

NRC INSPECTION MANUAL

DRO

Change Notice 20-054

DELETED:		TRANSMITTED:	
<u>Number</u>	<u>Date</u>	<u>Number</u>	<u>Date</u>
1. IMC 0611 App C	12/13/17	IMC 0611 App C	10/21/20
2. IMC 2515 App B	12/18/15	IMC 2515 App B	10/21/20
3. IP 95001	08/24/16	IP 95001	10/21/20

TRAINING: No special training is required for any documents issued with this Change Notice.

REMARKS: IMC 0611 Appendix C, "Documenting Supplemental Inspections," is a major revision and has been revised to align with IMC 0040 formatting standards. Added direction to document and track in the Reactor Program Systems (RPS)-Inspections the planned corrective actions to prevent recurrence to allow for efficient follow-up inspection. This addresses OIG-19-A-19 Report Recommendation 1 and part of Recommendation 2 found under ML19256A776, which is a commitment in this IMC. Organizational related content was relocated to the RPS Auto Report Generator and report templates.

IMC 2515 Appendix B, Supplemental Inspection Program," has been revised to This is a major revision. Commitment C1 is established in response to the EDO assessment and decision on pages 8 and 9 of DPO-2018-001 Case File [OUO – Sensitive Internal Information – Limited Distribution (ML19214A199)] to enhance direction regarding supplemental inspections as follows: Highly qualified inspectors are entrusted with the responsibility to inspect to the requirements of the procedure; Inspectors should document their assessment of how the licensee met the inspection's objectives; The inspection report should clearly communicate the outcomes to an independent reader; and the inspection report's conclusions should be explicit regarding additional actions required by the inspectors. Commitment C2 addresses agency actions (ML19325C330) in response to OIG-19-A-19 Audit of the NRC Oversight of Supplemental Inspection Corrective Actions and Agency Response, dated October 10, 2019 (ML19256A776). Commitment C3 addresses migrated IP 95001 content related to Staff Requirements Memorandum, SECY-15-0108 "Recommendation to Revise the Definition of Degraded Cornerstone as used in the Reactor Oversight Process" (ML15335A559) (See commitment C2 in IP 95001). In addition, content that is common to multiple supplemental IPs is being relocated from individual supplemental IPs to this appendix and is referenced as appropriate rather than replicated in those IPs. Finally, this revision brings this appendix into alignment with current IMC 0040 structure requirements.

IP 95001, "Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs," has been revised to address commitment C3, which addresses agency-committed actions (ML19325C330) in response to OIG-19-A-19 Audit of the NRC Oversight of Supplemental Inspection Corrective

Actions and Agency Response, dated October 10, 2019 (ML19256A776). Commitment C4 is established in response to the EDO assessment and decision on pages 8 and 9 of DPO-2018-001 Case File [OUO – Sensitive Internal Information] (ADAMS ML19214A199) to enhance direction regarding supplemental inspections as follows:

- a. Highly qualified inspectors are entrusted with the responsibility to inspect to the requirements of the procedure;
- b. Inspectors should document their assessment of how the licensee met the inspection’s objectives;
- c. The inspection report should clearly communicate the outcomes to an independent reader; and
- d. The inspection report’s conclusions should be explicit regarding additional actions required by the inspectors.

Relocated General Requirements and Guidance common to Supplemental Inspections to IMC 2515 Appendix B “Supplemental Inspection Program” to reduce unnecessary replication. Adjusted resource estimates and enhanced procedure organization and clarity to promote improved implementation efficiency and consistency.

EDITORIAL REVISIONS FROM PREVIOUS CHANGE NOTICES (As Required):

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