

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].” This paper also included pertinent information from previous Commission papers (SECY-02-0067 and SECY-04-0032) on operational programs. In SECY-05-0197, 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. The update to 10 CFR Part 52 has codified the Commission’s direction, such that COL applicants must fully describe certain operational programs and their implementation in the COL application.

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)

The following programs that meet the above criteria are collectively referred to as “operational programs” and were identified in SECY-05-0197. Implementation milestones for several of these operational programs have been addressed in the update to 10 CFR Part 52. License conditions will be used to ensure implementation for those operational programs not addressed in the update to 10 CFR Part 52:

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

Use of the term “operational programs” in this regulatory guide refers to these specific programs unless otherwise stated. The staff continues to assess whether this list encompasses a 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. The operational programs identified above and in SECY-05-0197 may be

consolidated in future rulemakings. For example, since the issuance of SECY-05-0197, clarifications in the scope of the operational programs for security have resulted in a reorganization and consolidation of the security programs designated in SECY-05-0197. This reorganization and consolidation of operational programs for security is reflected in Table 13.4-1 of Section C.I.13. The Vehicle Control Program, Access Authorization Program, and Fitness for Duty Program are now part of the Physical Security Program identified in Table 13.4-1. The Weapons Training Program, and Weapons Qualification and Requalification Program are now part of the Training and Qualification Program identified in Table 13.4-1 of this guide.

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 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 planning (EP)]¹, the COL applicant must fully describe the following:

- (1) the operational program
- (2) the implementation of the operational program

In the SRM for SECY-04-0032, dated May 14, 2004, the Commission defined "fully described" as follows:

In this context, "fully described" should be understood to mean that the program is clearly and sufficiently described in terms of scope and level of detail to allow a reasonable assurance finding of acceptability. Required programs should always be described at a functional level and at an increased level of detail where implementation choices could materially and negatively effect the program effectiveness and acceptability.

Toward that end, Section 13.4 of the final safety analysis report (FSAR) 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	FSAR 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

C.IV.4.3 Implementation of Operational Programs

Implementation milestones for several operational programs have been addressed in the update to 10 CFR Part 52. License conditions will be used to ensure implementation for those operational programs not addressed in the update to 10 CFR Part 52.

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

¹ Emergency planning (EP) programs are required to be included in ITAAC.

(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.

The NRC recommends that the Table in Section 13.4 of the FSAR include specific implementation milestones, and the implementation of these operational programs should be fully described in the same section of the FSAR in which the program is fully described.

C.IV.4.4 Optional Treatment of Operational Programs

COL applicants may choose to use an operational program 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 operational program to the list of programs in Section 13.4 of the FSAR, and should fully describe the program and its implementation in the FSAR.

COL applicants may propose ITAAC for a particular operational program as an alternative to fully describing the implementation of the program in the COL application. In that case, 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.