

Review of Operational Programs in a Combined License Application



**NRC/NEI Public Meeting
February 2, 2005**

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Agenda

- Background
- Key Challenges
- Proposed Approach for Combined License Operational Program Review (COL OPR)
- Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria (EP ITAAC)
- Current Status of Response to SRM-SECY-04-0032
- Industry Interactions
- NRC's Initial Thoughts on COL OPR
 - Fire Protection
 - Inservice Inspection (ISI) and Inservice Testing (IST)

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Background

- Operational Programs Included in SECY-02-0067
 - Originally identified in NEI letter dated May 14, 2001
 - Emergency Planning
 - Quality Assurance
 - Radiation Protection
 - Fitness for Duty
 - Licensed Operator
 - Containment Leak Rate Testing
 - Inservice Inspection and Inservice Testing
 - Physical Security
 - Fire Protection
 - Access Authorization
 - Training
 - Reportability
 - Maintenance Rule
 - Equipment Qualification
- SRM-SECY-02-0067 endorsed ITAAC for EP



Background (continued)

- SRM-SECY-02-0067 stated the following:
 - Although the NRC inspection process does not replace a particular ITAAC, an ITAAC should not be necessary if the program and its implementation are **fully described [emphasis added]**
- SRM-SECY-04-0032 provided additional clarification:
 - ... 'fully described' should be understood to mean that the program is clearly and sufficiently described in terms of the scope and level of detail to allow a reasonable assurance finding of acceptability. Required programs should always be described at a functional level and at an increased level of detail where implementation choices could materially and negatively affect the program effectiveness and acceptability.



Key Challenges

- How does the NRC find an operational program described in a COL application acceptable without the program being fully developed and implemented?
 - ▶ What is the information needed for staff to make this finding?
 - ▶ Is there any need for license conditions, or in rare instances, ITAAC?



Proposed Approach for Combined License Operational Program Review

- COL application would contain the following related to operational programs:
 - ▶ Final Safety Analysis Report (FSAR) level information
 - ▶ Additional information for operational programs where implementation choices could materially and negatively affect the program effectiveness and acceptability
 - ▶ Discussion of the applicant's implementation plans, including schedule
- NRC final safety evaluation report (FSER) to include staff evaluation of operational programs
- COL to include, where necessary, license conditions of implementation of operational programs, as described in the FSAR that will not be implemented at the time the COL is issued



Proposed Approach for Combined License Operational Program Review (cont.)

- Approach consistent with current process of including license conditions in renewed operating licenses
- Approach consistent with process envisioned for addressing COL action items contained in design certification and early site permit FSERs not implemented prior to issuance of COL
- Approach assumes that operational programs do not need ITAAC unless the staff determines that an implementation issue is inseparable from the finding on program acceptability, and an ITAAC is necessary
- COL applicants may propose ITAAC for any operational program in lieu of fully describing the program in the COL application

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Emergency Planning ITAAC

- ITAAC have been drafted for EP
- Final results of EP ITAAC for COL will be included in SECY paper responding to SRM-SECY-04-0032

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Current Status of Response to SRM- SECY-04-0032

- NRC staff is collecting and developing information for all operational programs listed in SECY-02-0067
- Information to be included in SECY paper submitted to Commission prior to December 31, 2005

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Industry Interactions

- Discussed approach in public meeting with NEI on November 9, 2004
 - ▶ NEI voiced no objections to approach and stated that schedule is consistent with completion of NEI 04-01
- Today's meeting to discuss NRC's initial thoughts on information needed for the following operational program reviews
 - ▶ Fire Protection
 - ▶ Inservice Inspection and Testing
- Plan to discuss all operational programs in public meetings with NEI prior to completion of SECY paper

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Initial Thoughts on NRC COL OPR

- Discussions intended to inform the NRC and NEI
- NRC staff will present initial thoughts on specific operational program
- Solicit from NEI:
 - Availability of information during the review of a COL application
 - Expected implementation of the operational program

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NRC COL OPR

Fire Protection

- Governing Implementation Regulation
 - (1) 10 CFR 50.48
 - (2) Appendix A to 10 CFR Part 50, GDC 3
- Applicable Standard Review Plan
 - 9.5.1 Fire Protection Program
- Information included in COL Application
 - COL Application
 - Fire protection plan and discussion of its implementation
 - FSAR
 - Describe fire protection plan required by 10 CFR 50.48(a)

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NRC COL OPR

Fire Protection (Continued)

■ Example license condition

- ▶ The licensee should adopt a standard fire protection license condition similar to what is currently incorporated in operating power reactor approved license
 - Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," discuss the regulatory treatment of the fire protection program. GL 86-10 requested that licensees incorporate the NRC-approved Fire Protection Program in their FSARs. GL 86-10 proposed the following standard fire protection license condition:

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NRC COL OPR

Fire Protection (Continued)

Extracted from GL 86-10:

(Name of Licensee) shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility (or as described in submittals dated _____) and as approved in the SER dated _____ (and Supplements dated _____) by _____, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

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NRC COL OPR

Inservice Inspection and Testing

- At the COL application stage
 - ▶ Certify that the design will provide: access and that the scope and methods of ISI and IST programs will comply with the code
 - ▶ Identify requests for relief, proposed alternative requirements, and Code cases. Staff review would be documented in the COL FSER.
 - ▶ Adherence to NUREG-0800, Sections 3.9.6, 5.2.4, and 6.6 should result in the COL application containing ISI and IST Program information similar to that contained in current operating plant FSARs.

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NRC COL OPR

Inservice Inspection and Testing (continued)

- Within 6 months of fuel load
 - ▶ The COL holder provides the NRC with comprehensive plant-specific inservice inspection and testing programs
 - Relief requests and requests for approval of alternatives (each specifically reviewed)
 - Design, scope, and methods (evaluated on a sample basis)
 - ▶ Acceptability of requests for relief and approval of alternatives documented in a safety evaluation
 - ▶ Compliance issues arising from program review resolved with the COL holder in regulatory or enforcement space, as appropriate
 - ▶ Adequate implementation verified by inspections which would be part of the Operational Readiness Assessment performed prior to the Commission's §52.103(g) finding
- Proposed license condition
 - ▶ Within 6 months of scheduled fuel load, the COL holder shall submit comprehensive plant-specific ISI and IST programs to the NRC for review and approval

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