

FUEL CYCLE SAFETY AND SAFEGUARDS INSPECTION REPORTS

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INSPECTION REPORTS

0616-01 PURPOSE

To provide guidance on inspection report content, format, and style for fuel cycle inspection reports.

0616-02 OBJECTIVES

To ensure that inspection reports:

02.01 Clearly communicate significant inspection results to licensees, U.S. Nuclear Regulatory Commission (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 (EA).

NOTE: The NRC Enforcement Policy is available in the Agency-Wide Documents Access and Management System (ADAMS) and at the Office of Enforcement (OE) Web site. Publication of the paper copy as NUREG-1600 has been discontinued. The NRC Enforcement Manual which gives specific guidance on addressing noncompliance in inspection reports is also available on the OE Web site.

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 such as Licensee Performance Reviews (LPRs).

0616-03 DEFINITIONS

Apparent Violation. A potential noncompliance with a regulatory requirement, regardless of possible significance or severity level (SL), that has not yet been formally dispositioned by the NRC.

Certificate Holder. An entity responsible for meeting certain NRC requirements defined in an NRC-issued Certificate of Compliance (COC) (e.g., 10 CFR Parts 71 or 72) or by a certificate issued under 10 CFR Part 76. Note that for the purposes of this Inspection Manual Chapter (IMC), the use of the term "licensee" includes that of certificate holder.

Closed Item. A matter previously reported as a noncompliance, an inspector follow-up item (IFI), a licensee event report, or an unresolved item (URI), that the inspector concludes has been satisfactorily addressed based on information obtained during the current inspection.

Conclusion. As used in this IMC, an assessment that relates one or more findings to the broader context of a licensee program.

Deviation. A licensee's failure to satisfy a written commitment, such as 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.

NOTE: For 10 CFR Part 21 and vendor inspections, the term "deviation" generally refers to the definition given in Part 21 (i.e., "a departure from the technical requirements included in a procurement document").

Draft Inspection Report. Any version of the inspection report before its official issuance.

Escalated Enforcement Action. A Notice of Violation (NOV) for any SL I, II, or III violation (or problem); a civil penalty; or order based on a violation.

Inspection. The examination and assessment of any licensee activity regulated by the NRC to determine its effectiveness, to ensure safety, and/or to determine compliance. A single inspection report may encompass resident inspection, in-office document review, and/or one or more visits by Regional or Headquarters inspectors; however, a single report is normally limited to a specific period of inspection.

Inspection Document. Any material obtained or developed during an inspection that is considered to be an NRC record (see below).

Inspector Follow-Up Item (IFI). An IFI is a potential safety or safeguards issue that is not a violation, non-conformance or deviation that requires further inspection because specific licensee action is pending. An IFI should clearly identify the action being taken. An inspector should only open an IFI if further NRC inspection is warranted and the issue was evaluated for safety or safeguards significance and discussed with management. IFIs should be closed after the licensee has completed the necessary actions to address the issue. The inspector who opens an IFI should make every effort to obtain the needed information through either a telephone conference with the licensee following the inspection or by having another inspector review the issue in a subsequent inspection. If the item can be closed out as a result of a telephone conference with the licensee, the inspector should provide a feeder report for inclusion in the next inspection report at the facility (Resident Inspector, Regional or Headquarters inspection).

Inspector-Identified. For the purpose of this IMC, inspector-identified findings are those findings found by NRC inspectors that the licensee had not previously documented either through normal activities or in a problem identification and resolution program or had not been identified by a licensee-sponsored program, evaluation, or audit designed to identify deficiencies.

Integrated Inspection Reports. A fuel facility inspection report that typically combines inputs from all inspections (resident, regional, etc.) conducted within a specific period

prescribed by management. Special inspections or other activities may, on occasion, be reported separately from integrated reports.

Licensee. The holder of an NRC license, construction permit, or combined license. The provisions listed as applicable to “licensees” in this IMC are also applicable to vendors and certificate holders.

Licensee-Identified. See NRC Enforcement Policy.

Minor Violation. See NRC Enforcement Policy.

Non-Cited Violation. See NRC Enforcement Policy.

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

Nonconformance. A vendor’s or CoC holder’s failure to meet a contract requirement related to NRC activities, where the NRC has not placed the requirement directly on the vendor or CoC holder.

Notice of Violation. See NRC Enforcement Policy.

NRC Record. Any written, electronic, or photographic record under legal NRC control that documents the Enforcement Policy or activities of the NRC or an NRC licensee (see also the definition in 10 CFR Part 9).

Observation. A fact; any detail noted during an inspection.

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.

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. This may include a commitment in the licensee’s application that is not a requirement of the license, a response to an NOV, a commitment as part of a performance improvement program, etc.

Requirement. A legally binding obligation such as a statute, regulation, license condition, or Order.

Team Inspection. A multi-disciplinary inspection conducted by three or more inspectors for a specified purpose. Team inspections can be routine inspections of a major licensee, or reactive inspections in response to a particular incident or event. Team inspections do not include those where a supervisor or program office staff member accompanies an inspector to evaluate the inspector’s performance or where one or more inspectors participate in a training status. In this context, team inspections are not meant to cover Augmented

Inspection Teams (AITs) or Incident Investigation Teams (IITs) described in Management Directive (MD) 8.3, "NRC Incident Investigation Program."

Unresolved Item. An issue about which more information is required to determine if it is acceptable or if it constitutes a deviation 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.

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 CoC (e.g., certain transport packages such as spent fuel casks).

Violation. See NRC Enforcement Policy.

Willfulness. See NRC Enforcement Policy.

0616-04 RESPONSIBILITIES

All NRC inspectors assessing fuel cycle licensed activities are required to prepare inspection reports in accordance with the guidance provided in this IMC. General and specific responsibilities are listed below.

04.01 General Responsibilities. Each inspection of a licensee, vendor, and certificate holder shall be documented. The inspection activities which require that inspection results be described in a narrative format are described in Section 05.

04.02 Inspectors.

- a. All NRC fuel cycle inspectors are required to prepare inspection reports in accordance with the guidance provided in this IMC.
- b. Inspectors have the primary responsibility for ensuring that observations and findings are accurately reported, that referenced material is correctly characterized, and that the scope and depth of conclusions are adequately supported by documented observations and findings. Advice and recommendations are not to be included in inspection reports.
- c. Inspectors are responsible for ensuring that the content of the report does not conflict with the information presented at the exit meeting. If the report will differ significantly from the information provided at exit meeting, the inspector (or the report reviewer) should discuss those differences with the licensee before the report is issued.
- d. Report writers and reviewers should ensure that inspection reports follow the general format given in this IMC.

- e. For inspections conducted by regional and resident inspectors, the report numbers should be issued per Regional Instructions and should be consistent with ADAMS templates.
- f. For inspections conducted by the Office of Nuclear Material Safety and Safeguards (NMSS), the report number is in the following form: Docket No./Year (four digits) followed by the sequential number of the report in that year. For example, in February 2006 an inspector from the Fuel Cycle Safety and Safeguards (FCSS) completed an inspection of a licensee (Docket No.07001113). The inspection was the first inspection in calendar year. The inspection report number is 07001113/006-201.

04.03 Branch Chiefs and Division Directors.

- a. Except for inspection findings issued using an NRC Form 591FF (see Appendix C), a manager familiar with NRC requirements in the inspected area shall review each inspection report, prior to issuance, to ensure that the report follows the format given in this IMC.
- b. The inspector's Branch Chief (BC) will sign the cover letter for Form 591FF reports when the completed form is sent from the Region II office.
- c. The management reviewer shall ensure that inspection findings are consistent with NRC policies and technical requirements, that enforcement-related findings are addressed in accordance with the NRC Enforcement Policy and the NRC Enforcement Manual, and that conclusions are logically drawn and sufficiently supported by observations and findings.
- d. Regional and Headquarters managers shall establish internal procedures to provide a record of inspectors' and reviewers' concurrences. The procedures should address 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. As a minimum, substantial changes should be discussed with the inspector or inspectors involved to ensure continued concurrence, and disagreements that cannot be adequately resolved should be documented.
- e. The applicable Division Director (DD) or designated BC is responsible for the report content, tone, conclusions, and overall regulatory focus, and timeliness of narrative inspection reports. Typically, individual reports are issued no later than 30 calendar days after inspection completion or 45 calendar days for team inspections. Inspection completion is normally defined as the day of the exit meeting.
- f. The designated BC is responsible for issuing integrated reports for fuel cycle facilities quarterly. Typically, integrated reports are issued no later than 30 calendar days after inspection completion. For integrated or resident inspection reports, inspection completion is normally defined as the later of the date of the exit

meeting or last day covered by the inspection report. Resident inspection reports normally cover a calendar quarter inspection.

04.04 Program Office. The program office is responsible for providing interpretations of the information contained in this IMC, for answering questions related to the guidance, and for providing guidance for situations not covered in this IMC.

0616-05 GUIDANCE FOR TYPE OF INSPECTION REPORT

This section provides general guidance on the types of inspection reports for fuel facility inspections. Appendix A provides Inspection writing style guidance.

The NRC Inspection Report is the document that states the official Agency position on what was inspected, what the inspectors observed, and what conclusions were reached relating to the inspection.

All enforcement, routine and escalated, and all other Agency actions which may derive out of an inspection (such as Orders) will be based upon the associated inspection report. Inspection reports must be clear, accurate, consistent and complete.

05.01 Inspection results shall be reported to the licensee by issuing one of the following:

- a. Narrative Reports - a cover letter signed by the organization BC or DD responsible for the program, depending on the significance of the inspection findings, an NOV if applicable, an inspection cover sheet, and report details, or
- b. NRC Form 591FF reports where the completed Form is left with the licensee or certificate holder - a separate cover letter transmitting the Executive Summary is sent within 30 days of the exit meeting, or
- c. NRC Form 591FF reports where the completed Form is sent from the Region II office - a cover letter signed by the inspector's BC, the NRC Form 591FF, including an Executive Summary of the inspection findings will be sent to the licensee or certificate holder within 30 days of the exit meeting.

05.02 Narrative Reports may be used to document an inspection as determined by the organization management responsible for the program, but are required to document results for:

- a. Reactive inspections of significant events.
- b. Inspections that result in an enforcement conference, escalated enforcement, or a management meeting. For such cases, the Narrative Report should only address the areas in which safety or safeguards concerns and/or violations are identified; all other areas reviewed during such an inspection should be documented by use of an NRC Form 591FF and the Executive Summary as noted below. The cover letter to the Narrative Report documenting the areas with safety or safeguards concerns

should be used to transmit the NRC Form 591FF that documents the other areas inspected.

- c. Inspections of construction and startup of major new facilities, such as a gas centrifuge enrichment facility, a mixed oxide fuel processing facility, or a major expansion of an existing facility.
- d. Inspections of facilities shut down as a result of an event.
- e. Inspections that are determined to be of such significance that a Narrative Report is appropriate as determined by the DD of the organization performing the inspection. Such inspections would include inspections of facilities implementing significant performance improvement programs. In this case, areas not subject to the performance improvement program should be documented on an NRC Form 591FF and the areas which are the subject of the performance improvement program should be documented in a Narrative Report.
- f. Decommissioning reports documenting results of activities such as confirmatory measurements or analyses which could form the basis for regulatory decisions that may allow release of the area for unconditional or other use.

0616-06 GUIDANCE FOR INSPECTION REPORT CONTENT

This section provides general guidance on the contents of inspection reports for fuel facility inspections. The Region or FCSS may prepare additional instructions or guidance on inspection reports based on the specific needs of the programs they manage. Flexibility is provided in this area because of the many disciplines covered by fuel cycle inspections. The level of detail desired in inspection reports is illustrated in report examples referenced in section 06.05. Because fuel cycle inspections cover a variety of inspections, the report writer is advised to follow the example of a report from the particular discipline or a similar discipline. Some disciplines call for a more detailed description than others. In general, provide enough detail that the report will be understandable and also useful in the subsequent inspection(s).

06.01 Narrative Report Package Contents. Narrative fuel cycle inspection reports include the following elements, arranged in the order listed:

- a. Cover Letter. The purpose of the cover letter is to transmit the inspection report results. Inspection reports are transmitted using a cover letter from the applicable NRC official as delegated by NRC Headquarters or the Regions to the designated licensee executive.
 - 1. Cover Letter Content. Cover letter content varies somewhat depending on whether the inspection identified findings. In general, however, every cover letter is based on a standard letter from the NRC Enforcement Manual and has the same basic structure, as follows:

Addresses, Date, and Salutation. At the top of the first page, the cover letter begins with the NRC seal and address, followed by the date on which the report cover letter is signed and the report issued.

For cover letters transmitting report details with findings assigned an EA number, the EA number should be placed in the upper left-hand corner above the principal addressee's name. Additionally, on event-related documents, the Nuclear Materials Events Database (NMED) number, Fuel Cycle Nuclear Materials Events Database (FCNMED) number, or NRC Event number should also be included on the document after the EA number.

The name and title of the principal addressee is placed at least four lines below the letterhead, followed by the licensee's name and address. Note that the salutation is placed after the subject line.

2. Subject Line. The subject line of the letter should state the facility name (if it is not apparent from the Addressee line), the docket or license number, and inspection subject. The words "NOTICE OF VIOLATION" (or "NOTICE OF DEVIATION," etc.) should be included if such a notice accompanies the inspection report. The entire subject line shall be capitalized.
3. Introductory Paragraphs. The first two paragraphs of the cover letter should give a brief introduction, including the type of inspection report.
4. Body. The body of the letter should discuss the most important topics first.

The cover letter is written to transmit the inspection report to the licensee's management, and to deliver the "big picture" message regarding the inspection. Because it is the highest-level document, it does not need to (and normally won't) detail all the items inspected and the inspection procedures used. It will note the areas covered by the inspection. The cover letter must never contain any significant information which is not also contained in the executive summary and supported in the report details.

The tone of the cover letter must have a correct balance. The NRC focuses on performance issues. If a licensee performed some activity 100 times, and succeeded 99 times, we will be most interested in the single failure. But that does not mean that the cover letter will make it appear that the licensee rarely succeeded. The safety and regulatory significance of any licensee failure will be a primary consideration, above and beyond the numerical frequency of failure compared to success.

The cover letter must always be consistent with the inspection report. In addition, it must be consistent with the information which the inspector conveyed to licensee managers at the exit meeting. If the inspector's understanding of the facts or the significance the findings changes after the exit meeting, the NRC shall call the licensee and re-exit. The re-exit should

be documented in the cover letter. There should never be any surprises in a cover letter to anyone who was present at the exit meeting.

Lastly, the cover letter usually should not contain recommendations. There should not be any statements to the effect, "The licensee needs to..." or, "The licensee should..." If the licensee is not meeting safety or regulatory requirements, the statements should clearly show those facts. If the NRC believes that a licensee cannot ensure the safety of its activities, then an Order or some similar official action may be appropriate. Guiding licensee decision-making through the use of a cover letter to an inspection report is not the appropriate method for accomplishing this type of action.

5. Closing. The final paragraph consists of standard legal language that varies depending on whether enforcement action is involved.

The signature of the appropriate NRC official is followed by the docket number(s), license number(s), enclosures, and distribution list.

- b. Notice of Violation (If Applicable). Licensees are officially notified that they have failed to meet regulatory requirements when NRC issues an NOV. An NOV may be sent to licensees as part of a package of documents which also includes a cover letter and associated inspection report. An NOV may be sent with a cover letter which refers to an inspection report that was distributed previously. An NOV should not be sent to the licensee in advance of the inspection report.

Every NOV must be clear, so that there is little doubt that the licensee (or other interested reader) can understand the basis for the violation. The licensee may not agree with the NRC basis, but they must understand the NRC position.

Every NOV must clearly state what requirement was not met. That may mean that the date and revision number of the applicable document will need to be provided. Then, a clear statement of what happened (including when and for how long, if the timing is important) will be provided. The intention is that any interested reader will be able to clearly see and understand what the requirement was and how it was not met. For additional guidance on documenting violations, refer to the NRC Enforcement Manual. The NOV should be an enclosure to the cover letter. Additional guidance on EAs is found in Section 07 of this document.

- c. Cover Page. The report cover page gives a quick-glance summary of information about the inspection. It contains the docket/certificate number, report number, facility name, dates of inspection, names and titles of participating inspectors, and name and title of the approving NRC manager.
- d. Executive Summary. The executive summary section of the inspection report highlights the most significant conclusions. These are usually organized into sections by inspection area, corresponding to the sections of the report. There may be conclusions in the body of the inspection report, which are of minor significance, so it is not necessary that every conclusion in the report details be repeated in the

executive summary. There should never be any conclusions in the summary which are not clearly and directly derived from the detailed discussion in the body of the report. However, the important conclusions which would provide the bases for the results of the inspection stated in the cover letter should be included. Open items are not to be listed in the summary. As appropriate, however, the summary may include a description of the safety related issues which initiated the open item. If a notice of violation is issued, the violation should be mentioned in the Conclusion and the Executive Summary.

- e. Table of Contents (If Applicable). For Narrative Reports that are considered complicated or are of significant length (i.e., the Report Details section to the Exit Interview section is more than 20 pages long), the writer should include a table of contents as an aid to clarity.
- f. Narrative Report Details. The detailed discussion in the Narrative Report provides the information which forms the bases upon which the other sections of an inspection report are developed. In most cases, the detailed discussion will be organized into one or more sections, each addressing an area of inspection. Report Details should be structured in terms of the programmatic area inspected.

The first section may address a programmatic area or be a general statement, such as, Summary of Plant Status. Normally, each following section should be divided into two parts: Scope and Observations and Conclusions. Scope and Observations should consist of paragraphs that describe the scope of the inspection followed by the observations and resultant findings within the defined scope of that paragraph. The section ends with a stated conclusion based on the inspector's observations and findings. These are discussed in more detail below.

- 1. Inspection Scope and Observations. The Scope portion of each area inspected should briefly outline what was inspected. In most cases, the approach that can be used in writing the scope should be consistent with the Inspection Procedure (IP) which was used in performing that portion. Much of the write-up can be extracted from the "Purpose" section(s) of the applicable IP. When describing the Scope, it is acceptable to state either what the inspector(s) did, or what the inspection accomplished. That is, a Scope section could be phrased, "This inspection included a review (or observation, or evaluation, etc.) of...." or it could be written as, "The inspectors reviewed (observed, evaluated) the...." The Scope statements might also describe why certain items were inspected. For example, "...to determine compliance with...."

The Observations are the foundation of every inspection report. They derive out of performing inspections according to the applicable IP. There should always be a readily-identifiable connection between the stated Scope and the reported Observations. Thus, if the Scope was to review personnel dosimetry records, the Observations will not be about packaging and shipping problems. The Observations section may, when germane to the inspection, include (1) how the inspection was conducted (i.e., the methods

of inspection), (2) what was inspected, (3) approximately when each activity was performed, (4) where the inspection took place (i.e., what room(s) or buildings), (5) the inspection objectives and/or criteria for determining whether the licensee is in compliance, as well as, (6) findings resulting from the observations.

For other reports and reports with safety or safeguards violations, Observations will be descriptive, and will be relatively detailed compared to the other parts of the report documentation package. The amount of detail will be as much as is needed to make clear what was found, and whether it was significant. The inspector should say what was observed or found in an unequivocal manner. If an inspector was looking to see if contamination was well controlled - and it was - the report should state: "Contamination was well controlled" not "Contamination appeared to be well controlled." If too small a sample was examined to reach an unequivocal conclusion, the qualifier should specifically state what was inspected. For example, the report should state that, "Contamination was well controlled in the areas examined by the inspectors." If the inspector identifies no findings during an inspection (other than minor findings), the report should state "No findings of significance were identified."

Findings that are likely to have generic concerns should include details such as the manufacturer's name and model number for components, specifications, and other names and technical data that identify the item of concern.

In the case of a finding of a violation, it is critical that enough detailed information be given so that the interested reader can understand what the requirement was, and how it was not met. After the details of what occurred are provided, two specific concluding statements should be constructed. The first statement will define what the requirement was, including the regulation.

For example, 10 CFR 20.1501, requires that "Each licensee shall make or cause to be made, surveys that (1) may be necessary for the licensee to comply with the regulations in this part, (2)" Following this, reference to any specific licensee procedure which implements the primary requirement should be provided. The second statement will describe (or refer to a preceding description) how the requirement was violated. For example, "Specifically, between July 01 and November 30, 200X, the licensee failed to sample liquid effluent streams before releasing the material to the uncontrolled environment. Additional actions or responses by the licensee, if any, should be included to fully describe the violation. Note that the duration that the violation took place should be included in the description of how the requirement was violated.

Do not speculate or reach conclusions about the intent behind a violation. Conclusions about the willfulness of a violation are agency decisions and are normally not made until after the Office of Investigations (OI) has completed an investigation. A premature or inaccurate discussion of the willfulness of

an apparent violation in the inspection report could result in later conflicts based on additional input and review. Inspection reports that include potentially willful violations must be coordinated with the OI and the OE.

If a finding is to be referred to the OI, the inspection report should not lead a reader to conclude or infer that an OI investigation is possible. For findings referred to OI, the report should contain only relevant factual information collected during the inspection. The referral to OI is made by correspondence separate from the inspection report and includes any additional information needed to support the referral. One available option is to document only the pertinent facts of the event and open an unresolved item or inspection follow-up item to track the issue until resolved. Any reports containing material that may be related to an ongoing investigation should be reviewed by OI before being issued.

2. Conclusions. The Conclusions are the determinations of whether the licensee is meeting regulatory requirements in the area inspected. Every conclusions section will either briefly state the number and general inspection area or have a statement similar to “No violations of NRC requirements were identified” or “No findings of significance were identified” if there are minor violations. **If a violation is identified, the conclusion shall briefly include the specific basis for the determination of the significance of the finding and briefly describe the logic for determining the significance, including reference to the Enforcement Policy, as applicable.**
3. Open Items. Open items reviewed during the inspection may be discussed in narrative form in the Details section of a Narrative Report but the two paragraph format is not required.
4. Exit Meeting(s) Summary. The final section of each inspection report briefly summarizes the exit meeting(s), which is also described in the first paragraph of the cover letter and identifies the most senior licensee manager who attended the meeting(s), and includes the following information:

At the exit meeting, the inspectors should verify that information which the inspector reviewed during the inspection and intends to include in the report is not proprietary. If the licensee does not identify any material as proprietary, the exit meeting summary should include a sentence to that effect. For fuel cycle facilities, most operations and information reviewed will be at least proprietary.

The MD 12 series, addresses minimum handling requirements for classified and other sensitive information. For current instructions on actions to take if the report includes Safeguards Information, proprietary information, Official Use Only information, or other sensitive material, contact the NMSS or Regional security advisor.

NOTE: Inspectors should be aware of minimum requirements for handling classified and sensitive-unclassified information (i.e., safeguards information, official use only, and proprietary information). When an inspection is likely to involve proprietary information (i.e., given the technical area or other considerations of inspection scope), how to handle such information should be discussed at the entrance meeting.

The inspector should briefly discuss the possibility of contact with the licensee management after the exit meeting to discuss new information relevant to an inspection finding. In addition, if the NRC's position on an inspection finding changes after the exit meeting, that change should be discussed with the licensee before the report is issued.

Licensee responses should not be included in the summary except in cases where the licensee disagrees with the inspection findings. In that case, the summary should state that the licensee took exception to the findings.

If at the exit meeting or at any other time during the inspection, a licensee representative makes an oral statement that it will take a specific action in response to a non-compliance, the statement may be documented in the body of the report. Details of statements made at the exit meeting should not be included in the exit meeting summary. Such statements should only be characterized in the report if the statements represent a licensee's intent to make a commitment. Actual commitments from licensees to take specific actions to correct violations must be made in writing by the licensee. Licensees frequently discuss how they plan to correct potential violations, but oral statements of how corrections will be made are not commitments. A licensee is required to correct violations, and might take one of several approaches. The report cover letter must include a provision for the licensee to respond if the intent to make a commitment documented in the report does not accurately reflect the licensee's corrective actions or position. Licensee commitments are documented by licensee correspondence, after which the inspector may reference the correspondence in the inspection report. For further licensee guidance on managing regulatory commitments, see ADAMS Accession Nos. ML003680088 (NEI 99-04), ML003680078 (NEI Cover Letter), and ML003679799 (SECY 00-045 endorsing NEI 99-04 guidance).

Because regulatory commitments are a sensitive area, the inspector should ensure that any reporting of licensee statements are paraphrased accurately, and contain appropriate reference to any applicable licensee document.

06.02 Supplementary Information. The attachments discussed below are included at the end of the inspection report if applicable to the inspection. The attachments may be combined into a single attachment entitled "Supplementary Information."

- a. Key Points of Contact. The inspector lists, 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; a list of 5-10 individuals is sufficient. 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.

- b. List of Items Opened, Closed, and Discussed. The report should include, at the BC's discretion, a quick-reference list of items opened and closed. Open items that were discussed (but not closed) should also be included in this list, along with a reference to the sections in the report in which the items are discussed.
- c. Documents Reviewed. To meet the intent of IMC 620, "Inspection Documents and Records," the report should list the types documents and records reviewed during an inspection if not already listed in the body of the report. In the interest of report usefulness and to assure effective use of staff time, reports need only to specifically identify documents that support any violation. A list of such documents may be included in the inspection report or as an attachment. Note that documents obtained from a licensee to provide background information for inspection preparation are not required to be placed in the Public Document Room (PDR); however, while in NRC possession, the background documents are subject to the Freedom of Information Act (FOIA) requests. Documents or excerpts of documents, retained by an NRC inspector in the rare instance that they are necessary to substantiate an inspection finding, are considered final NRC records and must be placed in the PDR. Exceptions may include documents protected under 10 CFR 2.390 or those with restricted public access due to internal Agency rules concerning information security.
- d. List of Inspection Procedures Used for Narrative Inspection Reports. A summary list of numbers and titles used during the inspection should be added in the narrative inspection report.
- e. List of Acronyms and Initialisms. Reports whose details section exceeds 20 pages should include a list of acronyms (includes initialisms). For reports in which a relatively small number of acronyms have been used, the list is optional. In all cases, however, acronyms should be spelled out when first used in the inspection report text. If an acronym is used more than once in the report, it is to be included in the definitions.
- f. Other. Any other entry as appropriate.

06.03 NRC Form 591FF Report Package Contents. For an NRC Form 591FF report, the executive summary lists the conclusions as above without the supporting details.

The NRC Form 591FF Report Contents consist of a cover letter, NOV, and Executive Summary as with Narrative Reports. Also included is the NRC Form 591FF that includes the Exit Meeting Summary, Key Points of Contact, and list of Items Opened, Closed, and Discussed as for Narrative Reports.

The NRC Form 591FF inspection records do not have to be typed, but should be legible and should contain the following:

- a. The procedure(s) used, noting any sections of each procedure which are required for program completion which were not completed;
- b. The areas of the safety or security program examined;
- c. The status of follow-up items involving prior enforcement or reported licensee or certificate holder events;
- d. Sufficient information to support cited violations, NCVs, and closed violations identified during a previous inspection;
- e. Description of completed and anticipated corrective actions for any identified violations; and;
- f. A succinct description of the scope of the licensee's program.

The scope of a licensee's program should be documented on NRC Form 591FF Part 3, to the extent possible, excluding proprietary information. If proprietary information is included on this Form, it should be marked and treated as proprietary. A different inspector should be able to use the inspection report in preparing for a subsequent inspection, and to determine what corrective actions for findings were planned by the licensee.

If an NRC Form 591FF is to be left with the licensee or certificate holder at the exit meeting, the inspector must discuss the inspection findings and proposed content of the NRC Form 591FF with the BC of the designated facility prior to the exit meeting and receive BC approval to leave the NRC Form 591FF and return with a copy.

When the NRC Form 591FF Parts 1 and 2 are used to document the results of an inspection, the inspector must ensure that each cited and non-cited violation on the form includes: a brief statement of the circumstances, including the date(s) and length of time that the violation or NCV took place, who violated the requirement, and the facts necessary to demonstrate that a requirement was not met, reference to the regulation or license condition that was violated, and a description of the licensee's corrective actions if available. For NCVs, the NRC Form 591FF should document why the violation was not cited and the corrective action taken or planned. The following is an example of a cited violation on a NRC Form 591FF:

EXAMPLE: "As required by Section X.X of the license application, the licensee did not follow section X.X of Procedure X.X and perform a quarterly functional test of in-line monitor IM-2 actuation of valves V-1 and V-2 during the period from January 1, 2005, to May 31, 2005. The functional test conducted on May 31, 2005, was satisfactory. The licensee added this functional test to the

functional test reminder system to notify staff to perform the tests.”

For ease in retrieval of inspection report information from ADAMS, where possible the cover letter, NOV and narrative report details or NRC Form 591FF should, except for escalated enforcement where they are normally issued at different times, be placed in ADAMS as one document.

06.04 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 routinely disclosed to the public. Information that should not appear in an inspection report is described in 10 CFR 2.390 and 9.17. MD 8.8, Management of Allegations, addresses the manner in which an inspection report may be used to document allegation follow up activities. IMC 0620, “Inspection Documents and Records,” gives guidance on acquiring and controlling NRC records, including inspection-related documents. Sensitive-unclassified information (i.e., safeguards information, official use only, proprietary information) should not be released as per instructions from the Office of Administration, Division of Facility Security. Refer to the Facilities Security section of the ADM home page on the NRC internal web site for proper handling instructions.
- 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 9.17, and must not be circulated outside the NRC without specific approval of the OI approving official.

06.05 Example Reports. The examples of fuel cycle inspection reports provided in ADAMS show the desired structure and recommended level of detail for Narrative Reports and 591FF reports (see ML072530609).

06.06 Significance of Observations. This section discusses the significance of observations including violations, non-compliances and enforcement actions. The guidance provided in this section is for informational purposes. Final agency actions shall be reviewed against the guidance contained in the NRC Enforcement Policy and the NRC Enforcement Manual.

06.07 Threshold of Significance. When conducting inspections, the NRC inspector only reviews a small number of selected procedures, events, and operations; he or she cannot hope to monitor all the activities in progress, nor to document every minor discrepancy that occurs. As part of maintaining a focus on safety, inspectors continually use NRC requirements, inspection procedures, industry standards, regional and headquarters guidance, and their own training and insight to make judgments about which issues are worth pursuing and which are not.

To communicate effectively, inspection reports must give evidence of that judgment and prioritization, discussing significant safety issues in appropriate detail, treating less significant issues succinctly, and avoiding excess verbiage. To maintain some consistency in how minor issues are treated, report writers must recognize certain “thresholds of significance” that is, they must use similar criteria in deciding whether an issue is important enough to document, important enough to track or follow up, etc.

- a. Thresholds of Significance for Noncompliance Issues. The NRC Enforcement Policy acknowledges that some violations of minor safety, safeguards, environmental, and regulatory concern are below the level of significance of SL IV violations. Because of their minor nature, these “minor” violations are not the subject of formal enforcement action and are not usually documented in inspection reports.

NOTE: For additional guidance in this area, see the NRC Enforcement Manual. Also, Appendix E to IMC 0612, Power Reactor Inspection Reports, contains examples of minor issues which are violations of requirements but have insignificant safety, safeguard, or regulatory impact or have no more than minimal risk. The appendix explains how to determine whether or not the issue is minor. Depending on the circumstances of the observations and the judgments of the inspector and their supervisor, an issue which is similar to an example in the appendix should be considered to be a minor violation which would not be documented in a fuel cycle facility inspection report.

1. Minor Violations--Determining Whether to Document. In general, minor violations should not be documented; however, certain exceptions apply. Documentation may be necessary as part of the resolution of an allegation. In other cases, while the violation itself is minor, the associated technical information may relate directly to an issue of Agency-wide concern (e.g., the inspection was performed in response to an NRC Temporary Instruction (TI)). If, for these reasons or any other reason, the report writers and reviewers wish to document a minor violation, then it should be documented as a minor violation, with a reference to Section IV of the NRC Enforcement Policy. For example, “This failure constitutes a violation of minor significance and is not subject to formal enforcement action.”
2. Violations Identified as Part of the Licensee’s Self-Assessments or as Part of Licensee Problem Identification and Resolution (PI&R) Programs. Under certain circumstances, a violation that could be classified as a non-cited violation (NCV) need not be documented. This is generally justified when the licensee identifies the violation and enters it into the licensee’s corrective action program or established PI&R program. As a matter of Enforcement Policy, NRC enforcement seeks to encourage licensee problem identification and resolution efforts, and seeks to avoid the negative impact that can result from a redundant NRC emphasis on problems which the licensee’s responsible action has already identified and corrected.

For example, suppose that while evaluating the licensee’s quality assurance efforts in the fire protection area, an inspector reviews relevant audits and

surveillances conducted over the previous year. The review reveals that the audits have been probing and thorough; the findings are well-developed and technically sound, and include six noncompliance issues, four of which might be classified at SL IV.

In such a case, the inspector should follow up on the non-compliances and other audit findings to ensure that root causes have been appropriately assessed, that appropriate and comprehensive corrective actions have been taken, and that no new examples of the violations exist. Provided, however, that no new problems are revealed by this follow-up, the inspector is normally not expected to cite the four violations individually, nor to report the details of those violations in the inspection report. Instead, the NRC report findings and conclusions should assess the adequacy of the licensee's quality assurance efforts, including a clear reference to the name, dates, and general subject matter of the audit or self-assessment.

Similarly, if a licensee operator or supervisor identifies a non-compliance during their normal duties or as part of a peer review, the process described above for non-compliances from audit findings should be followed.

NOTE: This expectation only applies to SL IV violations and non-willful violations. Even when identified through a licensee self-assessment, violations that could be categorized at SL III or above must be documented in the inspection report and given appropriate follow-up.

The inspection report might document one or more of the violations found in a licensee self-assessment or formal corrective action program due to the technical significance or generic implications of the particular item. Technical details surrounding the violation may provide useful insight on equipment or system reliability, or on some aspect of human performance. In some cases, the inspector may decide to pursue additional follow-up of a particular licensee finding because of related licensee problems, previous NRC observations or violations involving the same or a related topic, or emerging agency or industry sensitivity in the given technical area.

If, for any of these reasons, the issuing office decides to discuss a particular licensee self-assessment finding or audit finding in the inspection report, and that finding involves a violation, then the violation must be clearly dispositioned in the report. The violation may be dispositioned as a NCV unless any one of the circumstances listed in Section VI.A.8 of the NRC Enforcement Policy results in an NOV requiring a formal written response from the licensee. If the issue represents a minor violation, it should be documented as follows: "Although this issue should be corrected, it constitutes a violation of minor significance that is not subject to enforcement action in accordance with section IV of the Enforcement Policy."

NOTE: The NRC Enforcement Manual provides additional guidance on documenting and dispositioning violations.

- b. Thresholds of Significance for Non-Enforcement-Related Issues. Inspectors must also make judgments about the safety or safeguards significance of non-enforcement-related findings. Questions on the relative significance of an issue should be discussed with NRC managers.

1. 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:

- (a) Does this finding have any actual impact (or any significant potential for impact) on safety or safeguards?
- (b) Is this finding illustrative of a programmatic licensee problem that could have a safety, safeguards, or regulatory impact?
- (c) Does this finding provide insights on an equipment, system, or human performance problem?
- (d) Could this finding be viewed as the possible precursor to a significant event?
- (e) If the licensee takes no action on this matter, will the condition worsen (i.e., will the safety or safeguards significance increase)?
- (f) If this finding recurs, will its recurrence result in more significant or additional safety or safeguards concerns?
- (g) Will this information be useful in assessing the long-term performance of this licensee program or functional area?
- (h) Does this finding have generic significance?

If the answer to any one of these questions is “yes,” the finding should be documented in the inspection report. If the answers to all questions are “no,” the finding normally should not be documented.

2. Findings Previously Covered in Licensee Self-Assessments. This decision should be treated similarly to the corresponding decision for enforcement issues. In general, little benefit exists in NRC’s re-emphasis of issues already covered in licensee self-assessments, unless the licensee’s actions do not adequately address the safety or safeguards issues.

In some instances, however, the technical significance or generic implications of an issue merit ensuring that it is discussed on the docket and preserved as a matter of public record. If the licensee self-assessment that initially discussed the issue is already on the docket, the inspection report may simply refer to the discussion in the licensee self-assessment. If more

detail is needed, or if the licensee self-assessment is not on the docket, the inspector may wish to discuss the issue in the inspection report narrative.

06.08 Documenting Noncompliance. The primary guidance for all matters related to enforcement, including documentation, is given in the NRC Enforcement Policy and the NRC Enforcement Manual. The following discussion summarizes certain aspects of that guidance related to inspection reports.

- a. Types of Noncompliance. The manner of documenting a noncompliance in the inspection report depends on how that noncompliance will be dispositioned. A noncompliance may be addressed as a non-escalated enforcement action (i.e., an SL IV violation, a deviation, or a nonconformance); as an escalated enforcement action (i.e., an apparent SL I, II, or III violation); or as an NCV.

Note that a noncompliance may not be documented simply as a “weakness,” “licensee failure,” or a similar informal characterization. If the report narrative describes a condition or event in a manner that suggests to the reader that a violation may have occurred, then the finding must be clearly dispositioned as a violation, an apparent violation, or an NCV. If a violation does not exist (e.g., no requirement exists in this area), it may be appropriate to clarify the finding by stating that “this condition [or event] does not constitute a violation of NRC requirements.” (A possible exception concerns the special case of emergency exercise observations where “weakness” may be a valid description of the finding).

1. Non-Escalated Enforcement Actions. Most violations of low significance (i.e., more than minor concerns) fall into the SL IV category. If at the time of issuing the inspection report a violation has been categorized at SL IV, then an NOV is generally sent out with the inspection report, as a “non-escalated” EA. The cover letter for reports that include non-escalated EAs should follow the appropriate NRC Enforcement Manual guidance.

NOTE: A violation’s SL should not be discussed in the report details. Whether an NOV accompanies the report or is issued later, the designation of SL is made in the NOV itself. **However, to substantiate the significance of the violation, the report details shall briefly describe the logic for determining the significance with possible reference to a specific Enforcement Policy violation example, if applicable.**

Deviations and nonconformances are also considered non-escalated enforcement actions. When a licensee fails to meet a regulatory commitment or to conform to the provisions of an applicable code or industry standard, the failure may result in a Notice of Deviation. When a vendor or certificate holder fails to meet a contract requirement related to NRC activities, the failure may result in a Notice of Nonconformance. While less frequently issued than SL IV NOVs, these non-escalated EAs follow a similar format and require a similar level of report detail.

2. Potential Escalated Enforcement Actions. When an issue is being considered for escalated EA, the inspection report narrative should refer to

the potential noncompliance as an “apparent violation.” The report details should not include any speculation on the SL of such violations nor on expected NRC enforcement sanctions. Potential EAs, by their nature, require further Agency deliberation (and, usually, additional licensee input) to determine the appropriate SL and NRC action.

Similarly, report narratives that discuss apparent violations should be carefully constructed to avoid making explicit conclusions (i.e., final judgments) about the safety or safeguards significance of the issue. The report should include any available details that demonstrate safety or safeguards significance, or that would help in making such a decision and should also describe any corrective actions taken or planned by the licensee. However, since a potential escalated enforcement action automatically entails further evaluative steps, neither the inspection report details nor the accompanying cover letter should present a final judgment on the issue.

3. Non-Cited Violations. Licensee-identified Severity Level IV violations that have a very low safety or safeguards significance may be dispositioned as NCVs. When this criteria is satisfied, the report should briefly describe the circumstances of the violation, the corrective actions the licensee has taken or plans to take, and conclude with the following boilerplate statement: “This non-repetitive, licensee-identified and corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A.8 of the NRC Enforcement Policy.” Rarely, circumstances may result in consideration of an NOV requiring a formal written response from a licensee. The criterion for requiring a written response for an NOV is described in Section VI.A.8 of the NRC Enforcement Policy.

In addition, the NRC Enforcement Policy also provides that willful SL IV violations may be dispositioned as NCVs provided that they meet the four criteria outlined in Section VI.A.8.d of the Enforcement Policy. In these cases, the inspection report should include additional discussion to address this before providing the standard conclusive language. For example: “Although this violation is willful, it was brought to the NRC’s attention by the licensee, it involved isolated acts of a low-level individual without management involvement, and the violation was not caused by a lack of management oversight, and it was addressed by appropriate remedial action. Therefore, this non-repetitive, licensee-identified and corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A.8 of the NRC Enforcement Policy.”

4. Minor Violations. Minor violations should not normally be documented in inspection reports. However, to the extent that documentation is necessary, the standard language should be used: “Although this issue should be corrected, it constitutes a violation of minor significance that is not subject to enforcement action in accordance with Section IV of the NRC Enforcement Policy.”

5. Enforcement Discretion. There are various subsections under the NRC Enforcement Policy in Section VII.B 2-6 where discretion is exercised and formal citations are not issued. The approval of the Director, Office of Enforcement, in consultation with the Deputy Executive Director as warranted, is required for exercising discretion of the type described in Section VII.B 2-6. Where discretion is being exercised for a violation that meets the criteria of Section VII.B.2-6 of the Enforcement Policy, the subject report should state: "Discretion is being exercised after consultation with the Office of Enforcement pursuant to Section VII.B of the Enforcement Policy and a violation is not being issued."

- b. Supporting Details and Discussions of Safety or Safeguards Significance. The discussion of noncompliance issues must be sufficiently detailed to substantiate any NRC safety, safeguards, and regulatory concerns and to support any enforcement sanction the NRC may choose to issue. At a minimum, for a violation, the report should state:
 1. What requirement was violated;
 2. How the violation occurred;
 3. When the violation occurred, and how long it existed;
 4. Who identified it, and when;
 5. Any actual or potential safety consequence;
 6. The root cause (if identified);
 7. Whether the violation appears isolated or programmatic;
 8. What corrective actions have been taken or planned; and
 9. Who was involved with the violation (i.e., management involvement or low-level individual)?

The degree of detail necessary to support an enforcement action is a function of the significance and complexity of the noncompliance.

Although supporting details clearly assist in determining the safety or safeguards significance of the noncompliance, inspectors should be cautious in making direct statements regarding safety or safeguards significance in the inspection report details. Violation SLs, as described in the NRC Enforcement Policy, are based on the degree of safety or safeguards significance involved. In assessing the significance of a noncompliance, the NRC considers four specific issues: (1) actual safety or safeguards consequences; (2) potential safety or safeguards consequences, including the consideration of risk information; (3) potential for impacting the NRC's ability to perform its regulatory function; and (4) any willful

aspects of the violation. As a result, if an inspection report refers to a noncompliance as being “of low safety or safeguards significance” (meaning, in a general sense, that the noncompliance did not result in any actual adverse impact on equipment or personnel), the writer may have inadvertently made it difficult for the NRC to subsequently decide that the potential for an adverse impact or the regulatory significance of the noncompliance warrants issuance of a SL III violation. Therefore, before characterizing a violation as being of “low safety or safeguards significance,” the inspector should also address the potential consequences and regulatory consequences of the violation in addition to the absence of an actual adverse consequence.

- c. Noncompliance Involving Willfulness. Inspection reports should neither speculate nor reach conclusions about the intent behind a violation, such as whether it was deliberate, willful, or due to careless disregard. As with any observation, the report discussion should include relevant details on the circumstances of the violation without making a conclusion about the intent of the violator:

EXAMPLE: “The technician failed to follow established sampling procedures, although he had informed the inspectors earlier that he had been properly trained on the use of the proper tools and technique;” not, “The technician deliberately failed to take QA samples using established procedures.”

Conclusions about the willfulness of a violation are agency decisions, and are normally not made until after the OI has completed an investigation. A premature or inaccurate discussion of the willfulness of an apparent violation in the inspection report could result in later conflicts based on additional input and review. Inspection reports that include potentially willful violations are to be coordinated with OI and the OE.

0616-07 RELEASE AND DISCLOSURE OF INSPECTION REPORTS AND ASSOCIATED DOCUMENTS

07.01 General Public Disclosure and Exemptions. Except for report enclosures containing exempt information and security and safeguards inspections, all final inspection reports will be routinely disclosed to the public. Information that should not appear in an inspection report is described in 10 CFR 2.390 and 9.17. MD 8.8, Management of Allegations, addresses the manner in which an inspection report may be used to document allegation follow up activities. IMC 0620, “Inspection Documents and Records,” provides guidance on acquisition and control of NRC records, including inspection-related documents.

07.02 Release of Investigation-Related Information.

- a. When an inspector accompanies an investigator on an investigation, the inspector shall not release either the investigation report nor his or her individual input to the investigation report. This information is exempt from disclosure as provided by

10 CFR 9.17, subject to determination by OI. OI reports of investigations will not be circulated outside the NRC without specific approval of the OI approving official.

- b. Generally, NRC technical and safety or safeguards concerns can be communicated to a licensee without revealing that an investigation is contemplated or underway. However, when information cannot be released without risk of compromising an investigation, the Regional Administrator (RA) or NMSS Office Director (OD) will inform the OI Field Office Director, in advance, that safety or safeguards concerns require releasing information related to an open investigation to the licensee. The OI Field Office Director will review the information to be released and advise the RA or OD of the anticipated effect on the course of the investigation. The RA or OD will release the information only after determining that the safety or safeguards concerns are significant enough to justify the risk of compromising the pending investigation and any potential subsequent regulatory action.

Conversely, when the RA or OD decides, after consultation with the OI Field Office Director, to delay informing the licensee of an issue, the RA or OD should document this decision, including the basis for determining that the delay is consistent with public health and safety or safeguards considerations. Any such decision should be reexamined every three months to assure validity of the delay to inform the licensee about the technical and safety or safeguards concerns until the investigation is closed.

- c. When an emergency or significant safety or safeguards issue appears to require immediate action, NRC employees, at their discretion, may discuss with, show to, or provide the licensee any pertinent material they believe the circumstances warrant. If time permits, regional management should be consulted first. An emergency situation meeting this criteria is one in which, in the opinion of the senior NRC employee cognizant of the situation, a present danger to public health or safety or to the common defense and security requires the release of investigative information to a licensee without the delay necessary to consult with appropriate OI personnel.
- d. If an issue disclosed during an inspection is to be referred to OI for possible investigative action, the inspection report should not contain information that would lead a reader to conclude or infer that an investigation may be opened. In this case, the report should contain only relevant factual information collected during the inspection. The referral to OI should be made by separate correspondence, with any additional information needed to support the referral.

END

Attachments: Appendix A - Inspection Report Writing Style Guidance
Appendix B - List of Acronyms and Initialisms Used in this Inspection Manual Chapter
Attachment 1 - Revision History for IMC 0616

APPENDIX A

INSPECTION REPORT WRITING STYLE GUIDANCE

The Inspection Report Writing Guide consists of “how to” instructions and information, arranged in alphabetical order for quick reference. These instructions are primarily derived from the NRC Editorial Style Guide and the GPO Style Manual. The NRC Editorial Style Guide, NUREG-1379, may be found in ADAMS at ML041050307.

ABBREVIATIONS AND SYMBOLS

Chapter 9 of the *GPO Style Manual* is a good reference for standard letter symbols for units of measure. In addition, standard symbols apply for units of radiation.

EXAMPLE:	bp	boiling point	Ci	Curie(s)	Bq	Bequerel
	kV	kilovolt	mCi	milliCurie	Sv	Sievert
	MW	megawatt	μ Ci	microCurie	Gy	Gray

In technical text, use abbreviations for units of measure only if they are used with number values.

EXAMPLE: 200 R/min

ACRONYMS AND INITIALISMS

An acronym is an abbreviation that is formed by combining the first letter or letters of several words. Acronyms are pronounced as words and are written without periods.

EXAMPLE: Item Relied On For Safety (IROFS); pronounced “i-rofs”

An initialism is an abbreviation that is formed by combining the initial letter of each word in a multiword term. Initialisms are pronounced as separate letters.

EXAMPLE: Nuclear Regulatory Commission (NRC)

Limit the use of acronyms and initialisms to those cases where not using them would lead to a distracting repetitiveness of phrasing. Sentences should not begin with an acronym or initialism.

When you use an acronym, always use capital letters without periods. Initialisms may be written in either upper case or lower case. Generally, do not use periods when the acronyms or initialisms are upper case, but use periods when the initialisms are in lower case. Two exceptions are except for geographical names and academic degrees.

Treat the inspection report as three separate documents: the cover letter, the notice of violation, and the body of the report (this includes the executive summary). Avoid using acronyms or initialisms in the cover letter or the executive summary as much as possible. The first time an acronym or initialism appears in any document, write the complete term, followed by the abbreviated form in parentheses. An acronym or initialism should not be used in a title line within the report.

The plural for most acronyms and initialisms adds a lower case “s” without an apostrophe.

EXAMPLE: RSOs
 TIs

To decide whether “a” or “an” should precede an acronym or initialism, pronounce the first letter or syllable of the abbreviation.

EXAMPLE: an NRC inspector (N is a vowel sound)
 a TI (T is a consonant sound)

The acronym and initialism list at the end of the inspection report should be titled “Acronyms and Initialisms List.” No list is needed if the report is short and contained relatively few acronyms and initialisms.

ACTIVE VOICE

Use the active voice for most of your inspection report writing.

EXAMPLE: Active Voice - The inspector surveyed the laboratory. The inspector interviewed and questioned the staff.

Passive Voice - The laboratory was surveyed by the inspector. It was evaluated by interviewing and questioning the staff by the inspector.

Active voice provides information more simply and clearly. As a general rule, simple declarative sentences are best.

AFFECT/EFFECT

Affect is a verb that means “influence”.

EXAMPLE: The NRC’s decision concerning control rod placement affects all utilities.

Effect can function either as a verb that means “bring about” or “cause” or as a noun that means “result.” It is best to avoid using *effect* as a verb. Use a less formal word, such as *made*.

CHANGE: The inspector effected several report changes that had a good effect.

TO: The inspector made several report changes that had a good effect.

APOSTROPHES

The apostrophe (') is used to show possession and to mark the omission of letters.

EXAMPLE: The inspectors' (possession) comments were very appropriate for that situation.

It's (omission of letters) my belief that the laboratory technician was performing his job correctly.

BRACKETS

The bracket symbol is used to insert comments or corrections in quoted material.

EXAMPLE: The *GPO [Government Printing Office] Style Manual* is an excellent reference tool.

CAPITALIZATION

General rule: Use capitalization in report writing for proper nouns and to emphasize a specific, important word. These words are important to the message of the report. Limit your capitalization to important words only.

Use the lower case for most terms (systems, components, etc), but capitalize anything that directly refers to a specific item (except page and paragraph).

EXAMPLES: Train A disabled one train of ... disabled Train A of ...
Chapter 3 reviewed the chapter on ... reviewed Chapter 3...
Appendix B
Plant 1

Capitalize specific titles of persons or organizations, but not general references to them. (However, do not capitalize the many common job titles at a large facility; for example, health physicist, reactor operator, plant superintendent.)

EXAMPLE: Director, Office of Personnel (but--the office director)

Capitalize the following governmental organizations.

Federal
Federal Government
State (but--Do not capitalize local)

Capitalize the first word and all important words in titles of publications and legislation.

EXAMPLE: The Paperwork Reduction Act of 1982.

Do not capitalize articles, prepositions (except for "To" as part of an infinitive), and conjunctions unless they are the first word of a title or capitalization is important to its meaning.

Capitalize when referencing a violation, unresolved item, or inspector follow-up item that is used to reference a tracking number in the body of the inspection report.

EXAMPLE: as a Violation of License Condition D.5 (70-0xx/2001-xxx).

Capitalize a trade name.

EXAMPLE: Xerox
Halogen

COLONS

Use a colon (:) after a complete clause to introduce a list, whether or not the list is within a sentence.

EXAMPLE: The test measures these three areas: management motives, management strengths, and styles of leadership.

Capitalize the first word of each item in a columnar list that follows a colon or a dash (use a colon following a complete statement and a dash following a phrase). Use a semicolon after each item in a list and a conjunction after the next-to-last item in the list unless each item in the list is a complete sentence.

EXAMPLE: To renew your license you must complete the following:

- (1) Complete and sign Form 61;
- (2) Copy the original form; and
- (3) Return the original to Personnel.

Everyone must –

- (1) Complete and sign Form 61;
- (2) Copy the original form; and
- (3) Return the original to Personnel

COMMAS

Use a comma after each member of a series of three or more words, letters, figures, phrases, or clauses. Change the usual commas in a series to semi-colons if commas are prevalent within the elements of the series.

EXAMPLE: In addition, the NRC may, after assessing a situation, order a licensee to continue, curtail, or modify activities; ensure compliance with safety and emergency procedures; and maintain records of these mandatory actions.

Use a comma after an introductory phrase of five or more words.

EXAMPLE: After reviewing the notes of the supporting specialist inspector, the team leader had a clearer understanding of the message.

Use a comma before and after an explanatory equivalent of another word or phrase.

EXAMPLE: Todd Brewer, President of FFUS, met with the Commissioner.

Use a comma before and after the State when citing the city and State in a text.

EXAMPLE: The meeting is in Chicago, Illinois, on April 5 at 3:00 p.m.

Do not use a comma between the State and the ZIP Code in an address.

EXAMPLE: Bethesda, MD 20014

Use the following format when referring to a title or portion of a title of the *Code of Federal Regulations*.

EXAMPLE: 10 CFR Part 20, Appendix B, or
Appendix B to 10 CFR Part 20

Use a comma between independent clauses that are linked by a coordinating conjunction (*and, but, or, nor, and sometimes so, yet, and for*). The comma precedes the conjunction.

EXAMPLE: The inspectors were diligent about keeping their schedules consistent with demand, but this month travel constraints have been a problem.

Omit commas when the word or phrase does not interrupt the continuity of thought.

EXAMPLE: I therefore suggest that we begin the inspection.

Conjunctive adverbs (*however, nevertheless, consequently, for example, on the other hand*) joining independent clauses are preceded by a semicolon and followed by a comma.

EXAMPLE: Your idea is good; however, your format is poor.

A comma always goes inside quotation marks.

COMPOUND WORDS

Compound words are words formed when two or more words act together.

Write compounds as two words when the compounds appear with the words in their customary order and when the meaning is clear.

EXAMPLE: test case
 sick leave

Most words with short prefixes are not true compounds. Such words are usually written without a space or a hyphen.

EXAMPLE: biweekly
 Foretell
 Semiannual

Hyphenate compounds that modify or describe other words.

EXAMPLE: rear-engine bracket

Compounds used as verbs require separate words.

EXAMPLE: to follow up
 to shut down
 to shut off
 to stand by
 to start up
 to take off

DATES

When specifying dates in the body of the inspection report, avoid using the year when the date is clearly within the inspection period.

CHANGE: was noted on January 10, 2002.
TO: was noted on January 10.

Use a comma before and after the year in a three-element date written in the order of month, day, and year. Do not use a comma in a two-element date.

EXAMPLE: On February 26, 1992, the questions concerning nuclear waste were addressed in Pittsburgh.

On March 4 the inspector toured the facilities described as licensed locations of use.

USE of “e.g.” and “i.e.”

These abbreviations are from the Latin and they do not save enough space to justify possible misunderstanding. Avoid e.g. and i.e. in your writing.

FONT

The default font for an inspection reports is Arial 11. Do not use other fonts. If you are building a report from a source document which is in another font, change it to Arial 11.

HYPHENS

Avoid the use of double hyphenated words.

Chapters 6 and 7 of the *GPO Style Manual* present guidance for compounding words and a list of words indicating whether to use them open, solid, or hyphenated.

Compound terms that modify nouns are called unit modifiers. Those that precede nouns are typically hyphenated. Those that follow the nouns they modify are typically not hyphenated.

EXAMPLE: An NRC-sponsored study (but--a study sponsored by NRC)

Use a hyphen between the modifier and present participle.

EXAMPLE: far-reaching effects
hard-working staff

Use a hyphen between the modifier and past participle.

EXAMPLE: safety-related valves
well-defined goals

Do not hyphenate a modifier ending in *ly*.

EXAMPLE: poorly managed facility

Put a hyphen after suspended modifiers.

EXAMPLE: industry- and agency-sponsored studies

long- and short-term goals

Hyphenate unit modifiers that include numbers.

EXAMPLE: 18-inch pipe
 three-shift operation

Generally, do not hyphenate prefixes unless “Spell check” flags the word as misspelled.

EXAMPLE: counterblow should be counter-blow
 midpoint
 nonperson
 progovernment

INSURE/ENSURE/ASSURE

Insure, *ensure*, and *assure* all mean “make secure or certain.” *Assure* refers to persons, and it alone has the connotation of setting a person’s mind at rest (for instance, I assure you that the unit will be up and running by tomorrow.) *Ensure* and *insure* also mean “make secure from harm” (for instance, the environment needs to be clear of smoke to ensure that visibility is good.) Only *insure* is widely used in the sense of guaranteeing the value of life or property, (for instance, the licensee should insure the property.)

ITALICS

Italicize the titles of books, periodicals, newspapers, movies, and paintings.

Titles of chapters or articles within publications and titles of reports are placed in quotation marks, not italicized.

“Clarity, the Technical Writer’s Tightrope” was an article in *Technical Communications*.

NOTICE OF VIOLATION GUIDANCE

Considerable enforcement guidance material has been issued. The references to be used as the primary guides for enforcement documentation are in the [NRC Enforcement Manual](#).

For each violation written there should be a “contrary to” statement. There should only be one “contrary to” statement per violation, not one for every example.

NUMBERS

Spell out numbers one through nine.

Use figures for a single number of 10 or more.

Spell out a number that begins a sentence.

When two or more related numbers appear in a sentence and one of them is 10 or more, use a figure for each number.

Use figures to express a unit of measurement, time or money. This usage does not affect other numerical expressions in a sentence.

EXAMPLE: 2 Curies
 15 Roentgens
 3:45 p.m.

An ordinal number expresses order or position in a sequence. Apply the general rules for numbers in this section to ordinal numbers.

EXAMPLE: The third quarter earnings indicated an increase in sales.
 The 22nd and 23rd years of plant operation were the most
 productive.
 On the 27th of March (not March 27th)

When two numbers appear in sequence, use a figure for one and spell out the other.

EXAMPLE: The inspector examined ten 12-inch pipes.

Spell out a fraction standing alone; a fraction followed by *of*, *a*, *or*, *an*; and a fraction approximation.

EXAMPLE: The water on three-fourths of the site was contaminated.

Use figures for a fraction in a unit modifier.

EXAMPLE: ½-inch width

Use figures when combining whole numbers and fractions.

EXAMPLE: 2 ½ inches wide

Use figures for all decimals.

EXAMPLE: 1.2 gallons

For quantities of less than one, use a zero before the decimal point.

EXAMPLE: 0.04 mrem per hour

OBJECTIVITY

Avoid “preaching” in an inspection report. Preaching is personal. When writing an inspection report avoid wit, irony, sarcasm and personal comments.

PARENTHESES

Parentheses () are used to enclose words, phrases, or sentences. The material within parentheses can add clarity to a statement without altering its meaning.

EXAMPLE: Aluminum is extracted from its ore (called bauxite) in three stages.

PERCENT

The word “percent” is used instead of the symbol (%) except in tables.

PRONOUNS

Avoid the vague use of pronouns.

CHANGE: This is something to consider.
TO: This shortfall in payments is something to consider.

CHANGE: It was a good choice.
TO: Deciding to bring the unit offline was a good choice.

CHANGE: Those were issues.
TO: Housekeeping and maintenance items were issues.

CHANGE: These are difficult.
TO: The exercises are difficult.

QUOTATION MARKS

Commas and periods always go inside the quotation mark (.”) (,”). Semicolons and Colons always go outside the quotation mark (“;”) (“:”).

SEMICOLONS

Use a semicolon (;) to separate closely related or contrasting statements.

EXAMPLE: He agrees; I do not.

UNITS OF MEASURE

The inspection report should follow the standard NRC Enforcement Policy which is SI units followed by the equivalent special units in parentheses.

EXAMPLE: 2 sieverts (200 rems)

VERB TENSE

Reports should be written in the past tense. You inspected before the report was written. You are describing what you did and what you found. It is permissible to use the present tense if it is clearly accurate to describe what not only was but still is, especially if the use of past tense diminishes the impact of any conclusion we had or have in the subject area.

VOCABULARY

Use plain language. The purpose of the inspection report is to report facts and the interpretation of those facts. Most of the time, simpler language is better. For example, the word “about” is usually a better choice than “approximately” and the word “use” is preferable to “utilize.”

Use the right word. For example, the word “methodology” which is the study or collection of methods, is often incorrectly used in place of “method(s).” Similarly, “quote” is a verb and is often used improperly in place of “quotation” when the noun form was meant.

Eliminate unnecessary words.

The following are examples of the many redundant words that are used in writing. The redundant expression appears in the left column; the right column provides simpler language.

absolutely essential	essential
assembled together	assembled
basic fundamentals	fundamentals
collect together	collect
continue on	continue

Avoid wordy phrases.

The following are a few examples of commonly used wordy phrases. The wordy phrase appears in the left column; the right column provides simpler language.

a large number of	many
a majority of	most
at that time	then

at the conclusion of	after
detailed information	details
in few cases	seldom
in the event of	if
prior to	before

Further plain language references can be found at <http://www.plainlanguage.gov>.

WORD USAGE

To indicate a requirement in a rule, use *shall* with a person or organization and *must* with an inanimate subject. To indicate a prohibition, use *may not*.

EXAMPLE: The licensee shall record the data in a log.

The data must include the date and purpose of the visit and the visitor's name and affiliation.

The visitor may not enter any high-radiation area.

Always use the plural word *inspectors* unless only one inspector was responsible for the entire inspection period. This is a team effort.

When referring to an inspection report number in the body of a report use the complete title.

EXAMPLE: ...was referenced in Inspection Report 0700123/2002-002.

APPENDIX B

LIST OF ACRONYMS AND INITIALISMS USED IN THIS INSPECTION MANUAL CHAPTER

ADAMS	Agency Document and Management System
AIT	Augmented Inspection Team
BC	Branch Chief
CFR	Code of Federal Regulations
CoC	Certificate of Compliance
DD	Division Director
EA	Enforcement Action
FCNMED	Fuel Cycle Nuclear Materials Event Database
FCSS	Fuel Cycle Safety and Safeguards
FOIA	Freedom of Information Act
GPO	Government Printing Office
IFI	Inspector Follow-up Item
IIT	incident Investigation Team
IMC	Inspection Manual Chapter
IROFS	Items Relied On For Safety
LPR	Licensee Performance Review
MD	Management Directive
NCV	Non-Cited Violation
NMED	Nuclear Materials Event Database
NMSS	Office of Nuclear Material Safety and Safeguards
NOV	Notice of Violation
NRC	Nuclear Regulatory Commission
OD	Office Director
OE	Office of Enforcement
OI	Office of Investigations
PDR	Public Document Room
PI&R	Problem Identification and Resolution
RA	Regional Administrator
SI	International System of Units
SL	Severity Level
TI	Temporary Instruction
URI	Unresolved Item
VIO	Violation

APPENDIX C

EXAMPLE OF NRC 591FF FORM

NRC FORM 591 PART 1 (12-2007) 10 CFR 2.201	U.S. NUCLEAR REGULATORY COMMISSION		
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION			
1. LICENSEE OR CERTIFICATEE/LOCATION INSPECTED: REPORT NO.	2. NRC/REGIONAL OFFICE U. S. Nuclear Regulatory Commission Region II 61 Forsyth Street S.W., Suite 23T85 Atlanta, Georgia 30303-8931		
3. DOCKET NUMBER	4. LICENSE OR CERTIFICATE NUMBER	5. DATE(S) OF INSPECTION	
LICENSEE OR CERTIFICATEE: The inspection was an examination of the activities conducted under your license or certificate as they relate to safety and/or safeguards and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license or certificate. The inspection consisted of selective examinations or procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows: <input type="checkbox"/> 1. Based on the inspection findings, no violations were identified. <input type="checkbox"/> 2. Previous violation(s) closed. <input type="checkbox"/> 3. Reported events reviewed. <input type="checkbox"/> 4. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied. <div style="text-align: center;"> Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s): </div> <input type="checkbox"/> 5. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. <div style="text-align: center;"> (Violations and Corrective Actions) </div>			
LICENSEE OR CERTIFICATEE STATEMENT OF CORRECTIVE ACTIONS FOR ITEM 5, ABOVE			
I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violation(s) identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to the NRC will be required, unless specifically requested.			
TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE/CERTIFICATEE REPRESENTATIVE			
NRC INSPECTOR			

Field Code

DOCKET FILE INFORMATION
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE

2. NRC/REGIONAL OFFICE

REPORT NUMBER(S)

U.S. NUCLEAR REGULATORY COMMISSION
REGION II
61 FORSYTH STREET S.W., SUITE 23T85
ATLANTA, GEORGIA 30303-8931

3. DOCKET NUMBER

4. LICENSE OR CERTIFICATE NUMBER

5. DATE(S) OF INSPECTION

(Continued)

DOCKET FILE INFORMATION
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE OR CERTIFICATEE/LOCATION INSPECTED

2. NRC/REGIONAL OFFICE

REPORT NUMBER(S)

U.S. NUCLEAR REGULATORY COMMISSION
REGION II
61 FORSYTH STREET S.W., SUITE 23T85
ATLANTA, GEORGIA 30303-8931

3. DOCKET NUMBER

4. LICENSE OR CERTIFICATE NUMBER

5. DATE(S) OF INSPECTION

6. INSPECTOR(S):

7. INSPECTION PROCEDURE(S) USED:

EXECUTIVE SUMMARY

ATTACHMENT 1
Revision History for IMC 0616

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	07/29/08 CN 08-021	This new IMC is for the use of FCSS and Region II inspectors. These Offices will no longer use IMC 0610.	No	N/A	ML081640248
N/A	12/21/11 CN 11-042 ML11314A098	Revision to include discussion of the significance of the violation	No	N/A	