

# Workshop on Fuel Cycle Procedure Revisions



August 4, 2005

# Strategy

- **Incorporate new regulatory requirements of 10 CFR Part 70.60-76**
- **Consolidate and reduce duplication among the procedures and technical disciplines**
- **Create more uniform procedure format and content**

# Fuel Cycle Procedure Changes

- **880XX**      **Plant Safety Modifications** (*New!*)
- **Nuclear Criticality Safety procedures** (*New!*)
  - **8801X NCS Program**
  - **8801Y NCS Evaluations**
  - **8801Z Criticality Alarm Systems**
- **88020**      **Operational Safety**
- **88005**      **Management Organization and Controls**
- **88010**      **Operator Training/Retraining**
- **88025**      **Maintenance and Surveillance Testing**

# **Fuel Cycle Procedure Changes, *continued***

- **88050**    **Emergency Preparedness**
- **88051**    **Evaluation of Exercises and  
Drills (*New!*)**
  
- **83822**    **Radiation Protection**
- **88035**    **Radioactive Waste Management**
- **88045**    **Environmental Protection and  
Effluent Control**

# Procedures Eliminated

- **84850**      **Waste Generator Requirements of 10 CFR Part 20 and Part 61**
- **84900**      **Low-level Radioactive Waste Storage (84850 and 84900 incorporated into draft 88035 and 88045 )**
- **88056-66** **Chemical Safety Inspection Program (these procedures were incorporated into other fuel cycle procedures)**
- **88015**      **Nuclear Criticality Safety**

# **IP 880XX**

## **Plant Safety Modifications**

- **New procedure incorporates facility changes and change process requirements of 10 CFR Part 70.72**
- **Procedure contains configuration control and design change inspection responsibilities from IP 88015 and IP 88020**
- **Incorporates applicable sections from 88063 (chemical safety inspection program)**
- **Procedure takes integrated look at plant modifications and the safety analyses supporting the modifications**

# **NCS Program**

## **Inspection Procedure 8801X**

- **New procedure re-focuses HQ NCS program review**
- **HQ inspection focus areas:**
  - **Nuclear Criticality Safety Program**
  - **Administrative and Operating Procedures**
  - **Nuclear Criticality Safety Training and Qualification**
  - **Nuclear Criticality Safety Inspections, Audits, and Investigations**
  - **Plant Activities**

# **NCS Evaluations**

## **Inspection Procedure 8801Y**

- **New procedure places primary HQ NCS focus on analytical issues**
- **HQ inspection focus areas:**
  - **Nuclear Criticality Safety Limits and Controls**
  - **Nuclear Criticality Safety Evaluations**
  - **Independent Review of Nuclear Criticality Safety Evaluations**
  - **Subcritical Margin**
  - **Validation**



# **Criticality Alarm Systems**

## **Inspection Procedure 8801Z**

- **New procedure re-focuses HQ inspection of criticality alarms to design and coverage**
- **HQ inspection focus areas:**
  - **System Requirements**
  - **Audibility**
  - **Response**
  - **Reliability**
  - **Sensitivity**
- **Inspection areas focus on system design and analytical basis of coverage**

# **IP 88020**

## **Operational Safety**

- **Reduce duplication in 88020**
  - **Portions of IP 88020 removed and placed in:**
    - **88005, Management,**
    - **88010, Training,**
    - **88025, Maintenance and Surveillance, and**
    - **88050, Emergency Preparedness.**
- **Incorporates TI 2600/003**
  - **Temporary Instruction 2600/003, Operational Safety Review, was incorporated into 88020**
- **Incorporates applicable sections from 88056, 88057, 88058 (chemical safety inspection program)**

# IP 88020

## Operational Safety, *continued*

- **Implements new 10 CFR Part 70.60-76**
  - Adds new regulations to procedure
  - New regulations do not apply to Part 40 and 76 licensees and certificatees
- **Removed configuration control and design change**
  - Placed in new 880XX, Plant Safety Modifications
- **Safety emphasis**
  - Safety emphasis now includes radiological, chemical, nuclear criticality and fire protection

# **IP 88005**

## **Management Organization and Controls**

- **Adds management sections from IP 88020**
- **Incorporates applicable sections from 88058, 88059, 88065 and 88066 (chemical safety inspection program)**
- **Adds emphasis including radiological, chemical, nuclear criticality and fire protection**
- **Implements new 10 CFR Part 70.62 management measures**

# **IP 88010**

## **Operator Training/Retraining**

- **Adds chemical safety training sections from IP 88061**
- **Adds training sections from IP 88015 and IP 88020 for:**
  - **emergency response personnel,**
  - **fire response personnel,**
  - **maintenance personnel, and**
  - **criticality safety training (for general workers, not criticality safety staff)**
- **Places emphasis on inspecting training for additional safety considerations required by 10 CFR Part 70.60-76**

# **IP 88025**

## **Maintenance and Surveillance Testing**

- **Adds maintenance and surveillance testing from IP 88062 (chemical safety inspection program)**
- **Adds maintenance and surveillance testing from IP 88015 and 88020**
- **Places emphasis on inspecting maintenance and surveillance testing for additional safety considerations required by 10 CFR Part 70.60-76**

# **IP 88050, Emergency Preparedness**

## **IP 88051, Evaluation of Exercises and Drills**

- **Adds emergency response sections from IP 88020**
- **Incorporates applicable sections from 88064 (chemical safety inspection program)**
- **Provides additional inspection detail for the evaluation of exercises and drills in a new procedure, IP 88051**

# **IP 83822**

## **Radiation Protection**

- **Changes responsibility for radiation protection management, organization, and functional reviews from 88005 to 83822**



# **IP 88035**

## **Radioactive Waste Management**

- **Adds inspection requirements of:**
  - **IP 84850, Waste Generator Requirements of 10 CFR Part 20 and Part 61**
  - **IP 84900, Low-Level Radioactive Waste Storage**
  - **(thus eliminating two procedures)**
- **Removes radioactive liquid and airborne effluent sections and placed them in IP 88045, Environmental Protection**
- **This rearrangement**
  - **(a) places radioactive waste management into one procedure**
  - **(b) places the monitoring of effluents from the site to the environment into one procedure**

# **IP 88035**

## **Radioactive Waste Management, *continued***

- **Addresses scaling factors for fuel cycle facilities**
- **Addresses byproduct materials transferred to unlicensed persons (i.e. Uranium contaminants in chemicals sold to offsite unlicensed companies)**
- **Updates procedure to current criteria for waste burial**

# **IP 88045**

## **Environmental Protection**

- **Adds radioactive liquid and airborne effluents from IP 88035**
- **Monitoring of effluents from the site to the environment now included in one procedure**