

NRC INSPECTION MANUAL

PART 9900: TECHNICAL GUIDANCE

RG133.TG

REGULATORY GUIDE 1.33 "PROCEDURE IMPLEMENTATION" AS USED IN SECTION 6.8.1 OF STANDARD TECHNICAL SPECIFICATIONS

A. PURPOSE

The purpose of this guidance is to provide the NRC position concerning adherence to procedures developed for safety related activities at Nuclear Power Plants.

B. DISCUSSION

10 CFR 50.36(c)(5) requires licensees to develop Technical Specifications which describe the Administrative Controls necessary to assure operation of the facility in a safe manner. Paragraph 50.36(c)(5) defines Administrative Controls as those provisions relating to organization and management, procedures, recordkeeping, review and audit and reporting functions.

10 CFR 50.34(b)(6)(ii) requires licensees to describe in the final Safety Analysis Report those managerial and Administrative Controls to be used to assure safe operation. Paragraph 50.34(b)(6)(ii) states that Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and for Reprocessing Plants", sets forth the requirements for such controls for nuclear power plants.

Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Revision 1, January 1977 clarifies the NRC staff position regarding ANSI N18.7-1976, endorses it with several exceptions and states that it requires the preparation of many procedures to carry out an effective Quality Assurance Program. R.G. 1.33 also states that its Appendix A should be used as guidance to ensure minimum procedure coverage for plant operating activities, including maintenance activities.

The Administrative Control Section of the Standard Technical Specifications, Section 6.8.1 states that written procedures shall be established, implemented and maintained for activities which include applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33. NRR and IE interpret the term "implemented" as used in Section 6.8.1 to mean "adhered to." It is also interesting to note that ANSI N18.7-1976, Section 5.2.2 Procedure

Adherence, states that procedures shall be followed and that the requirements for use of procedures shall be prescribed in writing.

The term "adhered to" means that the actions prescribed by the procedure must be accomplished, it does not mean that the operator, technician or engineer must

have a copy of the procedure in hand and sign off each step as the function is performed.

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