

**Republic of the Philippines**  
**PHILIPPINE NUCLEAR RESEARCH INSTITUTE**  
**Department of Science and Technology**  
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**NRLSD BULLETIN NO. 93-03**

**THE TWENTY-FIVE-DAY TIME PERIOD TO  
RESPOND TO AN INSPECTION REPORT OR  
NOTICE OF VIOLATION**

**A. ADDRESSEES**

All licensees using radioactive materials.

**B. PURPOSE**

This bulletin intends to inform the licensees on the rationale behind the twenty-five (25) working days time period within which they are required to respond to an Inspection Report or a Notice of Violation.

**C. DESCRIPTION OF CIRCUMSTANCES**

It has been found that a number of licensees do not observe the required **twenty-five (25)-day** period within which the licensee should respond to an **Inspection Report or a Notice of Violation**. Because of the delay in the licensee's response, the desired prompt corrective actions to significant inspection findings can not be verified in a timely manner. Non-adherence to the required reporting or responding period does not augur well towards adequate and prompt compliance with regulations and license conditions. Recognizing the situation of the country's postal services, the Institute considers a period of twenty-five working days from date of receipt of report to be adequate for the licensee to respond to an Inspection Report or Notice of Violation.

**D. DISCUSSION**

Upon completion of an inspection or audit of a licensed facility, PNRI inspectors provide the licensee an unofficial preliminary report of inspection findings at the exit meeting with the licensee management.

An official **Inspection Report** is sent to the licensee after the IE/NRLSD completes its evaluation. If the Institute determines that a licensee has violated the regulations or the conditions of his license to the extent that public safety is endangered, the Institute issues a **"Notice of Violation"** to the licensee. Under these two circumstances, the licensee is given twenty-five (25) working days from date of receipt of report or notice to respond to the Institute, accordingly.

The Institute, as a matter of regulatory policy, requires licensees to respond promptly to communications that address nuclear safety and protection of the public. In the response, the licensee is expected to indicate what corrective action had been taken or planned to be taken to correct the violation, the steps taken to prevent the recurrence of such violation, and the time schedule for completion of corrective and preventive actions. If for some reasons the licensee cannot implement the necessary corrective actions, then the Institute should be notified immediately for further investigation and possible alternative action. A licensee who disagrees with the correctness of an inspection finding should state so in his response giving an explanation for his disagreement. Such explanation should include relevant data, detailed calculations and/or facts to support any differences in the adequacy of the inspection finding.

If the licensee fails to respond within the required time period, then the Institute assumes that the licensee has not taken any corrective action or the licensee deliberately ignored or violated the regulations of the Institute. Willful violation of the Institute rules, regulations or orders subjects the license to revocation, suspension, or modification in whole or in part, as stipulated in **Section 41(b) of CPR Part 2** depending on the safety significance of the findings.

## **E. REQUIRED LICENSEE ACTION**

Licensees are required to strictly comply to the requirement stated in this bulletin. We appreciate any written response to this bulletin that may affect your licensed activities.

If there are questions regarding this matter, please contact:

**OSROXZON L. AMPARO**

Head, Standards Development Section  
Nuclear Regulations, Licensing, and Safeguards  
Division

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