

NRC INSPECTION MANUAL

RNRP

INSPECTION PROCEDURE 69002

CLASS III RESEARCH AND TEST REACTORS

PROGRAM APPLICABILITY: 2545

69002-01 INSPECTION OBJECTIVE

To determine if activities at Class III research and test reactors were conducted safely and in accordance with regulatory requirements and licensee commitments, since the last inspection.

69002-02 INSPECTION REQUIREMENTS

02.01 Staffing and Audits. Determine if required staffing was maintained and that required audits were conducted in accordance with the technical specifications (TS) requirements.

02.02 Operator Requalification and Active License Status. Determine if the requalification records were maintained as required by the licensee's NRR-approved requalification training program and that operators have continued to maintain active license status.

02.03 Radiological Surveys. Determine if required radiological surveys are performed in accordance with approved licensee procedures.

02.04 Surveillance. Determine if surveillance activities were completed as required by technical specifications.

02.05 Emergency Preparedness

- a. Determine if the licensee completed emergency preparedness exercises and drills as required by the emergency plan.
- b. Determine if the licensee has completed emergency preparedness training in accordance with the emergency plan commitments.

General Guidance

This procedure applies to Class III research and test reactors. It includes inspection of reactors in a long-term shutdown status or with a possession only license. If the licensee is conducting activities, such as, fuel movements, maintenance, or a major modification, with the intent of starting up operations, this procedure should not be applied. That is, a facility shall be considered to be in an operating status if the work associated with the reactor is the reason for it being shutdown, e.g., refueling, design changes, or testing. For facilities in operating status, the applicable Class I or II research and test reactor inspection procedures should be used.

If safety concerns are identified as a result of this inspection, the inspector may determine that additional inspection is warranted. If the facility operated for several months and was then shut down with the intention of remaining in long-term shutdown, the inspector may conclude that additional inspection is also needed to assess safety significant events or conditions. If additional inspection is needed, the inspector should consult appropriate management and the NRR project manager to establish the extent of inspection effort to be applied. If in this consultation it is determined that additional inspection activity is needed, the inspector should use applicable portions of the procedures specified in Inspection Manual Chapter 2545.

The inspector should establish through TS review all shutdown requirements before conducting the inspection. If the TS do not allow the flexibility to suspend unnecessary items until needed, the licensee may request a TS change through NRR.

General guidance may be found in the ANSI/ANS Section 15 Standards. Additional general guidance may be found in the Division 2 Regulatory Guides, and the "Other Regulatory Guides of Possible Interest to Division 2 Recipients" attached to the Division 2 Regulatory Guides Table of Contents. The reference to this guidance is to aid the inspector in technical evaluation of licensee programs and is not to be used as requirements on the license unless the licensee has committed in writing to use the specific guidance document.

Whenever practical, the inspector should observe actual work in progress, such as changes in required functions due to maintenance or design change activities during long-term shutdown conditions.

The sample sizes and resource estimates suggested in the inspection procedure is provided for broad planning purposes and to define the typical depth of the inspection. It is not intended to be a rigid requirement on the inspector. Actual inspection at any facility may require more or less effort depending on past inspection history, conditions at the facility, and safety significance.

Specific Guidance

03.01 Staffing and Audits. Requirements for facility staffing and the conduct of licensee audits may be found in the Administrative Section of the TS. Audits should include review

of major maintenance or design change activities by management and the safety review committee.

03.02 Operator Requalification and Active License Status. The verification of records for two operators should be an acceptable sample for this inspection requirement. These records should verify that the licensee has continued to meet the requirements of the NRR-approved requalification training program.

If the facility is in a long-term shutdown, the licensee should understand that the facility operators must satisfy the requirements of the requalification program and 10 CFR 55.53(e) in order to maintain an active license. The requirement for maintaining an active operator license is independent of plant status. Operator duties to comply with active license status requirements do not solely relate to operating the reactor, but can be considered to include other reactor related activities that apply to the specific condition of the reactor facility, such as, reactor checkouts and fuel movement. If the provisions of 10 CFR 55.53(e) can not be satisfied, the facility is required to meet those of 10 CFR 55.53(f). If none of these requirements can be met, a specific exemption should be pursued by the licensee as specified in 10 CFR 55.11. The inspector should ensure that the licensee understands these requirements.

If the facility is not to return to reactor operations and all fuel has been removed from the facility, there may be no need to maintain the requalification plan. The licensee should request exemption from NRR before they discontinue implementation of the operator requalification plan. If the licensee has not met operator requalification plan requirements, the inspector should discuss this problem with appropriate management and the NRR project manager.

03.03 Radiological Surveys. The observation of one radiation and contamination survey, and radiological control area exit survey should provide an acceptable sample for this inspection requirement. The licensee's procedures for routine surveys may require personnel to perform such actions as checking sealed sources for rupture or checking for the spread of contamination from irradiated material from either the core or experiments. If it is not practical to observe surveys, the inspector should perform independent surveys of several areas using either NRC or licensee survey instruments. The results of the inspector's survey should be comparable with the most recent licensee surveys.

03.04 Surveillance. The verification of records for two TS required surveillances should provide an acceptable sample for this inspection requirement. The activities to satisfy inspection requirement 02.03, above, may suffice for one surveillance verification if the survey was required by the TS.

03.05 Emergency Preparedness. If the facility is not to return to reactor operations and all fuel has been removed from the facility, there may no need to maintain the emergency plan. The licensee should request exemption from NRR before they discontinue implementation of the plan.

- a. Verification of the conduct of the last required emergency exercise or drill should provide an acceptable sample for this inspection requirement. Emergency

preparedness exercises and drills that the licensee is required to conduct may be found in the facility specific emergency plan.

- b. Verification of training for two persons with emergency response responsibilities should provide an acceptable sample for this inspection requirement. Individuals with emergency response responsibilities should have participated in an exercise or drill and training as required by the emergency plan and operator requalification plan.

69002-04 RESOURCE ESTIMATE

For planning purposes, the direct inspection effort to complete this inspection procedure is estimated to be 16 hours.

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