



# **Integrated Safety Analysis Workshop**

**Division of Fuel Cycle Safety and Safeguards**

**Office of Nuclear Material Safety and Safeguards**

**Region II Division of Fuel Facility Inspection**

**U.S. Nuclear Regulatory Commission**

**Rockville, Maryland**

**February 22, 2005**

Enclosure 3a Introduction



# **ISA WORKSHOP**

**Introduction**

**February 22, 2005**

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# Workshop Purpose

- **Sponsored by the Division of Fuel Cycle Safety & Safeguards and the Region II Division of Fuel Facility Inspection**
- **Discussion, identification, and communication of 10 CFR 50 Subpart H regulatory implementation processes and issues**
- **Part of the NRC staff's initiative to continuously improve the processes for 10 CFR 70 licensing and inspection actions**
- **Focus on broad licensing, inspection, guidance, and implementation issues**
- **Discussion and interaction with the NRC staff and with colleagues to discuss more effective and efficient communication, methods, and processes for implementing regulatory requirements.**



# Fundamental Regulatory Philosophy

- **Safe operation of a nuclear facility is the responsibility of the licensee.**



# Background: 10 CFR Part 70 Subpart H

- **Requirements:**

Licensees or applicants establish and maintain a safety program that demonstrates compliance with the performance requirements for worker, public, and environment exposure

- **Safety Program Elements are:**

- process safety information,
- integrated safety analysis (ISA) identifying items relied on for safety (IROFS), and
- management measures.



## **Background (Cont.)**

- **Each licensee:**
  - **develops its own facility safety basis for its particular processes**
  - **develops its safety program**
  - **performs an ISA**
  - **determines the IROFS**
  - **implements management measures**
  - **assesses and maintains its safety program.**



# Key Actions or Features of Subpart H

- Initial submittal of ISA Summary for approval
- Latitude for licensee changes to safety program
- NRC preapproval required for “major process/new technology” changes
- All changes reviewed by licensee for safety impact under configuration management controls
- Summary of changes to the safety program records and ISA Summary submitted annually
- Initially, licensing review of annual submittal of changes
- Inspection verification of change control.



## **Part 70 Upgrade Goals**

- **Fuel cycle facilities have a wide range of processes and safety methods and management systems**
- **Safety program/ISA requirements intended to establish a consistent, risk-informed, performance-based framework of:**
  - **regulatory safety requirements**
  - **regulatory reviews**
  - **inspection bases.**