

# NRC INSPECTION MANUAL

IRAB

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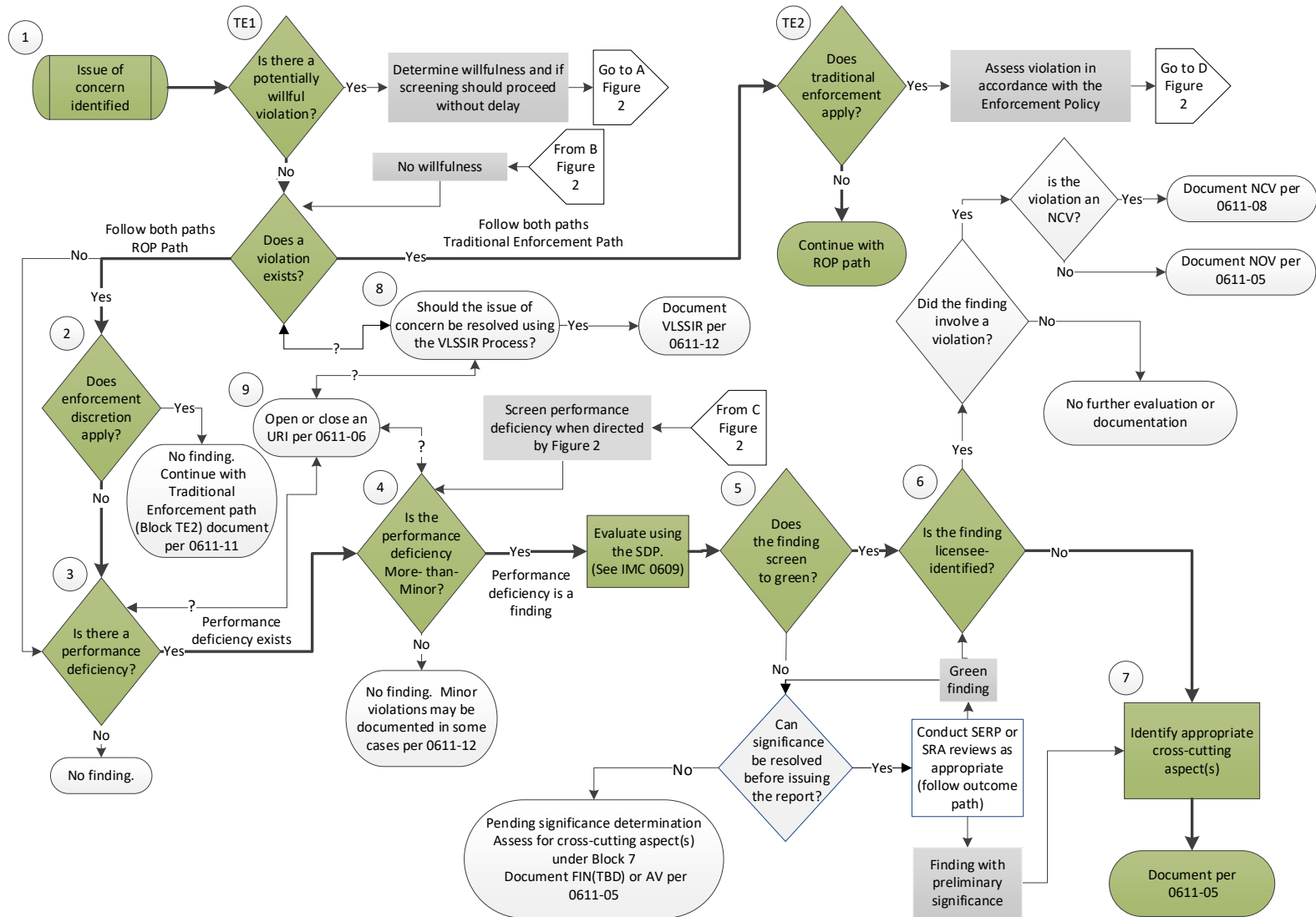
INSPECTION MANUAL CHAPTER 0612 APPENDIX B

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## ISSUE SCREENING DIRECTIONS

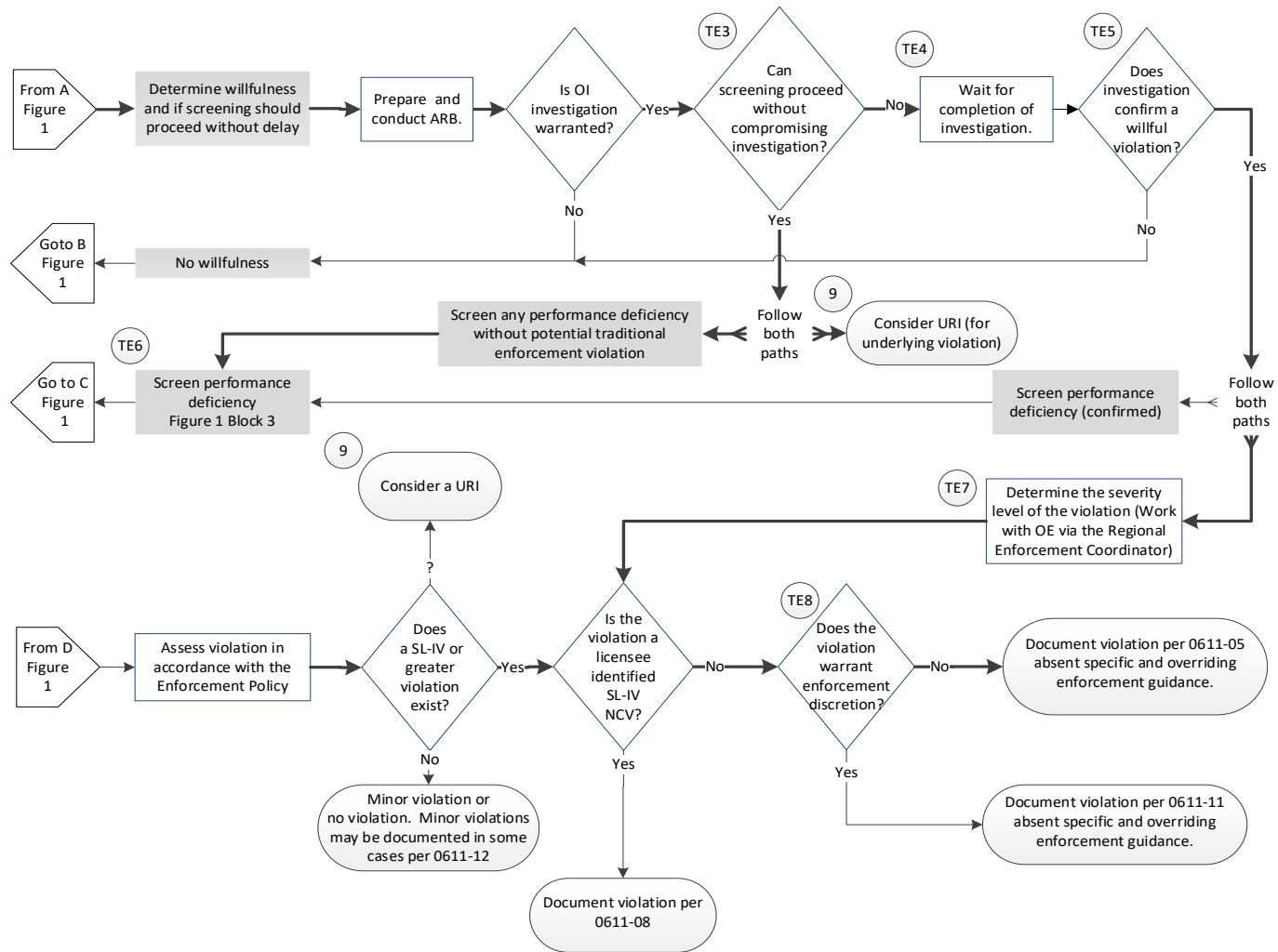
Effective Date: 08/08/2022

Figure 1: Issue Screening



Use IMC 0612 Appendix G, “Emergency Planning Cornerstone - Specific Supplemental Guidance for Appendix B Screening Figures 1 and 2” as a supplement to Appendix B when screening Emergency Planning issues.

Figure 2: Issue Screening (Traditional Enforcement)



Use IMC 0612 Appendix G, “Emergency Planning Cornerstone - Specific Supplemental Guidance for Appendix B Screening Figures 1 and 2” as a supplement to Appendix B when screening Emergency Planning issues.

## Additional Guidance to Clarify Figures

Inspectors will not use the Reactor Oversight Process (ROP) screening process to screen traditional enforcement violations, but will use that process to screen their underlying performance deficiencies if any exist. Inspectors will separate traditional enforcement violations from their underlying performance deficiencies and disposition those traditional enforcement violations using the examples and guidance in the Enforcement Manual and Enforcement Policy.

When dispositioning performance deficiencies associated with traditional enforcement violations, inspectors will not consider the traditional enforcement aspect as part of the ROP performance deficiency.

Figure 1, "Issue Screening"

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Block 1	Issue of concern identified
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An issue of concern is a well-defined observation or collection of observations potentially impacting safety or security which may warrant further inspection, screening, evaluation, or regulatory action. **Issues having greater significance and to a lesser extent involving current licensee performance should be prioritized.**

For issues of concern with multiple examples, inspectors will screen each example separately.

An inspector may identify an issue of concern that is neither a regulatory requirement nor an accepted licensee standard which may warrant consideration under the backfit process due to its perceived impact on safety or security. Inspectors identifying such an issue of concern should raise the concern to management and refer to Management Directive (MD) 8.4, "Management of Backfitting, Forward Fitting, Issue Finality, and Information Requests."

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Block TE1	Is there a potentially willful violation?
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Although inspectors screen issues of concern for indications of potentially willful violations, the determination of willfulness is a legal decision that can only be made by the Office of the General Council (OGC) using facts developed during an investigation conducted by Office of Investigations (OI), normally at the recommendation of the Allegation Review Board (ARB).

See the Enforcement Policy, Enforcement Manual, and Allegation Manual for additional insights involving willfulness. See 10 CFR 50.5 for regulations addressing deliberate misconduct.

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Block TE2	Does traditional enforcement apply?
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If any of the following questions can be answered 'yes', the inspector will compare the violation with examples in the Enforcement Policy to determine if the violation rises to **severity level (SL) IV** or above and thus constitutes a non-minor traditional enforcement violation.

1. Was there a violation that impacted the regulatory process? Examples:
    - Failure to provide complete and accurate information
    - Failure to receive prior NRC approval for changes in licensed activities
    - Failure to notify the NRC of changes in licensed activities
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Block TE2	Does traditional enforcement apply?
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- Failure to perform 10 CFR 50.59 analyses
- Reporting failure, etc.

2. Was there a violation that contributed to actual safety consequences? Examples:

- Actual onsite or offsite releases of radiation exceeding regulatory limits
- Onsite or offsite radiation exposures exceeding regulatory limits
- Accidental criticalities
- Core damage
- Loss of significant safety barriers
- Loss of control of radiological material exceeding regulatory limits for public dose
- Radiological emergencies

3. Is there a SL IV or greater violation with no associated performance deficiency **or is enforcement discretion being exercised?**

Circumstances may arise where enforcement discretion should be considered or exercised to either escalate or mitigate enforcement sanctions or otherwise refrain from taking enforcement action for a particular violation. The Enforcement Policy and Enforcement Manual describe situations where this may apply. Specific circumstances may include:

- Specific cases for which temporary Enforcement Guidance Memoranda prescribes enforcement discretion
- Non-minor violations absent a performance deficiency
- Violations identified during extended shutdowns or work stoppages
- Violations involving old design issues
- Violations identified because of previous enforcement action
- Violations involving certain discrimination issues

Note: Independent spent fuel storage installations (ISFSI), and nuclear materials facilities are not subject to the Significance Determination Process (SDP) and, thus, traditional enforcement will be used for these facilities and their associated license.

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Block 2	Does enforcement discretion apply?
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Violations are considered for enforcement discretion under Enforcement Policy Section 3, "Use of Enforcement Discretion" supplemented by guidance in Enforcement Manual Appendix A, "Temporary Enforcement Guidance" or under Enforcement Policy Section 9, "Interim Enforcement Policies." An enforcement panel is to be conducted for any violation that would be classified greater than Severity Level III or greater than White absent discretion unless specifically authorized by the previously mentioned policy and guidance. Violations receiving enforcement discretion are not assessed under the ROP as performance deficiencies consistent with IMC 0308, Attachment 3.

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Block 3	Is there a performance deficiency?
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The issue of concern is a performance deficiency if the answer to both of the following questions is "yes":

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<b>Block 3</b>	<b>Is there a performance deficiency?</b>
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- Was the issue of concern the result of the licensee's failure to meet a requirement or standard? (A standard includes a self imposed standard such as a voluntary initiative or a standard required by regulation)
- Was the cause of the issue of concern reasonably within the licensee's ability to foresee and correct and should the issue of concern have been prevented?

Notes: (1) The performance deficiency is the proximate cause of the degraded condition and is not the degraded condition. To determine this cause, inspectors need not complete a rigorous root-cause evaluation, but instead may complete an evaluation based on reasonable inspector assessment and judgment.

(2) Inspectors should define a performance deficiency at the level of deficient performance that directly led to the issue of concern. Organizational weaknesses should not be identified as performance deficiencies, but should be considered as the CCA. The impact of an organizational weakness could be a performance deficiency.

(3) Enforcement Manual, Part I, Section 1.3.5, "Documenting Related Violations," discusses grouping closely related violations. Considering this guidance, when an issue of concern caused or resulted in multiple violations, it is appropriate for the performance deficiency to be defined at the problem level, thereby creating a relationship between one performance deficiency and many violations.

When evaluating the licensee's failure to meet a requirement or standard, the inspector should consider the licensee's intent:

- By definition, the licensee intends to meet regulatory requirements, including license conditions and Technical Specifications.
- The inspector can generally conclude the licensee intends to meet standards established in current licensing basis documents. LIC-100, "Control of Licensing Bases for Operating Reactors," provides insights into what documents may constitute current licensing basis.
- Failure to meet an industry standard constitutes a performance deficiency if the licensee intended to meet that standard. Inspectors may reasonably conclude that standards implemented via licensee procedures or as Nuclear Energy Institute (NEI) initiatives committed to by the industry are standards that the licensee intended to meet.
- The inspector should focus on whether the licensee met regulatory requirements in an acceptable manner rather than whether the licensee met the requirements in a manner specifically approved in a generic communication.

<b>Block 4</b>	<b>Is the performance deficiency More-than-Minor?</b>
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If the answer to any of the following questions is "yes," then the performance deficiency is More-than-Minor and is a finding. If the answer to all of the following questions is "no," then the performance deficiency is minor and is not a finding.

- Could the performance deficiency reasonably be viewed as a precursor to a significant event?
- If left uncorrected, would the performance deficiency have the potential to lead to a more significant safety concern?

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<b>Block 4</b>	<b>Is the performance deficiency More-than-Minor?</b>
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- Is the performance deficiency associated with one of the cornerstone attributes listed at the end of this attachment and did the performance deficiency adversely affect the associated cornerstone objective?

Use IMC 0612, Appendix E, “Examples of Minor Issues,” or the Security Issues Forum process to inform answers to the screening questions listed above. See IMC 0612, “Issue Screening,” **Section 5** for additional guidance.

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<b>Block 5</b>	<b>Does the finding screen to Green?</b>
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Inspectors will screen all findings using IMC 0609, Attachment 4, “Phase 1 – Initial Screening and Characterization of Findings” worksheet. Any finding which cannot be determined to be Green will require a Significance Enforcement Review Panel (SERP).

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<b>Block 6</b>	<b>Is the finding licensee-identified?</b>
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Consider the definitions in IMC 0612 when determining whether a finding is licensee-identified, NRC-identified, or self-revealing.

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<b>Block 7</b>	<b>Identify appropriate cross-cutting aspect(s)</b>
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To identify an appropriate cross-cutting aspect for a finding, the inspector will:

- Review applicable causal information related to the finding to identify the cause(s) of the performance deficiency. (To identify causes, inspectors need not perform independent causal evaluations beyond what would be appropriate for the complexity of the issue. For the most-complex issues, inspectors may need to complete informal apparent-cause evaluations.)
- Among those causes, identify the performance characteristic that is either the primary cause of the performance deficiency or the most-significant contributor to it.
- Also, apply additional considerations to determine whether the CCA is reflective of present performance.
- Select the cross-cutting aspect listed in IMC 0310 that best reflects the performance characteristic that is the most significant contributor to the finding (i.e., determine which cross-cutting aspect provides the most meaningful insight into why the finding occurred.) A cross-cutting aspect is a finding characteristic which inversely relates to the reason why the performance deficiency occurred. The cross-cutting aspect is not a finding.

Note that:

- Typically, the staff will assign no more than one cross-cutting aspect to a finding. The regional staff may assign more than one cross-cutting aspect when there are unique or complex inspection findings warranting more than one cross-cutting aspect. Confer with the Reactor Assessment Branch Chief (NRR/DRO/IRAB) prior to assigning more than one cross-cutting aspect to a finding.
  - For a finding to have multiple examples, the same cross-cutting aspect should be associated with each example, consistent with Enforcement Manual Section 2.13.7. (Unless examples have the same cross-cutting aspect, they can't be examples of the same finding.)
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Block 8	Should the issue of concern be resolved using the VLSSIR Process?
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Very Low Safety Significance Issue Resolution (VLSSIR) is a Process used to discontinue inspection, screening, and evaluation of an issue involving only a licensing basis question. Issue screening shall be discontinued and a VLSSIR will be documented in the report when either Criterion 1 or 2 is met:

Criterion 1: The following are met:

- The inspection staff has not been able to conclude that the issue of concern is a violation or licensee standard, as described in Block 2, after considering any licensee provided supporting information on why the issue of concern is not in its licensing basis and any relevant information developed during the inspection process.
- The condition surrounding the issue of concern cannot have any potential to be greater than very low significance (i.e., not greater than Green if the issue was determined to be a finding evaluated using the SDP) **nor greater than Severity Level IV if the issue was determined to be a violation subject to traditional enforcement.**
- The resources required to resolve the current licensing basis question would not effectively and efficiently serve the Agency's mission.

Criterion 2: The issue of concern was evaluated using Office Instruction COM-106, "Technical Assistance Request (TAR) Process" and recommended for no further action because the licensing basis standing is indeterminate and the TAR Safety Significance Determination has determined the issue to be of very low significance **and the issue would not be subject to escalated enforcement if determined to be a violation.**

**Cases may arise where clarification of a requirement through generic processes, interim staff guidance, or other appropriate means may be necessary, outside of inspection and assessment, to address broader safety and regulatory concerns.**

See the TAR Process for further information how to address current licensing basis questions that do not meet the above criteria.

Open URIs may be assessed using the above criteria to determine whether they should be closed using the VLSSIR process.

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Block 9	Open or Close an URI
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Open an Unresolved Item (URI) when an inspection must exit pending receipt of information required to determine one of the following:

- If there is a performance deficiency
- If the performance deficiency is More-than-Minor
- If the issue of concern is a violation

Note: An URI shall not be used to obtain more information in determining the significance of a finding.

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Block 9	Open or Close an URI
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Close an URI when any one of the following conditions are met:

- No performance deficiency exists (e.g., issue of concern being evaluated using MD 8.4, **the associated violation receives enforcement discretion**)
  - The performance deficiency is minor
  - The issue of concern was **resolved using the VLSSIR process**.
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Figure 2. "Issue Screening (Traditional Enforcement)"

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Block TE3	Can ROP screening proceed without compromising investigation?
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Each issue of concern warranting a willfulness investigation triggers a process to determine whether disposition of the associated ROP performance deficiency should proceed without compromising the OI investigation.

Generally, to preclude the possibility of compromising an ongoing willfulness investigation, inspectors should suspend ROP disposition activities that require licensee interaction until the investigation is complete. However, because SDP insights developed during issue dispositioning are integral to dispositioning most traditional enforcement violations, inspectors should disposition ROP performance deficiencies promptly. So, to balance these competing considerations, whenever ROP disposition activities could possibly compromise an ongoing investigation, the Directors (or their designees) of the OI Field Office, DRO, the associated Regional Division of Reactor Projects or Safety, and OE should reach a consensus decision on whether ROP dispositioning should be suspended or may proceed during the investigation. The parties involved in this decision should ensure that their specific concerns are considered in order to achieve the two desired agency outcomes – a valid and defensible ROP finding and a valid and defensible violation within the enforcement program.

If the decision is to suspend ROP dispositioning, then as soon as the investigation is sufficiently complete or whenever new information arises that might otherwise warrant reevaluating that decision, the parties involved in the decision should revisit the decision, and change it if change is warranted.

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Block TE4	Wait for completion of investigation
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This block requires enhanced coordination to preclude the possibility of compromising an ongoing investigation by proceeding prematurely with ROP disposition activities while simultaneously assuring that ROP disposition activities are not delayed inappropriately.

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Block TE5	Does investigation confirm a willful violation?
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In accordance with the Enforcement Policy and Enforcement Manual, OI, upon concluding its investigation, will issue a conclusion about willfulness based on the facts collected/developed during the investigation. Using the facts/conclusion above, OGC will make a final determination about willfulness.

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Block TE6	Screen performance deficiency (Figure 1 Block 3)
<p>The absence of a finding may influence but does not preclude the potential to confirm a willful violation, though it may influence the determination of its severity level and/or civil penalty. Similarly, the presence of a finding does not preclude the potential to confirm no willful violation.</p>	
Block TE7	Confirmed willful violation
<p>Coordinate with the Office of Enforcement through the Regional or Program Office Enforcement Coordinator to disposition violations involving willfulness. See the Enforcement Policy and Enforcement Manual for additional information.</p>	
Block TE8	Does the violation warrant enforcement discretion?
<p>For violations involving enforcement discretion, coordinate actions with the Regional or Program Office Enforcement Coordinator. See the Enforcement Policy and Enforcement Manual for additional information.</p> <p>Some enforcement discretion decisions are made on a case-by-case basis in consultation with the Office of Enforcement, while others may be instituted under a temporary Enforcement Guidance Memorandum or Interim Enforcement Policies.</p>	
Block 9	Consider a URI
<p>See Block 9 for Figure 1</p>	

Cornerstone Objectives and Attribute Tables

Cornerstone	REACTOR SAFETY – Initiating Events
<u>Objective</u>	To limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations.
<u>Attributes</u>	<u>Areas to Measure</u>
Design Control	Initial Design and Plant Modifications
Protection Against External Factors	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Switchyard Activities, Grid Stability
Configuration Control	Shutdown Equipment Lineup, Operating Equipment Lineup
Equipment Performance	Availability, Reliability, Maintenance, Barrier Integrity (SGTR, ISLOCA, LOCA (S,M,L)), Refueling/Fuel Handling Equipment
Procedure Quality	Procedure Adequacy (Maint, Test, Ops)
Human Performance	Human Error

<u>Cornerstone</u>	<u>REACTOR SAFETY – Mitigating Systems</u>
<u>Objective</u>	To ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage).
<u>Attributes</u>	<u>Areas to Measure</u>
Design Control	Initial Design and Plant Modifications
Protection Against External Factors	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Seismic, Weather
Configuration Control	Shutdown Equipment Lineup, Operating Equipment Lineup
Equipment Performance	Availability, Reliability
Procedure Quality	Operating (Post-event) Procedures (AOPs, SOPs, EOPs), Maintenance and Testing (Pre-event) Procedures
Human Performance	Human Error (Post-event), Human Error (Pre-event)

<u>Cornerstone</u>	<u>REACTOR SAFETY – Barrier Integrity</u>
<u>Objective</u>	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.
<u>Attributes</u>	<u>Areas to Measure (to Maintain Functionality of Fuel Cladding)</u>
Design Control	Physics Testing, Core Design Analysis (Thermal Limits, Core Operating Limit Report, Reload Analysis, 10 CFR50.46)
Configuration Control	Reactivity Control (Control Rod Position, Reactor Manipulation, Reactor Control Systems), Primary Chemistry Control, Core Configuration (Loading)
Cladding Performance	Loose Parts (Common Cause Issues), RCS Activity Level
Procedure Quality	Procedures which could impact cladding
Human Performance	Procedure Adherence (FME, Core Loading, Physics Testing, Vessel Assembly, Chemistry, Reactor Manipulation), FME Loose Parts, Common Cause Issues
<u>Attributes</u>	<u>Areas to Measure (to Maintain Functionality of RCS)</u>
Design Control	Plant Modifications
Configuration Control	System Alignment, Primary/Secondary Chemistry
RCS Equipment and Barrier Performance	RCS Leakage, Active Components of Boundary (Valves, Seals), ISI Results
Procedure Quality	Routine OPS/Maintenance Procedures, EOPs and related Off-Normal Procedures invoked by EOPs
Human Performance	Routine OPS/Maintenance Performance, Post Accident or Event Performance

<b>Cornerstone</b>	<b>REACTOR SAFETY – Barrier Integrity</b>
<u>Objective</u>	To provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events.
<u>Attributes</u>	<u>Areas to Measure (to Maintain Functionality of Containment)</u>
Design Control	Plant Modifications, Structural Integrity, Operational Capability
Configuration Control	Containment Boundary Preserved, Containment Design Parameters Maintained
SSC and Barrier Performance	S/G Tube Integrity, ISLOCA Prevention, Containment Isolation, SSC Reliability/Availability, Risk Important Support Systems Function
Procedure Quality	Emergency and Operating Procedures, Risk Important Procedures (OPS, Maintenance, Surveillance)
Human Performance	Post Accident or Event Performance, Routine OPS/Maintenance Performance
<u>Attributes</u>	<u>Areas to Measure (to Maintain Radiological Barrier Functionality of Control Room and Auxiliary Building – PWR, and Standby Gas Trains – BWR only)</u>
Design Control	Plant Modifications, Structural Integrity
Configuration Control	Building Boundaries Preserved
SSC and Barrier Performance	Door, Dampers, Fans, Seals, Instrumentation
Procedure Quality	EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures
Human Performance	Post Accident or Event Performance, Routine OPS/Maintenance Performance
<u>Attributes</u>	<u>Areas to Measure (to Maintain Functionality of Spent Fuel Pool Cooling System)</u>
Design Control	Plant Modifications, Structural Integrity
Configuration Control	System Alignment
SSC Performance	Pumps, Valves, Instrumentation
Procedure Quality	EOPs, Abnormal and Routine Operating Procedures, Surveillance Instructions, Maintenance Procedures
Human Performance	Post Accident or Event Performance, Routine OPS/Maintenance Performance

<u>Cornerstone</u>	<u>REACTOR SAFETY – Emergency Preparedness</u>
<u>Objective</u>	To ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.
<u>Attributes</u>	<u>Areas to Measure</u>
ERO Readiness	Duty Roster, ERO Augmentation System, ERO Augmentation Testing, Training
Facilities and Equipment	ANS Testing, Maintenance Surveillance and Testing of Facilities, Equipment and Communications Systems, Availability of ANS, Use in Drills and Exercises
Procedure Quality	EAL Changes, Plan Changes, Use in Drills and Exercises
ERO Performance	Program Elements Meet 50.47(b) Planning Standards, Actual Event Response, Training, Drills, Exercises
Offsite EP	FEMA Evaluation

<u>Cornerstone</u>	<u>RADIATION SAFETY – Occupational Radiation Safety</u>
<u>Objective</u>	To ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation.
<u>Attributes</u>	<u>Areas to Measure</u>
Plant Facilities/Equipment and Instrumentation	Plant Equipment Instrumentation, (ARM Cals & Availability, Source Term Control), Procedures (Radiation Protection and Maintenance)
Program & Process	Procedures (HPT, Rad Worker, ALARA); Exposure/Contamination Control and Monitoring (Monitoring and RP Controls), ALARA Planning (Management Goals, Measures - Projected Dose)
Human Performance	Training (Contractor HPT Quals, Radiation Worker Training, Proficiency)

<u>Cornerstone</u>	<u>RADIATION SAFETY – Public Radiation Safety</u>
<u>Objective</u>	To ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain as a result of routine civilian nuclear reactor operation.
<u>Attributes</u>	<u>Areas to Measure</u>
Plant Facilities/Equipment and Instrumentation	Process Radiation Monitors (RMS) (Modifications, Calibrations, Reliability, Availability), REMP Equipment, Meteorology Instruments, Transportation Packaging, Procedures (Design/Modifications, Equipment Calculations, Transportation Packages, Counting Labs)
Program & Process	Procedures (Process RMs & REMP, Effluent Measurement QC, Transportation Program, Material Release, Meteorological Program, Dose Estimates), Exposure and Radioactivity Material Monitoring and Control (Projected Offsite Dose, Abnormal Release, DOT Package Radiation Limits, Measured Dose)
Human Performance	Training (Technician Qualifications, Radiation & Chemical Technician Performance)

<u>Cornerstone</u>	<u>SAFEGUARDS – Security</u>
<u>Objective</u>	To provide assurance that the licensee’s security system and material control and accountability program use a defense-in-depth approach and can protect against (1) the design basis threat of radiological sabotage from external and internal threats, and (2) the theft or loss of radiological materials.
<u>Attributes</u>	<u>Areas to Measure</u>
Physical Protection System	Protected Areas (Barriers, Alarms, Assessment), Vital Areas (Barriers, Alarms, Assessment)
Access Authorization	Personnel Screening, Behavior Observations, Fitness for Duty
Access Control	Search, Identification
Response to Contingency Events	Protective Strategy, Implementation of Protective Strategy
Material Control and Accounting	Transportation of Radioactive Material, Records; Procedures, Inventories
Protection of Safeguards Information	Designation and Storage, Processing, Reproduction, and Transmitting, Removal and Destruction
Cyber Security	Protection of Systems and Networks, Cyber Security Program Plan and Procedures

Attachment 1: Revision History for IMC 0612 Appendix B

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	04/29/2002 CN 02-021	IMC 0612 Appendix B removed from IMC 0612 and made a standalone document. Unable to locate original in ADAMS.	No	
	<a href="#">ML0308004200</a> 2/21/2003 CN 03-006	Editorial changes made to reflect title changes to standard ROP terminology. Appendix B was removed as an attachment to IMC-0612 and was issued as stand alone document.	No	
	<a href="#">ML0316106900</a> 6/20/2003 CN 03-021	Revised to achieve the following: 1. Consistency with IMC-0306. 2. Present information in the order in which the activities will normally be performed in the process of developing and transmitting a reactor inspection report. 3. Remove specific enforcement guidance to ensure consistency between the guidance in 0612 and the Enforcement Policy and Manual. 4. Correct incorrect or conflicting information.	No	
	<a href="#">ML051400254</a> 05/19/2005 CN 05-014	Revised to add Question No. 5 to Minor Questions in Section 3 and Question No. 6 to the SDP Questions in Section 4 to reflect the new maintenance risk assessment and risk management SDP, IMC 0609, Appendix K, "Maintenance Rule Risk Assessment and Risk Management."	No	
	<a href="#">ML052700266</a> 09/30/2005 CN 05-028	Revised to clarify the definition of a performance deficiency and a functionality of the control room. Also, the auxiliary building attribute was added to the cornerstone and objective section.	No	
	11/01/2006	Revision history reviewed for the last four years.	No	

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	<a href="#">ML060400499</a> 11/02/2006 CN 06-033	Revised definition of performance deficiency to bring the definition in alignment with the basis for performance deficiency as described in ROP basis document, IMC-0308 attachment 3, "Significance Determination Process Basis Document."	Yes 09/06/2006	<a href="#">ML063000483</a>
	<a href="#">ML071720417</a> 09/20/2007 CN 07-029	Revised flow chart and Section 3 guidance to address feedback forms. Corrected formatting error on page B-7.	No	
	<a href="#">ML082310381</a> 12/04/2008 CN 08-034	Revised Guidance and Flow Chart to be consistent with changes to IMC 0612. Updated Cornerstone Objectives and Attributes to be consistent with IMC 0308.	Yes 12/03/2008	<a href="#">ML083220751</a>
	<a href="#">ML091590496</a> 12/24/2009 CN 09-032	Rewrite Guidance and Flow Charts to: <ol style="list-style-type: none"> <li>1. Implement enhanced Traditional Enforcement (TE) integration in ROP</li> <li>2. Enhance organization and access</li> <li>3. Incorporate IMC 0305 Cross-Cutting Aspect inspection guidance</li> <li>4. Address (in part) the following 0612-related ROP Feedback: <ol style="list-style-type: none"> <li>a. 1303 - enhance App E Maintenance Rule (MR) examples, remove MR specifics from App B</li> <li>b. 1355 –enhance Performance Deficiency guidance (e.g. what constitutes a "standard")</li> <li>c. 1362 - enhance MR minor screening guidance (see 1303)</li> <li>d. 1366 - enhance minor screening guidance for improved consistency</li> </ol> </li> </ol>	Yes 12/10/2009  ID Credit Training ML16154A237	<a href="#">ML091480470</a>



Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
		<ul style="list-style-type: none"> <li>e. 1398 - improve alignment between 0612 and Enforcement Policy (e.g. minor TE Violations)</li> <li>f. 1418 – enhance minor screening guidance to reduce subjectivity per 2008 Consolidated ROP Internal Self-assessment (CRIS-08)</li> <li>g. 1419 - enhance guidance for differentiating self-revealing vs. NRC- vs. License ID per CRIS-08</li> <li>h. 1425 - resolve CCA guidance cross-reference errors</li> </ul> <p>5. Consolidate screening guidance from Section 0612-05 'Screening Inspection Results,' of IMC 0612-proper into Appendix B screening guidance.</p>		
	<a href="#">ML12080A204</a> 09/07/2012 CN 12-020	Complete Reissue. Simplified guidance. Added enforcement discretion path to traditional enforcement.		<a href="#">ML12205A244</a> FF 0612B-1398, 1439, 1483, 1496, 1507, 1591, 1679, 1680, 1683, 1700, 1703
	<a href="#">ML17129A6241</a> 2/13/17 CN 17-029	Editorial update made to reflect the splitting of IMC 0612 into IMC 0611 for documentation and IMC 0612 for issue screening.		
	<a href="#">ML19247C384</a> 12/12/19 CN 19-039	Revised to address feedback forms, ANO Lessons Learned Recommendation 5, and Columbia DPO-2018-001 Recommendation 1. Provides new guidance for the Very Low Safety Significance Issue Resolution (VLSSIR) process (ref: "Low Safety Significance Issue Resolution Working Group Recommendation" memo to Ho K. Nieh, Director Office of Nuclear Reactor Regulation (ML19260G224))		ML19247C918 0612B-1433 ML19220A106 0612B-1436 ML19220A108 0612B-1564 ML19220A109 0612B-1887 ML19220A110

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
				0612B-1929 ML19316A002 0612B-1934 ML19311C610 0612B-1970 ML19220A111 0612B-1997 ML19316A003 0612B-2014 ML19220A112 0612B-2029 ML19316A004 0612B-2203 ML19220A113
	<a href="#">ML20274A209</a> 12/10/20 CN 20-070	Revised to incorporate some changes in Figure 1 to align with IMC 0611. Added clarifying guidance on the concept of licensee ability to foresee and correct, and the definition of performance deficiency in Block 2. Also modified the enforcement bullet in Block 2.		<a href="#">ML20275A010</a> FBF 0612B – 2268 ML19220A114 FBF 0612B-2415 ML20345A168
	<a href="#">ML21203A356</a> 07/23/21 CN 21-026	Clarified the VLSSIR requirements to align with the TAR process and to addressed FBF 0612B-2427. Established URI closure criteria.		ML21116A046 FBF 0612B-2427 ML21113A110

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	ML22019A175 08/08/22 CN 22-016	Updated the VLSSIR and URI consideration and flowchart to clarify that the presence of traditional enforcement (e.g., impeding the regulatory process) does not preclude VLSSIR and URI documentation. Clarified that violations receiving enforcement discretion are not assessed under the ROP, consistent with IMC 0308 Att 3. Removed guidance that was inconsistent with defining the performance deficiency as the proximate cause of the degraded condition, consistent with IMC 0308 Att 3.	Yes Completed on 7/7/22	ML22160A571