

C.IV.4. Operational Programs

On October 28, 2005, the staff of the U.S. Nuclear Regulatory Commission (NRC) submitted a Commission Paper (SECY-05-0197), entitled "Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria [ITAAC]." In that Commission paper, the staff detailed its plan for reviewing operational programs in a combined license (COL) application. The Commission approved the staff's plan in the related staff requirements memorandum (SRM), dated February 22, 2006. Implementation of the proposals approved by the SRM is described in the following subsections.

C.IV.4.1 Applicability

Although numerous programs support the operation of a nuclear power plant, SECY-05-0197 focused on those programs that meet the following three criteria:

- (1) required by regulation
- (2) reviewed in a COL application
- (3) inspected to verify program implementation as described in the final safety analysis report (FSAR)

On the basis of those criteria, SECY-05-0197 listed the following programs, which are collectively referred to as "operational programs":

- Containment Leakage Rate Testing
- Fire Protection
- Operator Training
- Plant Staff Training
- Access Authorization
- Radiation Protection
- Process and Effluent Monitoring/Sampling
- Preservice Inspection
- Preservice Testing
- Equipment Qualification
- Motor-Operated Valve Testing
- Weapons Training
- Emergency Preparedness
- Maintenance Rule
- Operator Requalification
- Physical Security
- Vehicle Control
- Fitness-for-Duty
- Reactor Vessel Material Surveillance
- Quality Assurance - Operations
- Inservice Inspection
- Inservice Testing
- Safeguards Contingency Plan
- Weapons Qualification/Requalification

Use of the term "operational programs" in this regulatory guide refers to these specific programs unless otherwise stated. Nonetheless, the staff continues to assess whether this list encompasses the complete set of operational programs. Any additional operational programs identified through the staff's assessment will be included in the final regulatory guide, consistent with the Commission's direction in the SRM regarding SECY-05-0197.

C.IV.4.2 Treatment of Operational Programs in COL Applications

In its SRM regarding SECY-05-0197, the Commission endorsed the staff's proposal that an operational program does not necessarily require inspections, tests, analyses, and acceptance criteria (ITAAC) in the COL application, provided that the application "fully describes" the program and its implementation. Thus, in order to avoid the need to propose ITAAC for a given operational program [with the exception of emergency preparedness/planning (EP)]¹, the COL applicant shall describe the following:

¹ Emergency preparedness/planning (EP) programs are required to include ITAAC; however, its treatment is not discussed in this section of the regulatory guide.

- (1) the operational program, consistent with the level of information provided in FSARs
- (2) the implementation of the operational program

Toward that end, Section 13.4 of the safety analysis report (SAR) should provide a table that lists each operational program, the section(s) of the SAR in which the operational program is fully described, and the associated implementation milestones. For example, the table entry for the radiation protection program should look something like this:

Operational Program	SAR Section Number	Implementation Milestone(s)
Radiation Protection	12.5	(1) Sources on site (2) Fuel on site (3) Fuel load (4) First shipment of waste

The next section provides additional detail concerning COL application guidance related to operational program implementation milestones.

Given that the COL application is essentially a safety analysis report (SAR), the staff notes that current FSARs do not consistently contain the level of detail that the staff needs to review and approve an operational program identified in a COL application. Specifically, the COL application should include information to fully describe the operational program, as described (or referenced) in this regulatory guide.

C.IV.4.3 Implementation of Operational Programs

Aside from EP, NRC regulations specify implementation requirements for the following programs:

- Containment Leak Rate Testing
- Operator Requalification
- Plant Staff Training
- Inservice Inspection
- Inservice Testing

The COL application should fully describe how these requirements are implemented.

The remaining programs listed in SECY-05-0197 have no implementation requirements specified in the regulations. Therefore, their implementation is being controlled in the COL by the implementation license conditions that the Commission approved in the SRM regarding SECY-05-0197.

The first implementation license condition approved in the SRM regarding SECY-05-0197 applies to the fire protection program, as follows:

(Name of Licensee) shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility (or as described in submittals dated _____) and as approved in the SER dated _____ (and Supplements dated _____) subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The second implementation license condition approved in the SRM regarding SECY-05-0197 is as follows:

The licensee shall fully implement and maintain in effect all provisions of the physical security plan, security personnel training and qualification plan, and safeguards contingency plan, and all amendments made pursuant to the authority of 10 CFR 50.90, 50.54(p), 52.97 [, and Section VIII of Appendix to Part 52] when nuclear fuel is first received onsite, and continuing until all nuclear fuel is permanently removed from the site.

This license condition applies to the following programs:

- Physical Security
- Weapons training and weapons qualification and requalification
- Vehicle Control
- Access Authorization
- Fitness for Duty
- Safeguards Contingency Plan

The third implementation license condition approved in the SRM regarding SECY-05-0197 is as follows:

The licensee shall implement the programs or portions of programs identified in Table___ on or before the associated milestones in Table___.

This license condition applies to the following programs:

- Maintenance Rule
- Operator Training
- Radiation Protection
- Reactor Vessel Material Surveillance
- Process and Effluent Monitoring and Sampling
- Quality Assurance – Operation
- Preservice Inspection
- Preservice Testing
- Equipment Qualification
- Motor-Operated Valve Testing

On the basis of these three license conditions, the table in Section 13.4 of the SAR should include specific implementation milestones, and the implementation of these operational programs should be fully described in the same section of the SAR in which the program is fully described. Note that the third implementation license condition approved in the SRM regarding SECY-05-0197 specifically refers to this table.

Certain operational program license conditions may over time become unnecessary because implementation requirements for these programs may have been codified into the regulations. COL applicants should note this in their application with a reference to the regulation.

C.IV.4.4 Optional Treatment of Operational Programs

COL applicants may choose to use an operational program to satisfy a regulation, although the program is not explicitly required by regulation. For example, a COL applicant might adopt a sump strainer cleanliness program to satisfy the emergency core cooling system requirements in the regulations. In such instances, the COL applicant should add the given operational program to the list of programs in Section 13.4 of the SAR, and should fully describe the program and its implementation in the SAR.

COL applicants may propose ITAAC for a particular operational program as an alternative to fully describing the program in the COL application. The COL applicant must fully describe the operational program in the COL application and state that ITAAC is being proposed for that operational program in lieu of fully describing its implementation.

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