



U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN
OFFICE OF NUCLEAR REACTOR REGULATION

13.5.1 ADMINISTRATION PROCEDURES

REVIEW RESPONSIBILITIES

Primary - Licensee Qualifications Branch (LQB)

Secondary - None

I. AREAS OF REVIEW

LQB reviews the plant administrative procedures, as described in the applicant's safety analysis report (SAR). This section of the SAR should describe administrative procedures that provide administrative control over activities that are important to safety for the initial test program and operation of the facility. In general, it is not expected that detailed written procedures will be included in the SAR. The final safety analysis report (SAR) should provide descriptions as to the nature and content of procedures as detailed below. No information is required in the preliminary safety analysis report. The Procedures and Text Review Branch (PTRB) reviews testing and operational procedures as described in SRP Section 13.5.2.

A. Administrative Procedures - General

This section reviews administrative procedures (13.5.1). These procedures include (a) those which provide the administrative controls in respect to procedures, and (b) those which define and provide controls for operational activities of the plant staff. Parts (a) and (b) below describe the type of procedures that are included in the review.

Category (a) - Controls

1. Procedures review and approval
2. Equipment control procedures
3. Control of maintenance and modifications
4. Fire protection procedures

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USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20555.

5. Crane operation procedures
6. Temporary changes to procedures
7. Temporary procedures
8. Special orders of a transient or self-cancelling character

Category (b) - Specific Procedures

1. Standing orders to shift personnel including the authority and responsibility of the shift supervisor, senior operator in the control room, control room operator, and shift technical advisor
2. Assignment of shift personnel to duty stations
3. Shift relief and turnover
4. Control room access
5. Limitations on working hours
6. Feedback of operating experience
7. Shift supervisor administrative duties
8. Verification of correct performance of operating activities

LQB coordinates as necessary with the PTRB to assure any special criteria for procedural controls governing testing and operational procedures are met.

B. Administrative Procedures - Initial Test Program

LQB also reviews the administrative procedures that establish controls associated with the initial plant test program. This includes the system used to develop test procedures, the administrative controls that will govern the conduct of the test program, and the controls that will govern the review, evaluation, and approval of test results.

The following items are included.

1. Test Program Procedures

The system the applicant will use to develop, review, and approve individual test procedures is reviewed. The responsibilities of the organizational units that will perform these activities, the designated functions of each organizational unit, and the general steps to be followed in governing these activities are reviewed. The type and source of design performance information that will be, or is being, used in the development of detailed test procedures is reviewed.

2. Conduct of Test Program

The administrative controls that will govern the conduct of each major phase of the test program are reviewed. The following specific items are reviewed:

- a. The means used to assure that prerequisites are satisfied for individual tests.
 - b. The procedures to be followed to assure that plant modifications, or repairs that result from test program analysis, are performed.
 - c. The procedure used to ensure that necessary retesting is performed following repairs or modifications.
 - d. The controls that will be in effect to require adherence to approved test procedures.
3. Review, Evaluation, and Approval of Test Results

The procedures that will govern the review, evaluation, and approval of test results for each phase of the test program are reviewed, including the specific controls to be used to assure notification of responsible organizations, such as design organizations, when test acceptance criteria are not met and the specific controls established to resolve such problems. The applicant's controls relating to the methods and schedules for approval of test data for each major phase are reviewed as well as the methods used for initial review of parts of multiple tests (e.g., hot functional testing) prior to proceeding with the test phase.

II. ACCEPTANCE CRITERIA

LQB acceptance criteria are based on meeting the relevant requirements of 10 CFR Part 50, §50.40(b) as it relates to the administrative procedures program contributing to the determination that the licensee is technically qualified to engage in licensing activities, and §50.54(1) as it relates to the licensee designating individuals to be responsible for directing the licensed activities of licensed operators.

A. Administrative Procedures - General

The available staff positions applicable to this SRP section are as follows. (Note - where regulatory guides are referenced, the current issue of the guide at the time of the review shall be used.)

1. The guidance described in Section 5.2 of ANSI/ANS 3.2, as endorsed by Regulatory Guide 1.33.
2. The requirement of 10 CFR Part 50, §50.54(1).
3. The plant procedures for shift relief and turnover should conform to the guidance of Task Action Plan Item I.C.2 of NUREG-0694.
5. Limits on working hours should conform to the guidance described in Task Action Plan Item I.A.1.3 of NUREG-0737.
6. Control room access should conform to the guidance described in Item I.C.4 of NUREG-0694.

7. The procedure for the feedback of operating information should conform to the guidance described in Task Action Plan Item I.C.5 of NUREG-0737.
8. The procedure for verifying the correct performance of operating activities should conform to the guidance described in Task Action Plan Item I.C.6 of NUREG-0737.
9. Administrative controls governing crane operations are to include a requirement that the crane operators who operate cranes over fuel pools be qualified and conduct themselves in accordance with the guidelines of ANSI B30.2-1976 (Chapter 2-3), "Overhead and Gentry Cranes."

B. Administrative Procedures - Initial Test Program

1. Test Procedures

The applicant's administrative and organizational system that will be used to develop, review, and approve individual test procedures should provide for appropriate levels of review prior to final approval. The individuals performing these functions should meet the qualification requirements described in Section 4.4.6 of ANS 3.1 draft revision dated 12/6/79. The applicant should utilize system designers to provide the test objectives and acceptance criteria used in developing detailed test procedures. The participating system designers should include those of the nuclear steam supply system vendor, architect-engineer, and other major contractors, subcontractors, and vendors, as appropriate.

2. Conduct of Test Program

- a. The test program should be conducted by appropriately qualified personnel using detailed procedures approved by designated management positions within the applicant's organization.
- b. The controls used by the applicant to assure that test pre-requisites are met should include requirements for inspections, checks, etc., require identification of test personnel completing data forms or checksheets and require identification of dates of completion.
- c. The controls provided for plant modification and repairs, identified as a result of plant testing, are found to be acceptable if: (1) the controls are sufficient to assure the required repairs modifications will be made, (2) the controls will assure retesting is conducted following such modifications or repairs, and (3) the controls will assure a review of any proposed facility modifications by the original design organization or other designated design organizations. The applicant's requirements for documentation associated with such controls should permit audits to be made to assure proper implementation of controls.
- d. The controls pertaining to adherence to test procedures and to methods for changing test procedures are found to be acceptable based on the reviewer's judgment. Modifications to startup test

procedures should be made in accordance with technical specifications for post-fuel loading tests.

3. Review, Evaluation, and Approval of Test Results

- a. The controls that will govern the review, evaluation, and approval of test results should provide for a technical evaluation of test results of qualified personnel and approval of test result in or personnel in designated management positions in the applicant's organization.
- b. Design organizations should be notified and should participate in the resolution of problems involving design that result in or contribute to a failure to meet test acceptance criteria.
- c. The applicant should establish the requirement that test data for each major test phase will be reviewed and approved prior to beginning the next phase of testing.
- d. The applicant should establish the requirement that test data at each major power test plateau or power/flow test condition will be reviewed and approved before proceeding to the next test level during the power ascension test phase.

III. REVIEW PROCEDURES

The review under this SRP section consists of a detailed comparison of the information submitted with the acceptance criteria of subsection II above, as applicable to the FSAR. When the reviewer has determined that each of these criteria has been satisfied, based upon the statements made by the applicant in the SAR, the review under this SRP section is complete.

This detailed comparison form of review is applicable to those items for which acceptance criteria are defined in subsection II. For those remaining items (primarily those providing operational controls), the reviewer must use his judgment in determining that adequate controls have been provided by the applicant.

IV. EVALUATION FINDINGS

The reviewer verifies that the information presented and his review support the following type of conclusion to be used in the staff's safety evaluation report.

The staff concludes that the Administrative Procedures are acceptable and contribute to meeting the requirements of 10 CFR Part 50, §50.40(b) and §50.54(1). This conclusion is based on the following:

The applicant has described the program and procedures that provide administrative controls over activities important to safety. These include the activities of the preparation, review, and approval of plant operating and maintenance procedures, the responsibility and duties of shift personnel, shift relief and turnover procedures, access to the control room, limitations on working hours, the feed-back of operating information to plant personnel, the procedure for verifying the correct performance of operating activities, and the

administrative provisions for the control of the initial plant test program. We have reviewed these provisions and find they meet the staff guidance described in Section 5.2 of ANSI/ANS 3.2 and in Regulatory Guide 1.33 and the applicable parts of the Task Action Plan Items I.A.1.2, I.A.1.3, I.C.2, I.C.3, I.C.4, I.C.5, and I.C.6. The applicant has also met the guidelines of ANSI B30.2 and Section 4.4.6 of ANS 3.1.

In addition, the implementation of an administrative procedures program contributes to the finding required by 10 CFR Part 50, §50.40(b), i.e., that the applicant is technically qualified (to operate a nuclear power plant).

V. IMPLEMENTATION

The following is intended to provide guidance to applicants and licensees regarding the NRC staff's plans for using this SRP section.

Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

Implementation schedules for conformance to parts of the method discussed herein are contained in the referenced regulatory guide and NUREGs.

VI. REFERENCES

1. 10 CFR Part 50 §50.40, "Common Standard."
2. 10 CFR Part 50, §50.54, "Conditions of Licenses."
3. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."
4. NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."
5. NUREG-0694, "TMI-Related Requirements for New Operating Licenses."
6. NUREG-0737, "Clarification of TMI Action Plan Requirements."