From: Thomas Cox
To: Btm1
Date: Tue, Jan 30, 2001 11:16 AM
Subject: 70.62 ISA Plan guidance to go on the web

Attached is a file containing that which should be placed on the web ASAP.

The introductory remarks could be something like:

The NRC is issuing guidance for licensees to use in responding to the revised Part 70 requirement at section 70.62 (c)(3)(i), concerning licensee's plan to produce an ISA Summary. Licensee's response to this requirement is due by April 18, 2001.

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Subject: 70.62 ISA Plan guidance to go on the web
Creation Date: Tue, Jan 30, 2001 11:16 AM
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Files	Size	Date & Time
70_62 ISA Plan guidance 1 30 01.wpd	11106	Tuesday, January 30, 2001 11:09 AM
MESSAGE	993	Tuesday, January 30, 2001 11:16 AM

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Expiration Date:	None
Priority:	Standard
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NRC Guidance for Licensees Regarding Part 70, Section 70.62(c)(3)(i)

The Requirement:

"By April 18, 2001, submit for NRC approval, a plan that describes the integrated safety analysis approach that will be used, the processes that will be analyzed, and the schedule for completing the analysis of each process".

Analysis and Guidance:

This requirement pertains to the applicant's plan for completion of an integrated safety analysis as described in 70.62(c). This guidance will be consistent with that provided in the staff's Fuel Cycle Standard Review Plan (SRP) Chapter 3, "Integrated Safety Analysis (ISA)".

The ISA plan (IP) shall be submitted in accordance with 70.5 and 70.21, as applicable. Additional detail on filing standards is found in the SRP, Appendix, "Filing Standards for Submittals."

The staff's review of the IP will focus primarily on the three requirements for descriptive information specified in 70.62(c)(3)(i).

Acceptance Criteria:

The applicant's descriptions pursuant to 10 CFR 70, Section 70.62(c)(3)(i)will be acceptable if they meet the following criteria:

1. The applicant describes its plan for selecting and training a team of personnel qualified to conduct the ISA and to construct an ISA Summary, in accordance with 70.62(c)(2) and with Chapter 3 of the SRP.

2. The applicant describes its plans to identify all hazards associated with or derived from the possession and use of special nuclear material (SNM), in accordance with 70.62(c)(1)(i), (ii), and (iii), and Chapter 3 of the SRP.

3. The applicant describes its plans to identify and describe all potential accident sequences in accordance with 70.62(c)(1)(iv) and Chapter 3 of the SRP.

4. The applicant describes its plans to identify the consequence and likelihood of each potential accident sequence, and the methods used to determine those consequences and likelihoods, in accordance with 70.62(c)(1)(v) and Chapter 3 of the SRP. Any primary guidance documents to be used, such as NUREG/CR-6410 "Nuclear Fuel Cycle Facility Accident Analysis Handbook," should be referenced in the IP.

5. The applicant describes its plan to identify each item relied on for safety (IROFS) that is designed to contribute to meeting the performance requirements of 70.61, its safety characteristics, and the assumptions

and conditions of its use, in accordance with 70.62(c)(1)(vi) and Chapter 3 of the SRP.

6. The applicant describes its plan for an integrated format for assembling the information described above into an ISA Summary document, or several documents, that provide(s) reasonable assurance that the requirements of 70.61 are met. Chapter 3 of the SRP, Appendix A "Example Procedure for Risk Evaluation" describes an acceptable format.

7. The applicant provides a list of all processes that will be analyzed, and identifies, for each process, the smallest and largest integral portion of the process that will be analyzed as a unit to identify potential accident sequences and IROFS. For example, it is assumed that the most common smallest unit to be analyzed will be a workstation, most frequently a glovebox or similar unit.

8. The applicant provides a schedule showing the planned completion of analyses for each process, and the expected submittal date for the final ISA Summary and each additional ISA Summary, if more than one is planned. A Gantt chart would be useful to convey this information. It is recommended that, in order to facilitate efficient use of resources of both the staff and applicant, several ISA Summary documents be submitted over the period between April 18, 2001 and October 18, 2004. The final ISA Summary would then address any additional potential accident sequences identified due to interaction of one process with another that was separately analyzed. Such interactions might occur as the result of external events (e.g., meteorological or seismic) or internal events (e.g., fire, internal flooding).