



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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ARLINGTON, TEXAS 76011-4005

November 29, 2004

MEMORANDUM TO: Stuart A. Richards, Chief  
Inspection Program Branch  
Division of Inspection Program Management

FROM: Thomas P. Gwynn /RA/  
Deputy Regional Administrator

SUBJECT: INSPECTION MANUAL DOCUMENTS FOR COMMENT

In response to your memo dated October 28, 2004, Region IV reviewed the referenced documents. The following are the Region's resultant comments to that review:

**IMC 0040 - "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual"**  
**(ML042940289)**

Comments

1. The DIF form does not address from where resources are to be allocated (i.e., Headquarters or the Region).
2. The DIF should provide information on the technical guidance considered, including references to applicable OE, and identify how the OE can be obtained.

**IMC 0801 - "Feedback Process" (ML042940333)**

Comments

3. Section 04.07 does not require the lead reviewer to interface directly with the originator of the feedback form. This should be a requirement in order to ensure the originator's comments and questions are clearly understood before the reviewer formulates a response.
4. Section 05.01, paragraph b.1(f), states that the IIPB feedback coordinator will electronically forward updates to the originator . . . There is no requirement to provide feedback form status updates.
5. Section 05.01, Paragraph b.2(b), requires the lead reviewer to contact the originator "as needed" for clarification of the feedback form. This should not be optional; the reviewer should be required to contact the originator in all cases to ensure a common understanding of the concern.

6. Section 05.01 does not require the lead reviewer to provide a status update on the feedback form (see Comment 3). There should be a requirement for regular status updates every 30 days until the feedback form is closed.

**IP 71002 - "License Renewal Inspection" (ML042940351)**

Comments

No comments

**IP 71003 - "Post-Approval Site Inspection for License Renewal" (ML04290486)**

Comments

No comments

**IP 92709 - Licensee Strike Contingency Plans" (ML042940477)**

Comments

1. Pages 4 and 5 reference Regulatory Guide 5.54, "Standards Format and Content of Safeguards Contingency Plans for Nuclear Power Plants," March 1978. It is our staff's understanding that this regulatory guide became obsolete on October 29, 2004, as a result of agency orders to nuclear power plant operators.
2. The resource estimates for IPs 92709 and 92711 do not appear to be sufficient for the inspection requirements listed. For example, IP 92711, 03.01 recommends 24-hour site coverage during the licensee's transition from licensed operators to replacement workers, yet the resource estimate for this procedure is 4 hours. In addition, Region IV believes a better estimate for IP 92709 is 40-50 hours.
3. Section 03.08 has a typographical error: ". . . in no wise."

**IP 92711 - "Continued Implementation of Strike Plans During an Extended Strike" (ML042940492)**

Comment

See Comment 2 for IP 92709.

**IMC 0305 - "Operating Reactor Assessment Program" (ML042940499)**

Comments

1. In Section 06.01, recommend deleting sentence "For integrated inspection reports, this date should be March 31, June 30, September 30, or December 31, regardless of when the exit meeting was conducted," to be consistent with the wording in Section 06.06.c.

2. Sections 06.02.c and 06.02.d indicate that the midcycle and end-of-cycle reviews include consideration of the conclusions of any independent assessments, such as INPO and OSART inspections. It is not clear how to incorporate these assessments into the ROP. Further guidance is needed.
3. In Section 06.06, Subsection "h" is shown as "H."
4. The last paragraph in Subsection I.2, of Section 06.06 needs clarification. Subsection I.2 states that the causal factors have a common theme. To assist in determining whether there is a substantive crosscutting issue, it then defines subcategories of two of the crosscutting areas. What is unclear is whether a theme must be present in examples from the same subcategory.
5. Exhibit 4 should be modified to include the schedule for completion of public meetings with licensees in the licensee response or regulatory response columns (within 6 months after annual assessment letter issuance) and to clearly indicate that the 16 weeks after the end of the fourth quarter requirement applies only to plants in other columns.

**IMC 2515 - "Light Water Reactor Inspection Program" (ML042940520)**

Comments

In Section 04.07, second paragraph, ". . . and presumes that at least the minimum inspection requirements will otherwise be completed as soon as possible within the quarter immediately following the annual inspection cycle." The sentence is confusing. Recommend rewording to more clearly state what is believed to be intended: ". . . attachment to not be completed. The minimum inspection requirements not previously completed shall be completed as soon as possible in the quarter following the annual inspection cycle in which the minimum inspection requirements were not met."

If there are some consequences to not completing them at that time, that should also be stated.

**IMC 2516 - "Policy and Guidance for the License Renewal Inspection Program" (ML042940539)**

Comment

No comments

ADAMS: / Yes  No Initials: \_\_RVA\_\_  
/ Publicly Available  Non-Publicly Available  Sensitive / Non-Sensitive

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