTIVE

This section is used to briefly state the aim of the program or function covered by this temporary instruction (e.g., "to verify the installation and operability of a recirculation pump trip on either low water level or high reactor vessel pressure for BWR plants").

01.01 Subdivisions have this format:

- a. XXXXXXXXXXXXXXXXXXXXXXXX.
- b. XXXXXXXXXXXXXXXXXXXXXXXX.
  - 1. If further subdivisions are needed, 1, 2, 3, etc., follow.
  - 2. XXXXXXXXXXXXXXXXXXXXXXXX.
    - (a) This level is rarely needed.
    - (b) XXXXXXXXXXXXXXXX.

01.02 XXXXXXXXXXXXXXXXXXXXXXXX.

0000/999-03 BACKGROUND

This section is used to explain the reason for issuing the temporary instruction.

## 0000/999-04 INSPECTION REQUIREMENTS AND GUIDANCE

Succeeding subdivisions (04.01, 04.02, etc.) are used to define and explain the requirements of the function or program. Numbering and paragraphing are the same as for a manual chapter. See exhibit 6.1, section 06.

## 0000/999-05 REPORTING REQUIREMENTS

Normally, inspection findings are documented in a routine inspection report. Other reporting requirements and nonstandard distribution instructions should be given in this section. If the TI includes an inspection requirement to verify licensee completion of an action (develop procedures, conduct tests, etc.) that was neither imposed on the licensee as a requirement nor committed to by the licensee, the originator must direct the inspector to disregard the inspection requirement for that licensee, document in the inspection report that the licensee is not subject to the requirement, and refer the matter to the program office. When a TI inspection addresses a generic issue, and especially when it closes the issue, the inspection report should so state and give the multi-plant action (MPA) number.

## 0000/999-06 COMPLETION SCHEDULE

This section gives the expected date of completion of the inspection. This date should be reasonable and precede the expiration date.

## 0000/999-07 EXPIRATION

This section states how long this temporary instruction remains in effect. The period is usually 12 months and never longer than 24 months.

## 0000/999-08 CONTACT(S)

This section gives the names and complete phone numbers, including area code or FTS number, of the technical contact and lead project manager, if there is one, for the TI's subject.

## 0000/999-09 STATISTICAL DATA REPORTING

This section identifies the inspection procedure element (IPE) code to which inspection time should be charged. For RITS reporting, time is charged to the TI number. The procedure number and code for charging follow-up inspection after the TI is closed is also identified here.

## 0000/999-10 RESOURCE ESTIMATE

The estimated onsite inspection hours necessary to complete the TI. This section is for broad resource planning and is not intended as a measure for judging the inspector's or region's performance. Actual inspections may require substantially more or less time, depending on the circumstances.

0000/999-11 TRAINING

This section describes the originating organization's arrangements for inspectors to get any specialized training needed to perform inspection requirements in the TI beyond basic training for inspectors (specified in IMC 1245, "Qualification Program for Operating Reactor Programs"). The originating organization coordinates specialized training with the Technical Training Division. Specialized training requirements are stated here.

0000/999-12 REFERENCES

See section 05.04 and exhibit 7 for information.

END

List of Appendices (if applicable)

A. Title

B. Title

List of Exhibits: (if applicable)

List of Tables: (if applicable)

List of Attachments:

Attachment 1: Revision History for TI 0000/999 (mandatory)



E6.7 OPERATOR EXPERIENCE SMART SAMPLE (OpESS) EXAMPLE

[OpESS template: ML22081A400]

## NRC INSPECTION MANUAL

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### OPERATING EXPERIENCE SMART SAMPLE (OPESS) 20XX/01

---

#### OPERATING EXPERIENCE SMART SAMPLE TITLE

CORNERSTONE: TITLE SYSTEM

APPLICABILITY: If applicable

- This voluntary OpESS applies to xxx
- This OpESS supplements sample selection for Inspection Procedures (IP)

OpESS 20xx/01-01 OBJECTIVES

01.01 Provide

01.02 Provide

OPESS 20XX/01-02 BACKGROUND

02.01 Title.

Narrative.

Narrative

02.02 Title.

a. text.

b. text.

1. If further subdivisions are needed, 1, 2, 3, etc., follow.

2. text.

c. This level is rarely needed.

d. text.

02.03 Title.

OPESS 20XX/01-03 INSPECTION GUIDANCE

Narrative.

a. text.

b. text.

1. If further subdivisions are needed, 1, 2, 3, etc., follow.

2. text.

(a) This level is rarely needed.

(b) text.

OPESS 20XX/01-04                      REFERENCES

See section 05.04 and exhibit 7 for information.

OPESS 20XX/01-05                      CONTACTS

For technical support regarding the performance of this OpESS and emergent issues, contact:  
Name (NRR/DRA/AAAA) at 301-415-0000 or email@nrc.gov, or  
Name (NRR/DRO/BBBB) at 301-415-0000 or email@nrc.gov.

END

## Exhibit 7: Example of a Reference List

(may include some of these documents, but not necessarily all)

ASTM Standard D-975, "Standard Specification for Diesel Fuel Oils."

IEEE 622-1979, "Recommended Practice for the Design and Installation of Electric Pipe Heating Systems for Nuclear Power Generating Plants"

IMC 0308 Attachment 2, "Technical Basis for Inspection Program"

IMC 0308 Attachment 3, Appendix A, "Technical Basis for the At-Power Significance Determination Process (SDP)"

IMC 0609 Appendix F, Attachment 1, "Attachment 1: Fire Protection Significance Determination Process Worksheet"

IMC 0611 Exhibit 1, "Standard Reactor Inspection Report Outline"

IMC 2515, "Light-Water Reactor Inspection Program—Operations Phase"

IMC 2600 Appendix A, "Guidance for Conducting Fuel Cycle Inspections"

IP 71111, "Reactor Safety-Initiating Events, Mitigating Systems, Barrier Integrity"

IP 71111.01, "Adverse Weather Protection"

Letter from Eric J. Leeds (NRC) to Joseph E. Pollock (NEI), Subject: "Electric Power Research Institute Final Draft Report XXXXXX, 'Seismic Evaluation Guidance: Augmented Approach for the Resolution Of Fukushima Near-Term Task Force Recommendation 2.1: Seismic,' as an Acceptable Alternative to the March 12, 2012, Information Request for Seismic Reevaluations," dated May 7, 2013 (ADAMS accession No. ML13106A331)

Licensee report to NRC Regional Administrator in response to NRC IE Bulletin 79-24

MD 8.13, "Reactor Oversight Process"

NRC Generic Letter 2006-02, "Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power"

NRC IE Bulletin 79-24, "Frozen Lines"

NRC Incident Response Supplement 2650-2652, "Hurricane / Severe Weather / Natural Phenomenon Event Response"

NRC Regulatory Issue Summary 2000-15, "Recommendations for Ensuring Continued Safe Plant Operation and Minimizing Requests for Enforcement Discretion during Extreme Weather Conditions"

NUREG-1379, "NRC Editorial Style Guide"

Exhibit 8: Example of a Change Notice

(NRR/DRO/IRIB owns and creates the Change Notice document)

# NRC INSPECTION MANUAL

IRIB

---

CHANGE NOTICE 22-00#

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DELETED:

TRANSMITTED:

	<u>Number</u>	<u>Date</u>	<u>Number</u>	<u>Date</u>
1.	IMC 0000	01/01/10	IMC 0000	01/01/22
2.			IP 99999	01/01/22
3.	TI 0000/000	03/02/99		

TRAINING: [Use one of the following statements as appropriate.] No special training is required for any documents issued with this Change Notice.

OR: The following training is required for documents in this Change Notice.

REMARKS: [This section summarizes the documents being issued, revised or deleted. The NRR IM coordinator uses the text from the revision history table, "Description of Change," column to describe the new document, the revisions to an existing document, or, in the case of a document deletion, summarizes the reason for the deletion that was provided on the DIF.]

IMC/IP 0000, "Title," Reason for change from table at end of document.

IMC 0000, "Title," has been revised to ...

IP 99999, "Title," is a new document that has been created to.... Researched commitments for the last 4 years and found....

TI 0000/000, "Title," has been completed and is now deleted from the inspection program. The TI completion report can be found in ADAMS under ML00000A000.

**EDITORIAL REVISIONS FROM PREVIOUS CHANGE NOTICES (As Required):**

DISTRIBUTION:

Standard

Official Use Only (OUO)-Security Related Information.

Please contact: \_\_\_\_\_ Phone: \_\_\_\_\_

END

[Change Notice Template: ML16334A035]

Exhibit 9: Example of 5-Year Review Checklist

5-Year Review Checklist for Inspection Manual Documents

Number and Title of Document: Click or tap here to enter text.

**Administrative Considerations** (click check box to select)

- 1. The Office/Division/Branch names are up to date – including the originating organization.  yes  no
- 2. The references list is present and current.  yes  no
- 3. The references to other documents in the body of the IMC/IP/TI/OpESS are current.  yes  no
- 4. References have been added to the document based on documents issued over the past 5 years.  yes  no
- 5. Hyperlinks are up-to-date and link to ADAMS Accession numbers.  yes  no
- 6. Hyperlinks to internal NRC web pages state that they are non-public.  yes  no
- 7. The format of the IP/IMC is in accordance with IMC 0040 exhibit 6 series and IMC 0040 Appendix A.  yes  no
- 8. The procedure reflects the current agreed upon program owner and the Digital City IP/IMC owner list is up to date.  yes  no
- 9. Program Applicability is current in format "IMC 0000 A".  yes  no
- 10. After reviewing the reasons for change at the end of the procedure, all commitments are still in effect.  yes  no
- 11. All open feedback forms (FBF) have been addressed according to IMC 0801.  yes  no  
List the open FBFs reviewed and list reason why any will not be closed during procedure revision after this review:  
Click or tap here to enter text.

**Technical Considerations**

- 12. Previous changes to the ROP are reflected, as appropriate.  yes  no
- 13. The procedure is consistent with its basis document, if applicable.  yes  no
- 14. The procedure is consistent with new regulations, regulatory guides, license commitments and generic communications.  yes  no
- 15. All ROP self-assessments (IMC 307) in the past five years have been considered.  yes  no
- 16. The procedure reflects annual reviews of the procedure, documented observations for observing and/or participating in inspection procedures, inspection finding trends, and operating experience.  yes  no

**Comments/Suggestions:** (provide clarification for any "no" answers above; indicate whether this document is now a REFERENCE document and why)

Click or tap here to enter text.

Originator/Date	Click or tap here to enter text.	Click or tap to enter a date.
Branch Chief/Date	Click or tap here to enter text.	Click or tap to enter a date.
IMC Coordinator/Date	Click or tap here to enter text.	Click or tap to enter a date.

[5-Year Review Checklist Template (non-public): [ML22077A829](#)]

Attachment 1: Revision History for IMC 0040

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 Number (Pre-Decisional Non-Public Information)
	10/14/88 CN 88-015	Initial issuance.		
	09/17/90 CN 90-010	Is revised to: 1) simplify manual chapter content to make it easier for users to prepare documents, 2) delete obsolete or rarely used instructions and materials, 3) upgrade the exhibits to reflect the current NRC format, and 4) revise the format to include SIMS information for entry of verification completion and inspection report information in the sims database.		
	08/30/91 CN 91-011	Is revised to reflect training requirements that are commensurate with the current inspection program. The revisions are the results of a working group review that consisted of personnel from the Regions, NRR, NMSS, and TTC. Appendix B qualification journals to IMC 0040 is being revised and is not included with this revision. It will be issued at a later date.		
	09/27/95 CN 95-013	Is revised to reflect the preparation of documents using WordPerfect, organization changes that have occurred since 8/91, to require closeout reports for temporary instructions, and to reflect the current policy being used for the issuance of inspection program documents.		

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 Number (Pre-Decisional Non-Public Information)
	08/16/01 CN 01-015	Is revised to make it consistent with the revised Reactor Oversight Process. Major addition is a process for determining if changes to the baseline inspection program are necessary. Other changes are to format the font face to be compatible with the agency computer resources. The requirements of IMC 0045 were also added to the manual chapter.		
	02/21/03 CN 03-006	Is revised to add steps to ensure the ROP Basis Document is updated by inputs from program Document Leads at the time program documents are changed and approved.		
C1 Reference: Davis-Besse Lessons Learned Task Force Item 3.1.2(3) and Problem Identification Form 2005-008	ML040690209 02/02/04 CN 04-003	Is revised to ensure that revisions of inspection procedures do not inadvertently delete inspection requirements that were added as a result of an event or occurrence that had generic applicability.	None	N/A
N/A	ML053210382 11/28/05 CN 05-031	Complete rewrite of document structure, add requirement for revision history page, minor revision to DIF. Completed 4 year historical CN search	None	ML053210329



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 Number (Pre-Decisional Non-Public Information)
N/A	ML063260070 03/05/07 CN 07-008	This document is being revised to update and clarify the processes that will be used to prepare, revise, and issue Manual documents, including processes used by the various NRC offices that conduct inspection.	None	ML070570542
N/A	ML071580744 06/20/07 CN 07-020	This document has been revised to establish deadlines for submission of Manual documents in WordPerfect and MS Word formats; update the Office of New Reactors' document issuing form, pursuant to Feedback Form 0040-1144; and provide greater clarity and incorporate editorial changes in response to Feedback Form 0040-1128. It also serves as a template for a Manual document in MS Word.	None	ML071580749 Closed FBF: 0040-1144 0040-1128
N/A	ML082240426 08/19/08 CN 08-024	The document has been revised to clarify instructions on the use of Microsoft (MS) Word in preparing inspection manual documents, reflect office-related requests to modify document issuing forms, respond to Feedback Forms, and make editorial improvements.	None	ML082240428 Closed FBF: n/a

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N/A	ML082820151 10/29/09 CN 09-025	Relocates program office document issuing forms from IMC 0040 to the NRR Digital City website. Adds a document issuing form for NSIR. Clarifies authorization requirements for documents affecting multiple program offices. Stipulates that no new technical guidance or 10 CFR guidance documents will be issued and that these documents will be relocated in the future to either an IMC, IP or different program for ease of use.	None	ML092170189 Closed FBF: n/a
N/A	ML11053A009 06/02/11 CN 11-009	Improved the process: (1) all documents to have a references section which includes a list of other IPs, IMCs, or TIs that appear in the document (ROPFF 0040- 1354). (2) the document's ML number to be listed on the revision history page. (3) comment resolution summary to be an official non-public record prior to submittal to NRR. (4) For new IPs and TIs, the requirements and guidance sections are to be combined (ROPFF 0040-1645). (5) Clarified organizational responsibilities. (6) Upgraded guidance on MS Word to version 2007. (7) Made editorial improvements.	None	ML11125A085 Closed FBF: 0040-1354 ML11174A197 0040-1645 ML11174A193
N/A	ML11242A062 11/16/11 CN 11-035	Included guidance on the formatting of an Operating Experience Smart Sample. Change coordinated with development of IMC 2523, "NRC Application of Operating Experience."	None	N/A

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N/A	ML12045A397 04/12/12 CN 12-005	Revised to support re-alignment with agency documentation standards.	None	N/A
	ML12345A262 12/10/12 CN 12-028	Revised to support minor edits, address FBF 0040-1769, and add a flowchart.	None	ML12332A148 FBF 0040-1769 ML12332A148
	ML13176A014 08/08/2013 CN 13-016	Revised to change signature authority from DIRS Deputy Director for all change notices to only those changes that are new documents or policy changes, and allow the IPAB/IRIB Branch Chief signature authority for revisions and deletions. Add the links for the DIFs in Exhibit 2, and new guidance for temporary instruction requests.	None	ML12103A174
	ML14147A186 11/20/14 CN 14-028	Revised to provide more clarity for writing new manual chapters, inspection procedures and temporary instructions. Added signature authority for the Division or Deputy Division Director for major and policy changes, as well as issuing a new document. Included verbiage for a "Pilot" IP, which should be included in the "Special and Infrequent" inspections.	None	ML14323A008

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	ML16273A037 12/19/16 CN 16-034	Addressed recommendations from OIG Audit 16-A-12 to include more clear direction when writing or revising IMCs, IPs or TIs. Added verbiage regarding appendices, attachments, exhibits, etc. Added examples of front pages for IMCs, IPs, and TIs, Comment Resolution tables, Regional Comment memos and Change Notices. Updated direction on how to use MS Word 2013.	None	ML16273A035
	ML18003A122 01/15/18 CN 18-001	Editorial revision to include the new version of baseline inspection procedure formatting, based on the IP streamlining effort.	None	N/A

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	ML19352E640 07/23/20 CN 20-034	Revised to change the division name from DIRS to DRO, and ownership from IRIB to IRSB as well as references from IPAB to IRAB, based on division re-alignment. Removed the use of the term i.e., (meaning "that is," or "in other words") as it confused some staff members, and replaced it with "such as," which is used to introduce a list of some examples of a topic, but not all examples of a topic. Cleaned up minor formatting issues and moved ROP periodic review language from IMC 0307 into IMC 0040 as a response to OIG Audit 18-A-13, "Audit of NRC's Special and Infrequently Performed Inspections." This change now connects the periodic review language in non-public OVRST-102 with IMC 0040 for the ROP inspection program and removes the periodic review language in IMC 0307 in its entirety.	N/A	N/A

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	ML22075A385 01/17/23 CN 23-001	<p>All references to MS Word formatting moved to a standalone Appendix A. Revised IMC 0040 MS Word formatting to IMC 0040 App A guidelines. Updated to current NRC Style Guide.</p> <p>Clarified expectations for readability and to incorporate pandemic-led technology and internal procedure changes.</p> <p>Expectation Nos. 1, 3-7, 10, and 14 of the NRC Memorandum titled, "Staff Expectations for Inspection Procedure and Inspection Manual Leads of Reactor Oversight Process Governance Documents," (ML19219A225) August 8, 2019, are included in this revision.</p> <p>Revision of Sample Requirements table to further differentiate AP1000 requirements in IPs. Further defined significant/minor changes to IM documents using Categories.</p> <p>Incorporated OVRST-102 in its entirety. Consolidated multiple instances of instruction. Added/modified references to sections which contain further information.</p> <p>Added standalone 5-year Review instructions and template. Completed 5-year review.</p>	N/A	N/A