

SPECIAL INSPECTION

Effective Date: **Upon Issuance**

PROGRAM APPLICABILITY: IMC's **2200, 2201C, 2202B, 2504C, 2514, 2515C, 2545, 2561, 2600B, 2690, 2800**

93812-01 INSPECTION OBJECTIVE

The inspection objective is to promptly disseminate the facts, conditions, circumstances, and causes of significant events and to identify appropriate follow-up actions.

For reactor sites, a **special inspection** (SI) is the event assessment response assigned by the NRC in accordance with Inspection Manual Chapter (IMC) 0309, "Reactive Inspection Decision Basis for Reactors." The inspection is conducted based on this procedure and an inspection charter.

93812-02 INSPECTION REQUIREMENTS

Note: Management Directive (MD) 8.3, "NRC Incident Investigation Program," defines the authorities, responsibilities, and basic requirements for personnel investigating significant events. MD 8.3 also characterizes the differences between an **augmented inspection team** (AIT), **incident investigation team** (IIT), and SI.

02.01 SI Leader

- a. Acts as the supervisor of the SI.
- b. Reviews charter and supports its development as needed **in consultation with regional administrator (RA) or appropriate office director**.
- c. Forwards information on potentially generic safety questions (such as questions or concerns related to the design or licensing bases) to the **regional operating experience coordinators or the Office of Nuclear Reactor Regulation (NRR), Division of Reactor Oversight (DRO), Operating Experience Branch (IOEB), or both when warranted**.
- d. Conducts an entrance meeting with the licensee to discuss the purpose and scope of the SI response, and to **do the following**:
 1. Obtain the licensee's understanding of the event (including operator actions and the performance of safety systems).
 2. Request licensee assistance in scheduling interviews, obtaining information related to the event, and, if needed, assisting in inspection activities related to the event.

3. As appropriate, discuss investigatory evidence preservation and restoration, such as the quarantining of equipment in the “as found” post-event state for causal analysis and the process to release such equipment for restoration.
- e. During the initial debrief, does the following:
 1. Provides a recommendation to the RA or appropriate office director as to whether the SI should continue or be upgraded to an AIT or IIT response when sufficient information becomes available.
 2. When a preliminary notification (PN) is required, provides input to office and technical staffs so they can prepare and transmit a PN report to the RA for distribution. IMC 1120, “Preliminary Notifications,” has criteria for issuing a written PN.
 - f. As applicable, provides input to the office and technical staffs to prepare supplemental PN reports or daily notes, or both, when there is significant new information to report to keep management informed of significant facts, findings, and progress of the inspection.
 - g. When applicable, coordinates with Office of Public Affairs to provide the news media with information.
 - h. In support of timely and effective inspection, requests additional support and resources to effectively implement the inspection charter authorized by the RA or appropriate office director and in consultation with appropriate internal and external stakeholders.
 - i. Manages the SI effort in fact finding and analysis to meet the objectives of the SI charter. Important information will include the details of what occurred during the event and its causes and contributing factors.
 - j. Conducts an exit meeting with the licensee to do the following:
 1. Summarize the SI inspection effort.
 2. As appropriate, discuss preliminary findings, violations, observations, or issues resulting from the SI.
 - k. Prepares report for the RA documenting the findings of the SI. May direct the SI members to remain together, either at the inspection site or at the regional office, to facilitate the preparation of the SI report.
 - l. Meets with regional management to discuss the SI recommendation(s) for staff follow-up based on the findings of the SI report and assists in coordinating the transfer of responsibility for follow-up actions.
- 02.02 SI Members (as applicable)
- a. Report directly to the SI leader.
 - b. Conduct a timely, thorough, and systematic inspection of significant operational events at facilities licensed by the NRC, under the supervision of the SI leader. In so doing, members shall do the following:

1. Assess the significance of the event under the guidance of the SI leader.
 2. Collect, analyze, and document information and evidence as directed by the SI leader.
 3. Evaluate the adequacy of licensee response to an event under the guidance of the SI leader.
- c. Remain together after the inspection, at the discretion of the SI leader, to prepare the SI report.

93812-03 INSPECTION GUIDANCE

03.01 Scope

The following guidance should not be construed as limiting SI authority to pursue all pertinent aspects of an event. However, safety and security (or regulatory) concerns raised that may or may not be directly related to the event under consideration should be reported to headquarters, regional office management, or both, for appropriate action.

- a. Promptly identify and convey generic safety concerns to the regional management and NRR/DRO/IOEB when appropriate, which will initiate appropriate follow-up actions. Recommendations for immediate follow-up actions, such as issuance of operating experience smart samples, information notices, generic letters, or bulletins, shall also be made through the normal organizational structure and procedures.
- b. Emphasize fact finding, that is, fully understanding the circumstances surrounding an event and probable cause(s), including conditions preceding the event, event chronology, systems response, equipment performance, event precursors; considerations of human factors, quality assurance, radiological exposure, safeguards, and safety culture components (as defined in IMC 0310, "Aspects Within the Cross-Cutting Areas"). [C1] Determine whether the licensee had failed to adequately implement past operating experience, including generic communications such as information notices, generic letters, and bulletins.
- c. Base the fact-finding effort on the most timely, reliable evidential material, including interviews and other documented material related to the event previously obtained by internal audit or investigative groups. Inspectors should consider visiting vendor or contractor facilities, if necessary, to gather additional insights or to verify licensee conclusions that are dependent on information supplied by vendors or contractors. The inspectors should consult with the Quality and Vendor Inspection Branch for additional guidance prior to visiting a vendor or contractor.
- d. It is not the responsibility of an SI to do the following:
 1. Examine the regulatory process during the inspection (to determine whether that process contributed directly to the cause or course of the event). When the regulatory process appears to have contributed directly to the cause or course of the event, the SI should provide feedback to the program office. IMC 0801, "Inspection Program Feedback Process," describes this process.

2. Address licensee actions related to plant restart.
 3. Address the applicability of potential generic safety or security concerns at other facilities.
- e. For a medical event refer to MD 8.10, "NRC Assessment Program for a Medical Event or an Incident Occurring at a Medical Facility," for additional direction.
 - f. For significant radiological events at reactor, fuel cycle, materials, or non-power utilization facilities review IMC 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan," and IMC 1302, "Follow-up Actions and Action Levels for Radiation Exposures Associated with Materials Incidents Involving Members of the Public," for additional guidance.

03.02 Schedule

An SI should begin as soon as practicable after the facility has been placed in a safe, secure, and stable condition.

03.03 Communications

When the chronology and circumstances of the event are more clearly understood, the SI leader is encouraged to maintain communications with cognizant personnel from the regional office, NRR, NMSS, or NSIR, as appropriate, to do the following:

- a. Provide a firsthand update of the event.
- b. Respond to any questions.
- c. Discuss the appropriateness of the SI response.

03.04 Qualifications

The SI Leader should typically be a non-Senior Executive Service manager, qualified team leader, or senior inspector.

03.05 Resources

The resources applied to an SI are based on the agency's understanding of the event, its complexity, the significance attributed to it, and uncertainties and influential assumptions involved in assessing its significance.

03.06 Inspection Team (as applicable)

Technical experts from the responsible regional office are comparable for SIs and AITs, but SIs (unlike AITs) are usually not augmented by personnel from headquarters, other regions, or contractors with special technical qualifications. Incident Response Manual Chapter (IRMC) 300, "Incident Investigation," outlines the procedures for using non-Government individuals.

03.07 Documentation

IMC 0611, Attachment 2, "Guidance for Reactive Inspection Reports," contains specific documentation guidance for SI and AIT inspections.

93812-04 RESOURCE ESTIMATES

The resources required to complete this inspection are highly variable and dependent on the circumstances involved. Therefore, no specific resources estimates are provided.

93812-05 PROCEDURE COMPLETION

This procedure is considered complete when the inspection and charter objectives have been met and the final inspection report has been issued.

93812-06 REFERENCES

MD 8.2, "NRC Incident Response Program"

MD 8.3, "NRC Incident Investigation Program"

MD 8.10, "NRC Assessment Program for a Medical Event or an Incident Occurring at a Medical Facility"

IRMC 300, "Incident Investigation"

IMC 0310, "Aspects Within the Cross-Cutting Areas"

IMC 0309, "Reactive Inspection Decision Basis for Reactors"

IMC 0609, "Significance Determination Process"

IMC 0611 Attachment 2, "Guidance for Reactive Inspection Reports"

IMC 0801, "Inspection Program Feedback Process"

IMC 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan"

IMC 1302, "Follow-up Actions and Action Levels for Radiation Exposures Associated with Materials Incidents Involving Members of the Public"

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

IMC 2601, "Reactive Inspection Decision Making Process for Fuel Facilities"

IP 93800, "Augmented Inspection Team"

END

Attachment 1: Revision History for Inspection Procedure 93812

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	04/03/00 CN 00-003	IP 93812 is modified to be performed as a supplemental procedure (Appendix B).	N/A	N/A
N/A	03/06/01 CN 01-006	IP 93812 has been revised to provide consistency with Management Directive 8.3, and to provide guidance on Preliminary Notifications.	N/A	N/A
N/A	ML023020559 10/23/02 CN 02-039	IP 93812 has been revised to provide guidance on documenting information relating to events that is in addition to that currently required by IMC 0612, "Power Reactor Inspection Reports," such as description/chronology, risk-significance, and probable contributing causes.	N/A	N/A
N/A	ML031990467 07/07/03 CN 03-023	IP 93812 has been revised to reflect the revision to Management Directive 8.3, "NRC Incident Investigation Program," and to delete the prohibition for Special Inspections to review licensee actions related to plant restart.	N/A	N/A
C1	ML061560514 06/22/06 CN 06-015	Incorporate safety culture into inspection procedures. "Staff Requirements - SECY-04-0111 - Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture" August 30, 2004. Revision history reviewed for the last four years.	Yes, no description available. Completed 07/01/06	ML061570136
N/A	ML071920283 07/18/07 CN 07-022	IP 93812 is revised to consider licensee implementation of Information Notices, Generic Letters, and Bulletins.	N/A	N/A

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	ML073390043 01/10/08 CN 08-002	Guidance on feedback form recommendations for improving the SI process based on lessons learned from SIs.	N/A	N/A
N/A	ML081230527 07/25/08 CN 08-020	Guidance for recommending improvements to reactor oversight process baseline inspection procedures based on lessons learned from the SI.	N/A	N/A
N/A	ML083370411 03/23/09 CN 09-010	Evaluate whether the event and its causes indicate gaps in ROP baseline inspection procedures.	N/A	ML090400970
N/A	ML11294A427 11/15/11 CN 11-033	Added guidance related to interviewing vendor or contractor personnel (FF 93012-1465)	N/A	N/A
N/A	ML17306B161 11/15/17 CN 17-025	Amended 02.01.b and 03.02.b text to clarify details of charter. Closed FF 93800-1839. Added clarification that the issuance of the report should not be delayed for SDP processes.	N/A	93800-1839 ML17319A912
	ML18275A423 04/02/19 CN 19-012	Relocated documentation guidance into the new IMC 0611 Attachment 2, "Guidance for Document Reactive Inspections." Addressed numerous minor issues identified in FBF 93812-1772.		ML18331A290 93812-1772 ML18303A202 ML18303A203
N/A	ML21118A075 04/28/21 CN 21-020	Editorial change to add IMC 2504 C, "Construction Inspection Program: Inspection of Construction and Operational Programs," in the Program Applicability list.	N/A	N/A

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)
	ML22102A125 06/07/22 CN 22-012	Revised to include guidance that is being relocated from the handbook for MD 8.3. Specifically, qualifications, scheduling, coordination with Office of Public Affairs, evidence preservation, and equipment quarantine.	None	ML22104A261