
MANUAL CHAPTER 0615

RESEARCH AND TEST REACTOR INSPECTION REPORTS

0615-01 PURPOSE

To provide guidance on research and test reactor inspection report content, format, and style.

0615-02 OBJECTIVES

To ensure that inspection reports:

02.01 Clearly communicate significant inspection results to licensees, NRC staff, and the public.

02.02 Provide conclusions about the effectiveness of the programs or activities inspected. The depth and scope of the conclusions should be commensurate with the depth and scope of the inspection.

02.03 Provide a basis for enforcement action in accordance with the NRC Enforcement Policy, NUREG-1600. The NRC Enforcement Manual gives additional guidance, which should be used.

02.04 Assess licensee performance in a periodic, short-term context, and present information in a manner that will be useful to NRC management in developing longer-term, broad assessments of licensee performance (e.g., quarterly facility performance reviews).

0615-03 DEFINITIONS

03.01 Apparent violation: A potential noncompliance with a regulatory requirement regardless of possible significance or severity level, that has not yet been formally dispositioned by the NRC.

03.02 Certificate Holder: An entity responsible for meeting certain NRC requirements defined in an NRC-issued Certificate of Compliance (e.g., 10 CFR Part 71 or Part 72).

03.03 Closed Item: A matter previously reported, as a noncompliance, an inspection finding, a licensee event report, an unresolved item, an inspection follow-up item, or a Part

21 report, which the inspector concludes has been satisfactorily resolved, based on information obtained during the current inspection.

03.04 Conclusion: As used in this chapter, an assessment that relates one or more findings to the broader context of a licensee program functional area.

03.05 Deviation: A licensee's failure to satisfy a regulatory commitment. NOTE: This is different from the term "deviation" in 10 CFR Part 21 (i.e., "a departure from the technical requirements included in a procurement document").

03.06 Escalated Enforcement Action: A Notice of Violation or civil penalty for any Severity Level I, II, or III violation (or problem), or an order based on a violation.

03.07 Finding: As used in this document, an observation that has been placed in context and assessed for significance. For example, a safety issue of concern that is related to a licensee performance, which may or may not be related to regulatory requirements and, therefore, may or may not be related to a violation.

03.08 Inspection: The examination and assessment of any licensee NRC-regulated activity to determine its effectiveness, to ensure safety, and/or to determine compliance. A single inspection report may encompass in-office document review, and/or one or more visits by inspectors; however, a single report is normally limited to a specific period of inspection (e.g., a 1-week period).

03.09 Inspection Follow-Up Item: A matter that requires further inspection because of a potential problem, because specific licensee or NRC action is pending, or because additional information is needed that was not available at the time of the inspection.

03.10 Issue: A well-defined observation or collection of observations that is of concern and may or may not result in a finding.

03.11 Licensee: The applicant for or the holder of an NRC license, construction permit, or combined license. NOTE: In general, the provisions listed as applicable to "licensees" in this chapter are also applicable to vendors and certificate holders.

03.12 Minor Violation: A violation that is less significant than a Severity Level IV violation and not the subject of formal enforcement action. Although minor violations must be corrected, they are not usually described in inspection reports or inspection records.

03.13 Non-Cited Violation (NCV): A method to address a Severity Level IV violation. Provided applicable criteria in the NRC's Enforcement Policy are met, such findings are documented as violations, but are not cited in notices of violation.

03.14 Noncompliance: A violation (regardless of whether it is cited or not), nonconformance, or deviation.

03.15 Nonconformance: A vendor's or certificate holder's failure to meet a contract requirement related to NRC activities (e.g., 10 CFR Parts 71 or 72), where the NRC has not placed the requirement directly on the vendor or certificate holder.

03.16 Notice of Violation (NOV): A formal written citation in accordance with 10 CFR 2.201 that sets forth one or more violations of a legally binding regulatory requirement.

03.17 Observation: A factual detail noted during an inspection.

03.18 Open Item: A matter that requires further inspection. The reason for requiring further inspection may be that the matter has been identified as a noncompliance, unresolved item, inspection follow-up item, licensee event report, or Part 21 report.

03.19 Potentially Generic Issue: An inspection finding that may have implications for other licensees, certificate holders, and vendors whose facilities or activities are of the same or similar manufacture or style.

03.20 Regulatory Commitment: An explicit statement to take a specific action, agreed to or volunteered by a licensee, where the statement has been submitted in writing on the docket to the NRC (e.g., a commitment as formalized in a Confirmatory Action Letter, or a commitment to conform to the provisions of applicable codes, standards, guides, or accepted industry practices when the commitment, code, standard, guide, or practice involved has not been made a requirement by the Commission).

03.21 Requirement: A legally binding obligation such as a statute, regulation, license condition, technical specification, or order.

03.22 Unresolved Item: An issue about which more information is required to determine if it is acceptable, if it is a finding, or if it constitutes a deviation, nonconformance or violation. Such a matter may require additional information from the licensee or cannot be resolved without additional guidance or clarification/interpretation of the existing guidance.

03.23 Vendor: A supplier of products or services to be used in an NRC-licensed facility or activity. In some cases, the vendor may be an NRC or Agreement State licensee (e.g., nuclear fuel fabricator, radioactive waste broker) or the vendor's product may be required to have an NRC Certificate of Compliance (e.g., certain transport packages such as waste casks or radiography devices).

03.24 Violation: The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification.

0615-04 RESPONSIBILITIES

04.01 General Responsibilities. Each inspection of a research or test reactor facility shall be documented in a report as described in this document.

04.02 Division Director. The applicable Division Director is responsible for providing guidance for situations not covered in this manual chapter.

04.03 Research and Test Reactor Section Chief

- a. The Research and Test Reactor Section Chief or designate familiar with NRC requirements in the inspected area shall review each inspection report to ensure that the report follows the guidance given in this document.
- b. The Research and Test Reactor Section Chief or designate shall use applicable internal NRC procedures to provide a record of inspectors' and reviewers' concurrences. The procedures should include how to ensure continued inspector concurrence when substantive changes are made to the report as originally submitted, and how to treat disagreements that occur during the review process (e.g., differing professional views).
- c. The Research and Test Reactor Section Chief or designate is responsible for issuing the report to the licensee.
- d. The Research and Test Reactor Section Chief or designate is responsible for providing interpretations of the information contained in this document and for answering questions related to the guidance.

04.04 Inspectors

- a. Each inspector is responsible to prepare research and test reactor inspection reports in accordance with the guidance provided in this document, including report timeliness. General and specific responsibilities are listed below.
- b. Each inspector is responsible for ensuring that the inspection report is accurate, and that referenced material is correctly characterized. Advice and recommendations are not to be included in inspection reports.
- c. Each inspector is responsible for ensuring that the scope and depth of conclusions are logically drawn and adequately supported by documented observations and findings.
- d. Each inspector is responsible to ensure that the observations, findings, and conclusions are consistent with NRC policies and requirements. For example, enforcement-related findings are addressed in accordance with the NRC Enforcement Policy and the NRC Enforcement Manual.
- e. Each inspector is responsible for ensuring that the content, tone and focus of the inspection report, as issued, is consistent with the content and tone of the exit meeting presentation or that the licensee is appropriately informed of changes after the exit meeting.

Inspectors may use previously issued research and test reactor inspection reports for examples and guidance.

05.01 Cover Letter. Inspection reports are transmitted using a cover letter from the applicable NRC official in accordance with the NRR Office Letter on signature authority. The letter is sent to the designated licensee contact. Cover letter content varies somewhat depending on whether or not the inspection identified a noncompliance. In general, however, every cover letter uses the same basic structure. NOTE: Management Directive (MD) 3.57, "Correspondence Management," Part III provides guidance for NRC letters, including inspection report cover letters. In addition, the NRC Enforcement Manual provides standard transmittal letter formats for inspections in which any noncompliance is identified. The subject line of the letter should state the type of inspection report (e.g., NRC ROUTINE INSPECTION REPORT) followed by the report number.

05.02 Cover Page. The report cover page provides a quick glance summary of information about the inspection.

05.03 Executive Summary. The summary should be informative but concise. An ideal inspection report summary will be useful as an overview tool for licensee management and for NRC management. The summary should begin with a one or two sentence introduction that covers the type of inspection, the scope (i.e., the licensee programs or functional areas inspected), a summary of the overall regulatory conclusion on facility safety and compliance, and a list of the conclusions from the report details.

05.04 Table of Contents. For reports of significant length (i.e., in which the report details section exceeds 20 pages), the inspector should consider including a table of contents as an aid to clarity.

05.05 Report Details. The inspection report should be written with a corresponding level of technical detail, so that it will be understood by a knowledgeable individual conversant with nuclear technology, but who may not be an expert in the specific area inspected. The basic details need only be presented once. Cross references should be made in other sections as appropriate.

- a. Research and test reactor inspection reports should begin with a "Summary of Facility Status" section that briefly describes any shut downs or significant changes in power.
- b. The next section(s) of the report details should be topically arranged in accordance with the inspection procedure specified in Manual Chapter 2545. Each area inspected will include the scope, observations and findings, and conclusions.
 1. Inspection Scope. Concisely describe the inspection scope including the inspection procedure used. Do not repeat any portion of the Scope in the Observations and Findings section. The scope should include the following:

Identify how the inspection was conducted (i.e., the methods of inspection). Methods can include walk-downs, an in-office review, observation of test from the control room, discussion with specific personnel, procedure review, or observation of training or an exercise.

Identify what was inspected. A tabular format is frequently the most clear; the inspector can use this format to list systems, trains or components inspected, specific work activities or evolutions that were monitored, reviewed procedures or records with revision numbers or dates, event reports, etc. When the inspector is present during a significant facility event or an unusual evolution, more detail may be appropriate concerning which portions of the event or evolution were actually observed. For inspections of significant facility modifications, strong emphasis is generally given to quality verification of newly installed or re-worked components or systems. In such cases, the description of inspection activities should be very detailed about what the inspector actually examined (e.g., a listing of welds observed or radiographs reviewed).

Identify the inspection objectives and the criteria used to determine whether the licensee is in compliance. Sources of objectives and criteria include the License, Technical Specifications, and required programs and plans (e.g., the radiation protection plan, the security plan, the emergency plan, and the operator re-qualification plan). Other possible sources include the licensee's commitments.

If the inspection activities were conducted at a location other than the facility, (e.g., an evaluation of emergency or security services), then identify where the inspection took place.

2. Observations and Findings. This section should be used to present, in a narrative format, the inspection results. Within each category, present the observations and findings beginning with the most significant.
 - (a) Observations are the facts an inspector gathers--through watching work activities, examining equipment, interviewing licensee employees, reviewing records, and other inspection methods. When documenting an observation, the inspector will use language that clearly identifies how the observation was discovered and verified. Factual information, which is relevant to an observation, will be documented (e.g., the date and time of discovery, the type, size, manufacturer or model of the equipment, facility-specific design feature, relevant procedures and documents, and chronology of the event including the length of time the condition existed). The facts will be presented in sufficient detail to allow understanding of the characteristics and significance of the inspection findings.

Whenever possible, an observation should be related to a requirement or commitment. Often this context is achieved by direct numerical comparison. For example, comparison to a technical specification required value. Some observations will be qualitative (e.g., reference to an required licensee

procedure). Whether the observation is or is not covered by regulatory requirements, the inspector must clearly state the safety significance (further guidance on the level of safety significance to document is provided below). In such a case, the inspector should use inspection procedures and discussions with NRC and licensee management to arrive at a clear statement of safety significance. Detail must be adequate to support the findings and subsequent conclusion.

- (b) Findings are an assessment of the significance and context of the observations. Inspection reports will clearly relate (1) how the finding relates to the observation(s), (2) whether the finding is neutral, positive or negative, and (3) how significant the finding is.

Fully assessing and documenting the significance of an observation as a finding requires consideration of what are the safety and regulatory impacts. This process involves considering the following questions: What was the actual or potential safety significance? What is safety or regulatory impact with regard to equipment, system or human performance? Who was involved in the issue? Are there programmatic implications? What were the root causes? Has this occurred before? Is a trend or pattern developing? Who found the problem? Should it have been found by the licensee sooner? What was done to correct it? Were those corrective actions prompt and thorough? How does the licensee characterize the significance of this matter? Are there potentially generic issues? The inspection report needs not always answer each of these questions, and need not exhaustively provide every supporting detail for every observation. The inspector will include those details and analyses that contribute to understanding the significance of the finding. The level of detail should reflect the actual or potential safety consequence associated with a finding. The level of detail must provide the decision logic used to arrive at the final conclusion. Include a description of any licensee performance that exasperated or mitigated the issue and influenced the significance of the finding.

In determining the significance of negative findings, the following questions should be used to determine whether or not a finding should be documented in the inspection report: Has this finding shown any actual impact (or any significant potential for impact) on safety? Is this finding illustrative of a programmatic licensee problem, which could have a safety or regulatory impact (e.g., multiple examples of the problem, a related series of failures, an underlying training deficiency, inadequate management oversight, or diverse effects resulting from the same root causes)? Had the licensee previously documented the problem in a corrective action program and not taken effective corrective action? Should the licensee have identified the problem through an NRC required program, evaluation, or audit? Is this finding a possible precursor to a significant event? If the licensee takes no action on this matter, will the condition worsen (i.e., will the safety significance increase)? If this finding recurs, will its recurrence

result in more significant or additional safety concerns? Will this information be useful in assessing the long-term performance of this licensee program or functional area? Does this finding have potentially generic issues? If the answer to any one of these questions is "yes," the finding should be documented in the inspection report. In this case, the documentation should clearly relate the regulatory and safety significance. If the answer to all questions is "no," the finding normally should not be documented.

In determining the significance of positive findings or for licensee improvements, similar thresholds of significance should apply. The inspector should ask questions similar to the following: Has this licensee improvement had an actual positive impact on safety? Has the licensee's efforts to effect change in this area resulted in programmatic improvements to safety or regulatory performance? Has this upgrade resulted in improved equipment or system reliability or improved human performance? Has this information provided useful equipment, system, or human performance insights? Has this licensee action significantly reduced the probability of a particular event? Will this information be useful in assessing the long-term performance of this licensee program or functional area? Does this finding have potential generic issues? If the answer to any one of these questions is "yes," the finding should be documented in the inspection report. If the answer to all questions is "no," the finding normally should not be documented. NOTE: Inspectors should use care in giving credit or making strong positive statements for a proposed licensee action that has not yet been implemented or is in early stages of implementation.

As a general rule, "neutral" assessments should be described in less detail than positive or negative findings. Sufficient detail may be given simply by concluding that the licensee's program met certain expected criteria. That is, if no safety significance or noncompliance issues were identified, then all that is needed is a succinct characterization of the activities observed, and any supportable finding on program adequacy.

Guidance on enforcement-related findings, with regard to significance and supporting details to be documented, is provided in the Enforcement Policy and Enforcement Manual. The documentation for any described violation or deviation must include sufficient information to support the conclusion that the finding is more than minor and is a violation of regulatory requirements. At a minimum the inspection report will address the following questions: What requirement was violated? How the violation occurred? When the violation occurred and how long it existed? When the violation was identified? Are there any actual or potential safety consequence? What are the root cause(s) or apparent root cause(s) at the time of report writing (if identified)? What corrective actions have been taken or planned?

Apparent violations that are associated with potential escalated enforcement actions should also address the following if available at the time of documentation: What is the significance attributed to the finding by the

licensee? If the significance is different than that determined by the NRC, then describe the assumptions used by the licensee, and identify what the licensee considered applicable to its determination that the NRC did not. What is the licensee's position on the NRC's determination that a requirement has been violated? If appropriate, what are the licensee's compensatory measures, which are in place while the licensee's implementing its long-term corrective measures?

CAUTION: Do not make direct statements regarding safety significance in the inspection report when the Agency has not yet reached a conclusion in accordance with the Enforcement Policy and Enforcement Manual.

Inspection follow-up items (IFIs) are issues, which merit additional inspection. IFIs include unresolved items, violations, non-cited violations, and deviations. IFIs should only be initiated for issues that, if substantiated, would clearly rise above the thresholds of significance to be documented as discussed above, and for issues when some specific licensee action is pending, or when needed information is not available at the time of the inspection. When the inspector finds that the additional information may reveal the issue to be a matter of noncompliance, an unresolved item should be initiated. A potential issue or noncompliance should not be identified as unresolved if it likely results in a minor violation. For an unresolved item, the report should identify the actions or additional research needed to resolve the issue. The NRC Enforcement Manual also provides additional guidance on tracking and following up issues of noncompliance. NCVs will normally be opened and closed in the initiating inspection report. The issue description should provide enough background information that a different inspector, using that information, would be equipped to perform the follow-up inspection.

The inspector should make every effort to understand and fairly characterize the licensee's perspective. The inspector's assessment of a finding's significance should be validated through discussion with other NRC research and test reactor personnel and NRC management.

3. Conclusions are general statements of assessment that relate one or more findings to the broader context of the licensee program or functional area inspected. The scope of the conclusions must match what the inspection findings will support. In essence, the conclusion should be compiled by scanning each report section and writing a crisp, short summary sentence for each issue of note--noncompliance or significant findings. As a minimum, the conclusion should include a general assessment statement on the acceptability of each program area in which significant inspection was performed. Conclusions should focus on the capability of the program or activity to accomplish its design basis function. In assessing this capability, the conclusion statements may take various forms, but they should in all cases be concrete and supportable.

Unresolved items and inspection follow-up items (i.e., where more information is needed to reach a finding or conclusion) should not be discussed in the conclusion. NCVs need not be discussed.

The inspection observations and findings must be sufficient to substantiate the conclusion. A broad negative conclusion should be based on specific findings of unsafe practices, ineffective programs or activities, operator or supervisory oversights, significant procedural inadequacies, etc. When negative findings are included in the conclusion, concisely state the root cause(s) (if the root cause(s) have been determined). Conversely, a broad positive conclusion should be supported by findings of sustained safe performance, innovations to improve safety and reliability, efficient execution of complex tasks, programmatic upgrades that improve safety or correct previous issues, etc. Frequently, the findings in a given program area will be mixed (positive and negative), or the limited scope of inspection in a particular area will only support a correspondingly limited conclusion. In such cases, the inspector should neither "force-fit" a broad conclusion nor restrict the conclusion scope to a simple restatement of the findings. Where applicable, the conclusion should account for both negative and positive findings.

For inspections of hardware components or systems, conclusions should seek to answer questions such as the following: Is the component or system capable of performing the safety functions required by either its design or licensing basis? Is maintenance and post-maintenance testing adequate to demonstrate that the component or system would perform all of the safety functions required? Is training adequate to ensure proper operation and maintenance of the component or system? Are control functions effective and reliable? Are human factors considerations relating to the component or system (e.g., accessibility and labeling of components) adequate to ensure proper system operation? Are system procedures adequate to ensure proper system operation under normal and accident conditions? Additional, similar questions may be developed based on the applicable inspection procedure.

Conclusions can also document improving or declining performance in the particular area inspected. Violations, deviations, issues or findings may indicate a trend in licensee performance. Since the NRC inspection program only samples a portion of licensee activities, inspectors should be careful in making statements about a perceived trend, to ensure: (1) that the focus of the statement is accurate in scope (i.e., not overly broad) and is based on an adequate sample of observations; (2) that a perceived improvement or decline does not simply reflect a lack of earlier observation in the area of focus; and (3) that the comparison of past and present performance involves the same specific licensee program area. The conclusion statements should note any noncompliance described in that section of the report.

NOTE: In reaching a conclusion, the inspector sometimes considers and integrates related information from a previous inspection report. In such a case,

the inspector should briefly summarize the previous inspection information or reference the previous inspection report.

c. Inspector Follow-up Item(s). This section should include:

1. The IFI number.
2. Next to the number whether the item will remain open or closed.
3. Brief description of the issue. Include a reference to the regulatory criteria, root cause(s), licensee's corrective action(s). NOTE: A statement of regulatory criteria or root cause(s), need not be included for less significant issues or when the follow-up results are routine and straightforward.
4. Brief description of the actions the inspector took to verify resolution of the issue.

The level of detail devoted to closing open items depends on the nature and significance of the additional information identified. For example, in closing out a violation, if the licensee's "Response to a Notice of Violation" already has given an accurate description of the root cause, corrective actions taken, and other aspects, and the inspector identifies no other instances of the violation, the close-out description should be correspondingly brief. The closure of an unresolved item or IFI should, at a minimum, summarize the topic, summarize the inspector's follow-up actions, evaluate the adequacy of the licensee's corrective actions, determine if a violation has occurred, and include enough detail to justify the inspector's conclusion. NOTE: An inspection follow-up item may be closed simply by administrative action, when NRC management decides not to expend the effort originally envisioned when the IFI was opened.

d. Exit Meeting Summary. This summary normally should include the following elements:

1. If the licensee disagrees with an inspection finding, this position may be characterized by the licensee in their formal response to the inspection report, if applicable. Generally, this section should only confirm that the licensee acknowledges their understanding of the findings and conclusions. Specific items discussed elsewhere in the report should not be described in this section in detail.
2. At the exit meeting, the inspectors should verify whether or not the licensee considers any materials provided to or reviewed by the inspectors to be proprietary. If the licensee did not identify any material as proprietary, include a sentence to that effect. If the report includes proprietary material discuss control with NRC management. NOTE: When an inspection is likely to involve proprietary information (i.e., given the technical area or other considerations of inspection scope), handling of proprietary information should be discussed at the entrance meeting.

3. The inspector should briefly discuss any significant contacts between the inspectors and licensee staff or management that occur after the exit meeting (e.g., to discuss new information relevant to an inspection finding). In addition, if the NRC's position on an inspection finding changed significantly after the exit meeting, that change should be discussed with the licensee before the report is issued.
4. Do not attempt to characterize or interpret any oral statements the licensee makes, at the exit meeting or at any other time during the inspection, as a commitment. Oral statements made or endorsed by a member of licensee management authorized to make commitments are not regulatory commitments unless they are documented as such by the licensee. Licensee commitments are documented by licensee correspondence, after which they may be referenced in the inspection report. Because regulatory commitments are a sensitive area, ensure that any reporting of licensee statements are paraphrased accurately, and contain appropriate reference to the licensee's document.

e. Report Attachments

1. Partial List of Persons Contacted. List by name and title, those individuals who furnished relevant information or were key points of contact during the inspection (except in cases where there is a need to protect the identity of an individual). The list should not be exhaustive but should identify those individuals who provided information related to developing and understanding findings. The alphabetized list includes the most senior licensee manager present at the exit meeting and NRC technical personnel who were involved in the inspection if they are not listed as inspectors on the cover page.
2. List of Inspection Procedures Used. The report should list, by procedure number and title, the inspection procedures used. In some cases, the inspector may wish to include other significant activities inspected (e.g., TIs completed).
3. List of Items Opened, Closed, and Discussed. The report should provide a quick-reference list of items opened and closed, including the item number, the IFS code for the item, and a brief phrase (10 words or less) describing the item. Open items that were discussed (but not closed) should also be included in this list.
4. List of Acronyms. Reports of significant length (i.e., in which the report details section exceeds 10 pages) should generally include a list of acronyms as an attachment.

0615-06 INSPECTION REPORT ADMINISTRATION

06.01 Inspection Report Numbers. Office Instruction No.: OVRST 101, "Procedures for Tracking Inspection Reports for Inspections Conducted by NRR Headquarters Staff," provides guidance on obtaining and using inspection report numbers.

06.02 Report Timeliness.

- a. Timeliness. Routine inspection reports should be issued no later than 45 calendar days after inspection completion. Reactive inspection reports should be issued no later than 30 calendar days after inspection completion. Inspection completion is the day of the exit meeting. Timeliness goals should be accelerated for inspection reports covering potential escalated enforcement actions. For specific enforcement timeliness goals, see the NRC Enforcement Manual.
- b. Significant or Immediate Health and Safety Issue. Whenever an inspector identifies an issue involving significant or immediate public health and safety concerns, the first priority is facility and public safety; issues of documentation or enforcement action are secondary. Based on the circumstances of the case, an expedited inspection report may be prepared that is limited in scope to the issue, or expedited enforcement action may be taken before the inspection report is issued. The NRC Enforcement Manual provides additional guidance on matters of immediate public health and safety concern.

06.03 IFI tracking and numbering. IFIs will be tracked by the originating or assigned inspector. Each IFI will be numbered in the inspection report. The number will consist of three letter designation for the type of item (e.g., violation (VIO), non-cited violation (NCV), deviation (DEV), unresolved item (URI), or other findings that merit follow-up (IFI)), followed by the docket number, a "/", the inspection report number, a "-", and a sequence number (e.g., VIO 05000999/2004-001-01). The sequence number will start with 01 at the beginning of the report for the first item identified. Each new item identified on subsequent pages will be numbered in sequence, regardless of type. In a report covering only one facility, each item will be tracked separately. Items common to two or more facilities will have the same sequence number for each unit; the docket number and the associated inspection report number will distinguish the unit to which the open item applies. When an inspection involves multiple violations (or multiple examples of a single violation), there must be an one-to-one correlation between the number of the IFI and the number of "contrary to" statements in the accompanying notice of violation.

0615-07 GUIDANCE - INSPECTION REPORT STYLE

07.01 The NRC Enforcement Manual provides specific guidance and boilerplate for writing associated with enforcement actions.

07.02 The U.S. Government Printing Office (GPO) Style Manual is a reference on government writing style, covering a range of topics from capitalization to compound words.

07.03 NUREG-1379, the NRC Style Guide, establishes specific guidance for the agency on the use of abbreviations, capitalization, punctuation, in-text references, and so forth. The NRC Style Guide is consistent with the GPO Style Manual on most matters.

07.04 The narrative sections of a report should be written in the third person, in the past or past perfect tense, in predominately active voice.

- a. Grammatical Person, Tense, and Voice. Always write in the third person. For example, "The inspector watched the operator startup the reactor."

In general, use the past or past perfect tense. For example, "The facility director stated that the safety review committee met quarterly." NOTE: As a rule of thumb, use the past tense (e.g., "the pump cavitated ..." OR "the pump was cavitating ...") when writing about events that occurred during the inspection. Use the past perfect tense (e.g., "the pump had cavitated ..." OR "the pump had been cavitating ...") when writing about events that occurred before the inspection. EXCEPTION: When quoting or paraphrasing existing documents, the present tense may be used (e.g., "10 CFR 50.71 states ..."). When quoting a licensee document, give the date and/or revision number of the document from which the quote was taken).

Use predominately active voice (subject-verb-object). For example, "The operator reported that pool water level was rising." The inspection report should clearly identify the subject, or the performer of the action, which could be important in evaluating the significance of the observation.

- b. Words or Phrases with Unspecific Connotations or Hidden Implications. Avoid words or phrases that have unspecific connotations or hidden implications, such that a reader might misconstrue the meaning. Avoid words and phrases which are imprecise, e.g., wonderful or awful. These words and others are imprecise and unsupported. A more concrete description, detailing those aspects and attributes of the finding are more appropriate. For example, a program exceeded or failed to meet requirements or standards on timeliness. "Willful," and "deliberate" activities represent agency conclusions with specific NRC Enforcement Policy connotations, and should not be used in a report narrative unless they represent a formal Agency conclusion. For further discussion on willfulness and related topics, refer to the NRC Enforcement Manual.
- c. Technical, Legal, and Local Jargon. Because of the specialized technical and legal aspects of NRC regulation, inspectors must maintain sensitivity to the use of specialized vocabulary in inspection reports. The use of technical and legal jargon is expected and necessary; however, inspectors should avoid the use of "local jargon," terms or phrases that have specific meaning for a particular facility or but are not widely understood. Examples include terms and phrases such as "tailgate" (when used to refer to an informal meeting), "work-around," and "command and control." Because these labels are used routinely by a localized group, inspectors

may become accustomed to their use and assume that they have a consistent, widely understood meaning. To reduce the potential for mis-communication, inspectors should define such terms and phrases whenever used or, if possible, use an alternate word that has a clear, dictionary-defined meaning. For example, consider the following usage of the term "work-around": "The licensee's failure to resolve longstanding concerns has contributed to an excessive reliance on an operator "work-around." The term "work-around," as used in this report, refers to non-routine actions performed by the operating crew to compensate for equipment not functioning as designed." In this case, the inspector chose to use local jargon by including the term "work-around." By defining the term immediately after its initial use in the report, however, the inspector avoided the possibility of vagueness or an incorrect interpretation for a reader not familiar with the term. As an alternative, the inspector may choose not to use the term at all: "The licensee's failure to resolve longstanding concerns has contributed to an excessive reliance on the performance of non-routine actions by the operators, to bypass or compensate for equipment not functioning as designed."

0615-08 RELEASE AND DISCLOSURE OF INSPECTION REPORTS

- a. General Public Disclosure and Exemptions. Except for report enclosures containing exempt information, all final inspection reports will be disclosed routinely to the public. IMC 0620, "Inspection Documents and Records," gives guidance on acquiring and controlling NRC records, including inspection-related documents. Safeguards information or related sensitive information should not be released per current Agency policy. Any questions regarding this policy should be referred to the program office.
- b. Release of Investigation-Related Information. When an inspector accompanies an investigator on an investigation, the inspector must not release either the investigation report or his or her individual input to the investigation report. This information is exempt from disclosure by 10 CFR 9.5, and must not be circulated outside the NRC without specific approval of the Chairman (refer to OI Policy Statement 23).

0615-09 TREATMENT OF THIRD PARTY REVIEWS

Detailed NRC reviews of National Organization of Test, Research and Training Reactor (TRTR) evaluations, reports, findings, recommendations, and corrective actions, or other third party reviews with similar information are not referenced in NRC inspection reports, tracking tools, or other Agency documents unless the issue is of such safety significance that no other reasonable alternative is acceptable. TRTR findings, recommendations and associated licensee corrective actions are not normally tracked by the NRC. If a finding warrants tracking, it should be independently evaluated, documented, and tracked as an NRC finding. Include a short statement in the inspection report to document that a review of a specified TRTR evaluation or report was completed. Do not include a recounting or listing of TRTR findings or reference a final TRTR conclusions when documenting an

TRTR evaluation or accreditation report review. Discuss the specifics of any significant differences between NRC and TRTR perceptions with management.

END