

NRC INSPECTION MANUAL

PIMB

MANUAL CHAPTER 0303

ITEM REPORTING

0303-01 PURPOSE

01.01 To establish the objectives, responsibilities, requirements, and procedures for the use and maintenance of the Item Reporting System (IR).

01.02 To provide instructions for the completion, handling and entering of IR data.

0303-02 BACKGROUND

02.01 IR was originally developed as an NRR tool for tracking and managing the follow-up of NRR- and NMSS-identified items at licensed facilities (commercial reactors, nonpower reactors, and materials and fuel cycle facilities) and at NRR vendor facilities. IR interacts with the Inspection Planning System (IP); both IR and IP are components of the Reactor Program System (RPS). IP facilitates the development of inspection plans at commercial reactors. IR captures the results of all inspections and tracks the follow-up of items through completion. IR also tracks the completion status of inspection procedures by inspection report number and contains the data from which the Plant Issues Matrix (PIM) is generated. IR is being modified to capture data from NMSS facilities.

02.02 IR incorporates and replaces the functions of the Inspection Follow-up System (IFS) and the 766 System, which were developed to capture, maintain, and report basic inspection data and enforcement-related findings resulting from inspections of commercial power reactors, nonpower reactors, vendors, and material and fuel facilities. IFS added the capability to track docket-related items that required follow-up, including inspection-related open items, 10 CFR Part 21 reports, and licensee event reports (LERs). IFS also could track items not related to dockets, including administrative items identified by the regional or headquarters offices. Unlike its predecessor systems, IR is programmed on a client server platform that allows the direct entry of data into the system by site, regional office, or headquarters personnel; that is, the system does not require the use of data entry forms or data input personnel.

02.03 The IR Users Guide provides detailed information on entering data, reviewing information, computer screens, and creating and printing reports, including the PIM. Copies of the IR Users Guide are available from the Information Management Branch (PIMB) in NRR and the RPS regional representatives.

0303-03 POLICY AND OBJECTIVES

03.01 Item records of all inspections conducted at commercial power reactors, nonpower reactors, vendors, and materials and fuel cycle facilities will be entered in IR. In addition, all cited violations, non-cited violations, deviations, escalated enforcement items, non-conformance, unresolved items and inspection follow-up items will be tracked in IR. The entry of other open items, including LERs and Part 21 items, is encouraged, although inclusion of these items in IR is optional.

03.02 IR data will also be used by the program offices and regional offices to answer questions that the NRC receives from Congress, the Commission, state officials, interveners, and other interested parties.

03.03 The data entered into IR must be as complete, accurate, and timely as possible. Achieving data accuracy and timeliness will be a shared responsibility of the regional and headquarters offices.

0303-04 DEFINITIONS

04.01 Open item. A matter that requires further inspection. The reason for requiring further inspection may be that the matter has been identified as a noncompliance, unresolved item, or licensee event report.

04.02 Violation (VIO). The failure to comply with a legally binding regulatory requirement, such as a statute, regulation, order, license condition, or technical specification.

04.03 Escalated Enforcement Item (EEI). A Notice of Violation for any Severity Level I, II, or III violation (or problem), or a civil penalty or order based on a violation.

04.04 Deviation (DEV). A licensee's failure to satisfy a regulatory commitment. (This does not apply to operating reactors.)

04.05 Non-Cited Violation (NCV). A violation for which the staff chooses to exercise discretion and refrain from issuing a 10 CFR Part 2.201 Notice of Violation.

04.06 Nonconformance (NON). A vendor's or certificate holder's failure to meet a contract requirement related to NRC activities (e.g., 10 CFR Part 50, Appendix B), where the NRC has not placed the requirement directly on the vendor or certificate holder.

04.07 Unresolved Item (URI). A matter about which more information is required to determine whether the issue in question is an acceptable item, a deviation, a nonconformance, or a violation.

04.08 Enforcement Discretion Letter (EDL). A matter in which the Office of Enforcement has determined to apply enforcement discretion in accordance with Section VII.B.2-6 of the NRC Enforcement Policy.

0303-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Program Offices

- a. Ensure that IR is implemented consistently with NRR and NMSS office policies, programs, and guidance for licensee and vendor facility inspections, enforcement program implementation, and follow-up of issues.
- b. Assure the accuracy and timeliness of the data in IR.
- c. Control access to the system for program office users.
- d. The Information Management Branch (PIMB) in the Office of Nuclear Reactor Regulation is responsible for resolving implementation problems; standardizing procedures, codes, and operating policies; prioritizing system enhancements; updating and issuing the IR Users Guide; and maintaining consistency between IR and the Enforcement Action Tracking System (EATS).
- e. For power reactor inspections conducted by headquarters offices, ensure completed IR data entry information is forwarded to the appropriate regional office for subsequent entry of inspection report data and any open items.
- f. For nonpower and vendor inspections, ensure completed records of all items are entered into IR.

05.02 Regional Offices

- a. Ensure the timely and accurate entry of IR data for all NRC inspections of licensees for which the region is responsible.
- b. Ensure effective management of open items tracked in IR in accordance with regional policies, procedures, and practices.
- c. Ensure complete and accurate entry of enforcement-related open items including notices of violation, non-cited violations, notices of deviation, and escalated enforcement items.

- d. Control access to the system by regional office users.

0303-06 GENERAL REQUIREMENTS AND PROCEDURES

06.01 Data Integrity. Regional and headquarters offices are responsible for ensuring the completeness and accuracy of data tracked in IR. Regional offices shall ensure timely closure of open power reactor items in accordance with established regional instructions. NRR is responsible for the data quality of reactor vendor and nonpower reactor items, while NMSS is responsible for items related to fuel cycle facilities and materials.

06.02 Data Input

- a. The direct entry of data in IR by NRC staff is the preferred vehicle for entering data into IR. If an IR data entry form is used, it should document the completion of each inspection report and associated cited VIOs, NCVs, EEIs, URIs, IFIs, DEVs, EDLs, and NONs. (Other open items may be included at the option of the regional office).
- b. For a team inspection completed by a headquarters office (but not for vendor inspections), disposition of the team's findings may be determined by the cognizant regional division based on input from the headquarters team. The cognizant regional division will prepare the required data input.
- c. NCVs and EDLs should be opened and closed in the same inspection report if no other follow-up is intended.

06.03 Inspection Item Numbering System. For reactor, vendor, and materials inspections, a sequence number is required for each item identified in the inspection report. The system for numbering items in inspection reports shall be as follows:

- a. Each VIO, NCV, EEI, EDL, DEV, URI, NON, and other open items identified in an inspection report will be numbered. The number will provide positive identification of items to be followed up and closed in future inspections.

For all licensed facilities, the number for open items identified in an inspection report will consist of the type of item followed by the last three digits of the docket number, a "/", the inspection report number, a "-", and a sequence number (e.g., VIO 05000346/1997001-01).

- b. The sequence number will start with 01 at the beginning of the report for the first item identified. Each new item identified on subsequent pages will be numbered in sequence, regardless of type. In a report covering only one unit, each item will be tracked separately. Items common to two or more units will have the same sequence number for each unit; the docket number and the associated inspection report number will distinguish the unit to which the open item applies. A sequence number may never be reused, even for items of different units.

The following are examples of proper numbering for single and dual unit sites:

<u>REMARKS</u>	<u>ITEM</u>	<u>DOCKET</u>	<u>REPORT</u>	<u>S</u>	<u>E</u>	<u>Q</u>	<u>U</u>	<u>E</u>	<u>N</u>	<u>C</u>	<u>E</u>
	<u>Single Unit Site:</u>										
01	1st VIO	05000346		1	9	9	1	0	0	1	
	1st URI	05000346	1991001					02			
	2nd VIO	05000346	1991001					03			
	1st DEV	05000346	1991001					04			
	<u>Dual Unit Site:</u>										
	1st URI	05000295	1991002					01	1st unit	1	
	2nd URI	05000304	1991002					02	1st unit	2	
	1st DEV	05000295	1991002					03	both units		
		05000304	1991002					03			
	2nd DEV	05000295	1991002					04			
both units	1st VIO	05000295	1991002							0	5
		05000304	1991002					05			

- c. URIs that are later determined to be VIOs will be given a new number based upon the current inspection report. The old item will be closed in the inspection report.

06.04 Title Field Entry. Describe the open item in 80 characters or less. This entry will also appear in the PIM as the "Title."

06.05 Text Field Entry. For non-enforcement items, the text field may be used for additional pertinent information that they did not include in the title field. For a VIO, NCV, EEI, EDL, DEV, or NON, they should make an entry in the text field. The text should include the pertinent requirement and a concise (3-5 lines) summary of the violation, deviation, or nonconformance. The following are examples of acceptable text field entries:

- a. Contrary to TS 3.6.6.1 on January 1, 1992, with one drywell and suppression chamber hydrogen combiner having been inoperable for more than 30 days, the unit was not placed in Hot Shutdown within the next 12 hours.
- b. Contrary to 10 CFR 50.59(a) on May 1, 1991, the licensee changed the facility as described in the FSAR without evaluating the change. Specifically, the service water system discharge, which as stated in Section 10.6.5 of the FSAR, normally empties into the circulating water discharge structure, was diverted permanently to the cooling tower basin.

06.06 Data Entry. In general, data may be entered by the resident office assistant for that site's IR records and items. However, it is the responsibility of the region to determine how

and by whom: items will be created, records will be updated, data integrity will be assured, and the PIM will be generated.

06.07 EEIs and the IR Interface With the Enforcement Action Tracking System (EATS). EATS does not share data with IR; however, information can be correlated between the two systems through the Enforcement Action (EA) Number. EEIs serve as place holders in IR until a final decision is reached on the appropriate enforcement action for the issues. EEIs can be disposed of by regional and headquarters enforcement staff as follows:

- a. EEIs are created in IR by regional staff with an item status of "0" (open). The EA number, assigned by the Office of Enforcement (OE), should be entered. The same EA number is used by OE in EATS.
- b. OE reviews the items. If OE and the region determine that an item is not a violation, then the regional staff will change the status for the corresponding EEI in IR to "W" (withdrawn). Should the region elect to continue to follow up on the issue, a new item with the appropriate type code must be opened.
- c. If OE and the region determine that items are violations, when they issue the notice of violation the regional staff will create new items in IR using the identification numbers in the notice and assign an item type of "VIO." The status of the original EEIs in IR should be changed to "C" (closed), and both the original EEIs and new VIOs should reference the EA number originally assigned.
- d. For an EEI to which enforcement discretion is applied, the EEI should be closed with the opening of an EDL. The EDL would be simultaneously closed if no follow up is intended.

06.08 Procedure Status. The report lead for each inspection report is responsible for ensuring that the status of each procedure used in the inspection is entered in IR at the completion of the inspection. The screen for Procedure Status can be found under the Reports Tab of IR. The regional offices will develop business rules to accomplish this task.

06.09 Plant Issues Matrix (PIM). Selection of specific item types automatically defaults to the PIM; these items are as follows: Escalated Enforcement Item, Non-Cited Violation, Unresolved Issue, Violation, Licensing Issue, and Other. However, IR is flexible to permit changes to the default selection. Under the Text Tab, the user will enter text for the PIM from the Executive Summary of the inspection report and a discussion of the significance of the item. Both the description and the significance statements should be short and be able to stand alone. In the ideal instance, the user will copy and paste directly from the inspection report's Executive Summary; however, the application does allow the modification of text from the Executive Summary. Users are cautioned not to extensively modify text from the inspection report, thereby reducing traceability from the PIM back to the inspection report.

The PIM report is produced by selecting the Reports Tab and selecting the PIM report. The user can select the site, the type of item (or all items), a date range, and can sort the data by Functional Area, Dates, Type, or Template Code; the default sort is by Primary Functional Area.

06.10 Security Considerations

- a. System access shall be controlled via the RPS/Security Access System security system to ensure that entry and update capabilities are restricted only to authorized personnel.
- b. The IR database also contains pre-decisional information relating to evaluations of EEIs. System confidentiality is necessary to prevent inappropriate disclosure of this type of information. Provisions for controlling access to information found in the IR database are found in The Privacy Act of 1974, 5 USC 552a, and in NRC's regulations found in 10 CFR Part 9.
- c. Proprietary data, security information, and other sensitive or sensitive unclassified information should, to the extent possible, be excluded from the IR database. Reference to an allegation or an allegor is to be strictly avoided.

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