ISA WORKSHOP

ISA Review

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Enclosure 3k

Verification of Licensee's Safety Program (Adequacy)

- **Licensing reviews of initial ISA Summary and ISA documentation to verify compliance with performance requirements**

- **Review and verification of annual submittal of changes**

- **Inspection of implementation and maintenance of process safety information, the ISA, IROFS, and management measures**

- **Review and inspection results document verification of safety program implementation**

Meeting of Performance Requirements

- Applied methodology is appropriate.

- Results meet the regulatory requirements.

- All hazards and scenarios (or types of scenarios) leading to hazards have been identified.

- Assumptions are justified and reasonable.

- Appropriate items relied on for safety (IROFS) are identified, as are the safety functions that resulted in the IROFS designation.

- Appropriate indices were assigned to IROFS and initiating events.

Conduct of ISA Reviews

- In-office and on-site reviews by technical staff of ISA Summary and ISA Documentation to verify compliance with performance requirements

- Detailed look on a limited basis to confirm application of ISA methodology

- Verification that assumptions are justified and reasonable

- Evaluation to verify that the licensee has demonstrated that the approach meets the regulatory requirements

Intent of ISA Reviews

- **Review is not intended to be a detailed evaluation of all aspects of the ISA Summary, ISA and supporting documentation.**

- **Review samples a portion of the information to confirm the basis for calculations, conclusions, and components of the safety program.**

Technical Evaluation Report (TER)

- **Document review and conclusions on the licensees' ISA summaries**

- **Provide reasonable assurance that the applicant has:**

  - ➤ **performed a systematic evaluation of the hazards**

  - ➤ **identified credible accident sequences**

  - ➤ **identified IROFS and management measures that satisfy the performance requirements of 10 CFR 70.61**