

Operational Programs

- Recommended disposition of the 14 programs discussed in SECY-02-0067
- Program-specific discussions
 - ISI/IST
 - Fire Protection
 - Security
 - Radiation Protection
- NEI 04-01 COLA guidance



14 Programs in SECY-02-0067

	<u>FSAR</u>		<u>FSAR</u>
Emergency Planning (Note 1)	13.3	Physical Security	13.6
Quality Assurance	17.3	Fire Protection	9.5.1
Radiation Protection/HP	12.5	Access Authorization (Note 2)	
Fitness for Duty (Note 2)		Training	13.2
Licensed Operator	13.2.1	Reportability	(Note 3)
Containment Leak Rate Testing	6.2.6	Maintenance Rule	(Note 4)
Inservice Inspection and Inservice Testing (IST-3.9.6; ISI Class 1-5.2.4; ISI Class 2/3-6.6)		Equipment Qualification	3.11

Notes

- 1) Emergency planning will have ITAAC
- 2) Addressed as part of Security Plan (consistent with NEI 03-01)
- 3) Reporting procedures maintained by COL applicant/licensee – no FSAR program description
- 4) MR implementation to be described in Ch. 17 in connection with operational reliability assurance activities



14 Programs in SECY-02-0067 (cont.)

- Describe in FSARs*
 - Consistent with SRM/SECY-04-0032
 - Consistent with existing guidance and past practice
 - Based on discussions w/NRC staff
 - Identify implementation timing, e.g., “prior to fuel load”

* except for “Reportability”

NEI Draft For Discussion

03/05

NRC SRM - SECY-04-0032 - Programmatic Information Needed For Approval Of A Combined License Without Inspections, Tests, Analysis And Acceptance Criteria

REPORTABILITY

Background

NRC Reportability requirements for U.S. nuclear power plant licensees consist of those requirements contained in Title 10 of the Code of Federal Regulations (CFR) and include those in Parts 1 – 199 of 10 CFR and the Operating License (including Appendices A [Technical Specifications], B [Environmental Protection Plan]). NRC Regulatory Guides 10.1 and 1.16 identified reporting requirements applicable to NRC licensees and those contained in nuclear power plant Operating License Appendix A Technical Specifications, but these Regulatory Guides have not been updated since 1981 and 1975, respectively. There are over 200 federal regulation reporting requirements applicable to nuclear power plant licensees today, in addition to those contained in the plant Operating License.

Discussion

Reporting is not considered a “program” as implemented by nuclear power plant licensees. Licensees typically have an overall reporting procedure which identifies the reporting requirement, method, frequency, responsible department, preparer, approver, and submittal recipient. These specific reporting requirements are embedded in the responsible plant organization / departmental procedures for reports associated with specific events.

In addition, reportability is not included in the scope of FSAR operational program descriptions contained in Regulatory Guide 1.70, Revision 3, or NUREG-0800 (Standard Review Plan). As such, a description of reportability has not been considered a required element by the NRC to make a reasonable assurance finding of adequate protection of public health and safety.

Conclusion

Reporting has not been considered a “program” by the NRC or as implemented by nuclear power plant licensees. NRC Reporting consists of federal requirements which are embedded in nuclear power plant procedures. In addition, reportability is not included in the scope of FSAR operational program descriptions contained in Regulatory Guide 1.70, Revision 3, or NUREG-0800 (Standard Review Plan) for NRC determination of a reasonable assurance finding of adequate protection of public health and safety.

Program-Specific Discussions

- ISI/IST
- Fire Protection
- Security
- Radiation Protection

NEI 04-01 COLA Guidance

- Treat 14 programs in SECY-02-0067 as previously discussed
- Additional programs identified in RG 1.70 and/or the existing SRP
 - Describe in FSARs consistent with past practice
- Other operational programs
 - Not described in FSAR
 - Program documentation consistent with current practice

NEI Draft For Discussion

03/05

**NRC SRM - SECY-04-0032 - Programmatic Information Needed For Approval Of
A Combined License Without Inspections, Tests, Analysis And Acceptance Criteria**

MAINTENANCE RULE

Background

10 CFR 50.65 (Requirements for monitoring the effectiveness of maintenance at nuclear power plants) was established in 1991 (with amendments through 1999); its issuance predates the initial licensing of the current nuclear operating fleet. The Maintenance Rule is applicable to operating license holders during all conditions of plant operation (including normal shutdown operations). For plants licensed under Part 52, the Maintenance Rule would be effective after Fuel Load. As such, ITAAC on the Maintenance Rule Program are not contemplated, as discussed in SECY-04-0032.

Discussion

Current FSARS do not contain descriptions of the Maintenance Rule Program. The rule is fairly prescriptive such that an FSAR description would likely mimic the rule; further details would typically only exist at the procedure level. The Maintenance Rule Program is one of the important elements of operational reliability assurance.

Conclusion

Discussion of the Maintenance Rule Program would be included in the COLA FSAR in the context of operational reliability assurance at a level of detail consistent with draft SRP 17.4.

be submitted to the NRC but with held from public disclosure in accordance with the provisions of 10 CFR 73.21.

Implementation

As described in NEI 04-01 Section 5.1.2, 10 CFR 26.2(c) specifies that certain elements of Fitness for Duty Program are applicable for plants under active construction. "Active Construction" would constitute a licensing action by the NRC which allows limited work (i.e., 10 CFR 50.10(e)(3) or the issuance of a COL. Portions of the Security Plan (site physical security, access authorization, fitness for duty) associated with the receipt of special nuclear material will in place prior to receipt of the special nuclear material (e.g., new fuel) on site. The entire plant specific Security Plan will be implemented prior to fuel load.

Adequate implementation of nuclear power plant licensee Security Plan requirements would be verified by normal NRC inspection activities. These inspections would be part of the Operational Readiness Assessment performed by the NRC.

NEI Draft For Discussion

03/05

NRC SRM - SECY-04-0032 - Programmatic Information Needed For Approval Of A Combined License Without Inspections, Tests, Analysis And Acceptance Criteria

SECURITY, ACCESS AUTHORIZATION, FITNESS FOR DUTY

Background

The security program for a nuclear power plants encompasses all of the elements associated with site physical security, access authorization, and fitness for duty. Nuclear power plant licensee Security and Access Authorization requirements are contained in Part 73 of Title 10 of the Code of Federal Regulations (10CFR). Requirements for Fitness for Duty are contained in 10 CFR Part 26. Following the events of September 11, 2001, the NRC issued security orders which supplemented and in some cases modified the security requirements contained in Parts 73 and 26.

Discussion

Nuclear power plant licensees have implemented security requirements, including recent NRC orders, in their Security Plans, Contingency Plans and Guard Training and Qualification Plans (collectively the Security Plan) based on a template that was endorsed by NRC (NEI 03-12, Revision 1). The template language in the industry Security Plans incorporates by reference NEI 03-01, Revision 1 (Nuclear Power Plant Access Authorization Program), which provides the program description for the Access Authorization and Fitness for Duty Programs and reflects the updated requirements based on the NRC security order compensatory measures. The Security Plan will be a license condition (SECY 00-0092, Attachment 2, Paragraph 2.G) contained in the plant combined operating licensee (COL) and will incorporate by reference the description of the Access Authorization and Fitness for Duty programs in NEI 03-01, Revision 1.

The level of detail in a COL application regarding these programs will be the same as the previously approved template for the Security Plans of the existing operating plants (i.e., NEI 03-12, Revision 1 and NEI 03-01, Revision 1). The Security Plan, including requirements for Access Authorization and Fitness for Duty, is addressed in Chapter 13 of the FSAR. This information is submitted to the NRC but withheld from public disclosure in accordance with the provisions of 10 CFR 73.21 for security reasons.

For example, AP1000 DCD Section 13.6 addresses security. Specific aspects of the plant physical security design have been reviewed and approved by the NRC as provided in the AP1000 Security Assessment that was submitted under separate cover in accordance with 10 CFR 73.21. The balance of security information assigned to the COL applicant as COL information items will be addressed in the COL applicant plant specific DCD which will reference the Security Plan as described above. The plant specific Security Plan will

Adequate implementation of nuclear power plant licensee reporting procedures can be verified by normal NRC inspection activities.