



In the License

- **Programmatic Conditions**
 - For each area of safety programmatic conditions are established which by design assure the safe handling of the nuclear material
 - These conditions can only be changed with NRC approval
 - Licensee can not process, handle or do any work with the nuclear material if it is outside the scope of the programmatic conditions



In the ISA and ISA Summary

- **Integrated Safety Analysis**
 - Provides the review of the handling of the nuclear materials to assure that; it is within the programmatic requirements, the emphasis of the safety program(s) is appropriate for the risk, and the measures for carrying out the safety program(s) are appropriately monitored
- **Integrated Safety Analysis Summary**
 - Provides a high level summary of the ISA focusing on the high risk areas along with a table of the key items relied on for safety and demonstrating that the performance requirements of Part 70 are satisfied



Practice of NCS

- Technical Issues of Concern
 - criticality code
 - acceptable codes
 - use of default values vs. plant-specific data
 - validation of methods
 - application of different codes for differing conditions
 - allowable k_{eff} margin

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Practice of NCS

- Other Issues:
 - risk indexing
 - criticality accident enabling event – is an IROFS?
 - favorable geometry equipment and dimensional characteristics – IROFS?
 - independence of administrative controls – degree of operator independence (common mode failure vs. independence when different steps are performed at different times)

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Criticality Regulations

- Regulatory Guides
- Consensus Standards

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Double Contingency Principle

- Equality with 'highly unlikely'?
 - Double contingency = highly unlikely
 - Execution of the ISA should validate this (ISG)


