

C.I.13 Conduct of Operations

The regulatory requirements at 10 CFR 52.79 and 10 CFR 52.80 provide the content for a COL application pursuant to 10 CFR Part 52, Subpart C. Each application must include a FSAR that provides information concerning facility design, construction, and operation. This chapter provides guidance on the information necessary in a COL application for the NRC to perform its review of proposed facility design, construction, and operation in accordance with the regulatory requirements above.

This chapter of the FSAR should provide information relating to the preparations and plans for design, construction, and operation of the plant. Its purpose is to provide adequate assurance that the COL applicant establish and maintain a staff of adequate size and technical competence and that operating plans to be followed by the licensee are adequate to protect public health and safety. Applicants have the choice of including information which is site specific or different from a generic FSAR Section 13.1 in this section or an appendix to this section. Applicants may use a table or appendix to facilitate the update of information in Section C.I.13.

C.I.13.1 Organizational Structure of Applicant

C.I.13.1.1 *Management and Technical Support Organization*

A COL applicant should provide a description of the corporate or home office organization, its functions and responsibilities, the number and the qualifications of personnel, and should be directed to activities that include facility design, design review, design approval, construction management, testing, and operation of the plant. This information can be contained in this section or an appendix to this section.

The descriptions of the design and construction and preoperational responsibilities should include the following:

- (1) how these responsibilities are assigned by the headquarters staff and implemented within the organizational units
- (2) the responsible working- or performance-level organizational unit
- (3) the estimated number of persons to be assigned to each unit with responsibility for the project
- (4) the general educational and experience requirements for identified positions or classes of positions
- (5) early plans for providing technical support for the operation of the facility

The following sections discuss the specific information that should be included.

C.I.13.1.1.1 Design, Construction, and Operating Responsibilities

The application should describe the COL applicant's past experience in the design, construction, and operation of nuclear power plants and past experience in activities of similar scope and complexity. The applicant should also describe its management, engineering, and technical support organizations. The description should include organizational charts for the current headquarters and engineering structure and planned modifications and additions to those organizations to reflect the added functional responsibilities with the nuclear plant as identified below:

(1) Design and Construction Responsibilities

The extent and assignment of these activities, which the COL applicant determines, are generally contractual in nature. The application should describe the following aspects of the implementation or delegation of design and construction responsibilities (Chapter 17 should describe QA aspects):

- (a) principal site-related engineering studies such as meteorology, geology, seismology, hydrology, demography, and environmental effects
- (b) design of plant and ancillary systems, including fire protection systems
- (c) review and approval of plant design features, including human factors engineering (HFE) considerations
- (d) site layout with respect to environmental effects and security provisions
- (e) development of safety analysis reports
- (f) review and approval of material and component specifications

(2) Technical Support for Operations

Technical services and backup support for the operating organization should be available before the preoperational and startup testing program begins and continue throughout the life of the plant. The following special capabilities should be included:

- (a) nuclear, mechanical, structural, electrical, thermal-hydraulic, metallurgy and materials, and I&C engineering
- (b) plant chemistry
- (c) health physics
- (d) fueling and refueling operations support
- (e) maintenance support
- (f) operations support
- (g) QA
- (h) training
- (i) safety review
- (j) fire protection
- (k) emergency coordination
- (l) outside contractual assistance

C.I.13.1.1.2 Organizational Arrangement

In the FSAR, the description should include organization charts reflecting the current headquarters and engineering structure and any planned modifications and additions to reflect the added functional responsibilities (as described in Section 13.1.1.1 in this guide) associated with the addition of the nuclear plant to the applicant's power generation capacity. The description should show how these responsibilities are delegated and assigned or expected to be assigned to each of the working- or performance-level organizational units identified to implement these responsibilities.

In the FSAR, the description should include organizational charts reflecting the current corporate structure and the specific working- or performance-level organizational units that will provide technical support for operation (see Section 13.1.1.1, Item 3 in this guide). If these functions are to be provided from outside the corporate structure, the contractual arrangements should be described.

The information submitted should include a description of the activity (including its scope), an organizational description, with chart lines of authority and responsibility for the project, the number of persons assigned to the project, and qualification requirements for principal management positions for the project. NSSS and architect-engineer organizations with extensive experience may provide a detailed description of this experience in lieu of the details of their organization as evidence of technical capability. However, the applicant should describe how they intend to apply this experience to the project.

The FSAR should provide the following information:

- (1) organizational charts of the applicant's corporate-level management and technical support organizations
- (2) the relationship of the nuclear-oriented part of the organization to the rest of the corporate organization
- (3) a description of the provisions for technical support for operations

For new, multiunit plant sites, the COL applicant should describe the organizational arrangement and functions to meet the needs of the multiple units. The applicant should include in this discussion the extent to which the organizational arrangement and functions are shared between or among the units addressed in the application and describe the organizational arrangement and functional divisions or controls that have been established to preserve integrity between individual units and/or programs.

For plant sites with existing, operating nuclear units, the applicant should include in this discussion the extent to which the organizational arrangement and functions are shared between the new and existing units. In addition, the applicant should include a discussion of the organizational arrangement and functional divisions or controls that have been established to preserve integrity between the new and existing, operational units and/or programs.

C.I.13.1.1.3 Qualifications

The FSAR should describe general qualification requirements in terms of educational background and experience requirements for positions or classes of positions identified in Section 13.1.1.2. For identified positions or classes of positions that have functional responsibilities for other than the identified application, the application should describe the expected proportion of time assigned to the other activities.

The FSAR should identify qualification requirements for Headquarters staff personnel, which should be described in terms of educational background and experience requirements, for each identified position or class of positions providing headquarters technical support for operations. In addition, the FSAR should include qualification requirements for individuals assigned to fulfill responsibilities identified in item 3 of Section 13.1.1.1, including the job position that corresponds most closely to that identified as "engineer in charge."

The FSAR should (1) give the approximate numbers of and describe educational and experience requirements for, each identified position or class of positions providing technical support for plant operations and (2) include specific educational and experience requirements for individuals holding the management and supervisory positions in organizational units providing support in the areas identified below:

- (1) nuclear, mechanical, structural, electrical, thermal-hydraulic, metallurgical, materials, and I&C engineering
- (2) plant chemistry
- (3) health physics
- (4) fueling and refueling operations support
- (5) maintenance support
- (6) operations support
- (7) QA (addressed in Section 17.5)
- (8) training
- (9) safety review
- (10) fire protection
- (11) emergency coordination
- (12) outside contractual assistance

C.I.13.1.2 Operating Organization

This section of the FSAR should describe the structure, functions, and responsibilities of the onsite organization established to operate and maintain the plant. It is recognized that during the early stages of plant design and construction, many details of the plant organization and staffing have not been finalized and may be modified following issuance of a COL, during construction, or in preparation for plant operation. The organizational information provided as part of a COL application should include the following elements:

- (1) the applicant's commitment to meet the guidelines of RG 1.33 for its operating organization
- (2) the applicant's commitment to meet the guidelines of RG 1.33 for onsite review and rules of practice (addressed in Section 17.5)
- (3) the applicant's commitment to meet the applicable requirements for a fire protection program
- (4) the applicant's commitment to meet the guidelines of RG 1.8 for its operating organization
- (5) the applicant's commitment to be consistent with one of the options in the Commission's Policy Statement on Engineering Expertise on Shift
- (6) the applicant's commitment to meet TMI Action Plan Items I.A.1.1 and I.A.1.3 of NUREG-0737 for shift staffing
- (7) a schedule, relative to fuel loading for each unit, for filling all positions
- (8) the applicant's commitment to meet the applicable requirements for a physical protection program

As applicable, the applicant should provide evidence that the initial personnel selections conform to the commitments made in the application.

C.I.13.1.2.1 Plant Organization

The applicant should provide an organization chart showing the title of each position, the minimum number of persons to be assigned to duplicate positions (e.g., technicians, shift operators, repair technicians), the number of operating shift crews, and the positions for which reactor operator and senior reactor operator licenses are required. For multiunit stations, the organization chart (or additional charts) should clearly reflect planned changes and additions as new units are added to the station. The application should provide the schedule, relative to the fuel loading date for each unit, for filling all positions.

C.I.13.1.2.2 Plant Personnel Responsibilities and Authorities

In addition, the applicant should provide the following organizational information:

- (1) The application should describe the functions, responsibilities, and authorities of the following plant positions or their equivalents:
 - (a) plant managers
 - (b) operations supervisors
 - (c) operating shift crew supervisors
 - (d) shift technical advisors
 - (e) licensed operators
 - (f) nonlicensed operators
 - (g) technical supervisors
 - (h) radiation protection supervisors
 - (i) I&C maintenance supervisors
 - (j) equipment maintenance supervisors
 - (k) fire protection supervisors
 - (l) QA supervisors (when part of the plant staff) (addressed in Section 17.5 of this guide)

The application should describe for each position, where applicable, required interfaces with offsite personnel or positions identified in Section 13.1.1 of this guide. Such interfaces include defined lines of reporting responsibilities (e.g., from the plant manager to the immediate supervisor), lines of authority, and communication channels.

- (2) The application should describe the line of succession of authority and responsibility for overall station operation in the event of unexpected contingencies of a temporary nature, and the delegation of authority that may be granted to operations supervisors and to shift supervisors, including the authority to issue standing or special orders.
- (3) If the station contains, or there are plans that it contain, power generating facilities other than those specified in the application, including nonnuclear units, this section should also describe interfaces with the organizations operating the other facilities. The description should include any proposed sharing of personnel between the units, a description of their duties, and the proportion of their time that they routinely be assigned to nonnuclear units.

C.I.13.1.2.3 Operating Shift Crews

The application should describe the position titles, applicable operator licensing requirements for each, and the minimum numbers of personnel planned for each shift for all combinations of units proposed to be at the station in either operating or cold shutdown mode. The applicant should also describe shift crew

staffing plans unique to refueling operations. In addition, the application should describe the proposed means of assigning shift responsibility for implementing the radiation protection and fire protection programs on a round-the-clock basis.

C.I.13.1.3 Qualifications of Nuclear Plant Personnel

C.I.13.1.3.1 Qualification Requirements

This section of the FSAR should describe the education, training, and experience requirements (qualification requirements) established for each management, operating, technical, and maintenance position category in the operating organization described in Section C.I.13.1.2. This includes personnel who perform the preoperational and startup tests. RG 1.8 contains guidance on selection and training of personnel. The FSAR should specifically indicate a commitment to meet the regulatory position stated in this guide or provide an acceptable alternative. Where a clear correlation cannot be made between the proposed plant staff positions and those referenced by RG 1.8, this section should list each position on the plant staff along with the corresponding position referenced by RG 1.8 or with a detailed description of the proposed qualifications for that position.

C.I.13.1.3.2 Qualifications of Plant Personnel

As applicable, the application should present the qualification requirements of the initial appointees to (or incumbents of) plant positions for key plant managerial and supervisory personnel through shift supervisory level. The qualification requirements should be identified by position, title and, as a minimum, formal education, training, and experience (including NRC licensing).

C.I.13.2 Training

This section of the FSAR should contain the description and schedule of the training program for reactor operators and senior reactor operators. The licensed operator training program also includes the requalification programs as required in 10 CFR 50.54(i-1) and 10 CFR 55.59, "Requalification." Within 3 months after either the issuance of an operating license or the date the Commission makes the finding under 10 CFR 52.103(g) of this chapter for a COL, as applicable, the licensee must have in effect an operator requalification program.

In addition, this section of the FSAR should contain the description and schedule of the training program for nonlicensed plant staff.

C.I.13.2.1 Plant Staff Training Program

The FSAR should provide a description of the proposed training program in nuclear technology and other subjects important to safety for the entire plant staff. RG 1.8 provides guidance on an acceptable basis for relating training programs to plant staff positions. The FSAR should indicate whether this guidance is followed. If such guidance is not followed, the FSAR should describe the specific alternative methods that will be used along with a justification for their use. Section C.I.13.2.2 of this regulatory guide provides a list of regulations, guides, and reports pertaining to training of licensed and unlicensed nuclear power plant personnel.

C.I.13.2.1.1 Program Description

The program description should include the following information with respect to the formal training program in nuclear technology and other subjects important to safety (related technical training) for all plant management and supervisory personnel, licensed senior operator and licensed operator candidates, technicians, and general employees.

C.I.13.2.1.1.1 Licensed Plant Staff Training Program

- (1) The applicant should provide a description of the proposed training program (to be verified during construction).
- (2) The subjects covered in the training programs should include, as a minimum, the subjects in 10 CFR 55.31, "How to apply"; 10 CFR 55.41, "Written examination: Operators"; 10 CFR 55.43, "Written examination: Senior operators"; 10 CFR 55.45, "Operating tests"; and RG 1.8 for reactor operators and senior reactor operators as appropriate. The training program should also include provisions for upgrading reactor operator licenses and for licensing senior reactor operators who have not been licensed as reactor operators in accordance with RG 1.8. The training should be based on the use of the systems approach to training (SAT) as defined in 10 CFR 55.4, "Definitions."
- (3) The licensed operator requalification program should include the content described in 10 CFR 55.59 or be based on the use of a SAT as defined in 10 CFR 55.4 (to be verified during construction).
- (4) The applicant should describe its program for providing simulator capability for its plants as described in 10 CFR 55.31, 10 CFR 55.45, 10 CFR 55.46, "Simulation facilities," 10 CFR 50.34(f)(2)(I), and RG 1.149, "Nuclear Power Plant Simulation Facilities for Use in Operator Training and Licensing Examinations," and how its program meets these requirements and regulatory guidance. In addition, the applicant should describe how it ensures the proposed simulator correctly model its control room (to be verified during construction).
- (5) The applicant should describe the means for evaluating training program effectiveness for all licensed operators, in accordance with a SAT.
- (6) COL applicants should provide implementation milestones for the reactor operator training program (to be verified during construction).

C.I.13.2.1.1.2 Nonlicensed Plant Staff Training Program (to be verified during construction)

- (1) The application should include a detailed description of the training programs for nonlicensed personnel and the applicant's commitment to meet the guidelines of RG 1.8 for nonlicensed personnel.
- (2) The application should include a detailed description of the training programs developed using a SAT, as defined in 10 CFR 55.4, for all positions covered by 10 CFR 50.120.

- (3) The program is verified to distinguish between formal instruction and on-the-job training, before and after fuel loading. The description should include contingency plans for additional training (i.e., requalification and/or retraining) in the event that fuel loading is significantly delayed until after the date indicated in the FSAR. The program should also include provisions for training on modifications to plant systems or functions.
- The COL applicant should identify any difference in the training programs for individuals based on the extent of previous nuclear power plant experience. The structuring of training based on experience groups should appropriately address the following categories of personnel experience:
- (a) individuals with no previous experience
 - (b) individuals who have had nuclear experience at facilities not subject to licensing
 - (c) individuals who have had experience at comparable nuclear facilities
- The program should include a commitment to conduct an onsite formal training program and on-the-job training to have sufficient, qualified plant staff to ensure safe plant operations before the initial fuel loading.
- (4) The application should include a detailed description of the fire protection training and retraining for the initial plant staff and replacement personnel and a commitment to conduct an initial fire protection training program. The program should address the following:
- (a) the training planned for each member of the fire brigade
 - (b) the type and frequency of periodic firefighting drills, including during construction
 - (c) the training provided for all remaining staff members, including personnel responsible for maintenance and inspection of fire protection equipment
 - (d) the indoctrination and training provided for people temporarily assigned onsite duties during shutdown and maintenance outages, particularly persons allowed unescorted access
 - (e) the training provided for the fire protection staff members and verification of the program description of the course of instruction, the number of hours of each course, and the organization conducting the training
 - (f) provisions for indoctrination of construction personnel, as necessary
 - (g) a commitment to verify that initial fire protection training is completed prior to receipt of fuel at the site
- (5) The applicant's plans for conducting a position task analysis to verify that the tasks performed by persons in each position are defined, and the training, in conjunction with education and experience, is identified to provide assurance that the tasks can be effectively carried out.
- (6) For all plant personnel identified in FSAR Section 13.1.2, the application should include the proposed subject matter of each course and the titles of the positions for which the course is given.
- (7) The application should include a description of the provisions for training employees and nonemployees whose assistance may be needed in a radiological emergency, as required by Section II.F of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50.
- (8) The application should include a description of the training program for the individual(s) responsible for the formulation and assurance of the implementation of the fire protection program.

- (9) The application should identify the proposed means for evaluating the training program effectiveness for all employees and personnel covered by 10 CFR 50.120 in accordance with the SAT.
- (10) The application should describe the training program for employees and nonemployees to ensure the effective implementation of the physical protection program.

C.I.13.2.1.2 Coordination with Preoperational Tests and Fuel Loading

The FSAR should include a chart that shows the schedule of each part of the training program for each functional group of employees in the organization in relation to the schedule for preoperational testing, expected fuel loading, and expected time for examinations prior to plant criticality for licensed operators. In addition, the applicant should include contingency plans for individuals applying for licenses prior to criticality in the event fuel loading is substantially delayed from the date indicated in the FSAR.

C.I.13.2.2 Applicable NRC Documents

The NRC regulations, regulatory guides, and reports listed below provide information pertaining to the training of nuclear power plant personnel. The FSAR should indicate the extent to which the applicable portions of the guidance provided is used and should justify any exceptions. The applicant may reference in this section material discussed elsewhere in the FSAR.

- (1) 10 CFR Part 19
- (2) 10 CFR Part 26, "Fitness for Duty Programs"
- (3) 10 CFR Part 50
- (4) 10 CFR Part 50, Appendix E
- (5) 10 CFR Part 52
- (6) 10 CFR Part 55, "Operators' Licenses"
- (7) RG 1.8
- (8) RG 1.149
- (9) NUREG-0711, "Human Factors Engineering Program Review Model"
- (10) NUREG-1021, "Operator Licensing Examination Standards for Power Reactors"
- (11) NUREG-1220, "Training Review Criteria and Procedures"
- (12) GL 86-04, "Policy Statement on Engineering Expertise on Shift," issued February 1986

C.I.13.3 Emergency Planning

This section of the FSAR should describe the applicant's plans for coping with emergencies pursuant to Subpart C of 10 CFR Part 52, which sets out the requirements applicable to issuance of COLs for nuclear power facilities. Specifically, 10 CFR 52.77, 10 CFR 52.79, and 10 CFR 52.80 identify the requirements related to emergency plans that the COL application should address. The NRC's standards for review of applications and issuance of COLs are provided in 10 CFR 52.81, "Standards for Review of Applications"; 10 CFR 52.83, "Finality of Referenced NRC Approvals"; and 10 CFR 52.97, "Issuance of Combined Licenses." The COL application, which includes the FSAR and other information (e.g., State and local emergency plans), should also address the emergency planning requirements contained in 10 CFR 50.33(g), 10 CFR 50.34(f), and 10 CFR 52.79(a)(21). In addition, the COL application should address 10 CFR 50.54(t)(1), as it relates to implementation of the emergency preparedness (EP) program.

In addition, the application should address the requirements of 10 CFR 50.47, "Emergency plans," including the 16 standards in 10 CFR 50.47(b), 10 CFR 50.72(a)(3), 10 CFR 50.72(a)(4), 10 CFR 50.72(c)(3), 10 CFR 73.71, the requirements in Appendix E to 10 CFR Part 50, and the

Commission Orders of February 25, 2002, relating to security events, so that the staff can make a positive finding that there is reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency, including a security event. NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," issued November 1980 (supplemented by a March 2002 addenda), which is a joint NRC and the Federal Emergency Management Agency (FEMA) document, establishes an acceptable basis for NRC licensees and State and local governments to develop integrated radiological emergency plans and improve their overall EP state. RG 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," endorses the criteria and recommendations in NUREG-0654/FEMA-REP-1, Revision 1, as methods acceptable to the NRC staff for complying with the standards in 10 CFR 50.47. The applicant should specify the revision number and date of RG 1.101 used.

As required by 10 CFR 50.47(b)(4), an applicant must have a standard emergency classification and action level scheme. Section IV.C of Appendix E to 10 CFR Part 50 identifies the four emergency classes. Section IV.B of Appendix E also requires EALs. The emergency plan should include the emergency classification level scheme described in Appendix 1 and Supplement 3, "Criteria for Protective Action Recommendations for Severe Accidents," to NUREG-0654/FEMA-REP-1, Revision 1, issued July 1996. It is expected that any new application will use an emergency action level (EAL) scheme similar to that described in Revision 4 of Nuclear Energy Institute (NEI) 99-01, "Methodology for Development of Emergency Action Levels," issued January 2003, which was endorsed in Revision 4 of RG 1.101. However, Revision 4 of NEI 99-01 is not considered to be entirely applicable to advanced LWR designs. Even though the majority of Revision 4 of NEI 99-01 may be applicable to any reactor design and should be used, the unique characteristics of the new reactor should be addressed in the development of EALs specific to the new plant and the site. Section IV.B of Appendix E to 10 CFR Part 50 also requires that the initial emergency actions be discussed and agreed on by the State and local governmental authorities. The applicant should provide some form of confirmation of the agreement, such as a letter signed by State and local governmental authorities, in the emergency plan, if the applicant provides EAL different from those for the existing reactor(s) on the site.

As addressed in Section C.I.2, the information provided in the application should also contribute to a determination that the exclusion area and the LPZ for the site comply with 10 CFR Part 100 and address whether there are significant impediments to the development of emergency plans, as required by 10 CFR 100.21(g). It is acceptable to satisfy this requirement by referencing the appropriate sections of the FSAR that address site characteristics.

In addition, the application should provide a projection of the population within the 10-mile EPZ throughout the requested duration of the application; including a discussion of the sources of information and methodology that supports the population projection. The application should specifically address whether the projected population creates a significant impediment to the development of emergency plans over the requested duration of the ESP application, including how it would affect the evacuation time estimate (ETE). If a significant impediment is created, then the applicant should identify measures that would, when implemented, mitigate or eliminate the significant impediment.

FEMA is the federal agency with the lead responsibility for oversight of offsite nuclear emergency planning and preparedness. These responsibilities are executed by the Radiological Emergency Preparedness (REP) Program. While the responsibility for evaluating the emergency plans and procedures is shared between the FEMA and the NRC under a memorandum of understanding, the final decision making authority on the overall adequacy of emergency planning and preparedness rests with the NRC. In addition to the NRC's regulations (described above), the COL application needs to include the applicable State, Tribal, and local plans that address the relevant FEMA requirements contained in 44 CFR Part 350,

“Review and Approval of State and Local Radiological Emergency Plans and Preparedness”; 44 CFR Part 351, “Radiological Emergency Planning and Preparedness”; and 44 CFR Part 352, “Commercial Nuclear Power Plants: Emergency Preparedness Planning,” as well as associated REP guidance documents.

Where an applicant is unable to make arrangements with State and local governmental agencies with emergency planning responsibilities and obtain the certifications required by 10 CFR 52.79(a)(22)(i), due to nonparticipation of State and/or local governments, the applicant should discuss its efforts to make such arrangements and describe any compensatory measures the applicant has taken or plans to take because of the lack of such arrangements. To the extent that State and local governments fail to participate, the application must contain information and a utility plan in accordance with 10 CFR 52.79(a)(22)(ii) and 10 CFR 50.47(c)(1). The utility plan must demonstrate compliance with the offsite emergency planning requirements, sufficient to show that the proposed plans nonetheless provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the site. Applicants should consult Supplement 1, “Criteria for Utility Offsite Planning and Preparedness,” to NUREG-0654/FEMA-REP-1, Revision 1, issued November 1987, to develop offsite plans and preparedness when State and/or local governments decline to participate in emergency planning and preparedness.

Pursuant to 10 CFR 52.73, “Relationship to other subparts,” the FSAR may reference an ESP for the proposed site or a certified design, or both, and thereby incorporate the emergency planning aspects approved in those prior licensing actions into the COL application. The FSAR should address any conditions or requirements in the referenced ESP or certified design that relate to emergency planning, such as COL action items, permit conditions, or ITAAC. For a referenced ESP, 10 CFR 52.79(b)(4) requires that the applicant must include any new or additional information that updates or corrects the information that was provided under 10 CFR 52.17(b), and discuss whether the new or additional information materially changes the bases for compliance with the applicable requirements. If the proposed facility emergency plans incorporate existing emergency plans or major features of emergency plans, the application must identify changes to the emergency plans or major features of emergency plans, following issuance of the ESP, that have been incorporated into the proposed facility emergency plans, and that constitute or would constitute a decrease in effectiveness under 10 CFR 50.54(q). As stated in 10 CFR 52.79(b)(5), if complete and integrated emergency plans are approved as part of the ESP, new certifications meeting the requirements of 10 CFR 52.79(a)(22) are not required; however, the NRC does require updates to incorporate new and significant information.

C.I.13.3.1 Combined License Application and Emergency Plan Content

At the COL application stage, the applicant should submit a comprehensive (i.e., complete and integrated) emergency plan. This plan should be a physically separate document identified as Section 13.3 of the FSAR, and may incorporate by reference various State and local emergency plans or other relevant materials. The application should include a copy of all referenced plans or other materials that serve to establish compliance with the emergency planning standards and requirements, including an analysis of the time required to evacuate and for taking other protective actions for various sectors and distances within the plume exposure pathway emergency planning zone (EPZ) for transient and permanent populations (i.e., an ETE). The application should also include a table of contents and a cross-reference to applicable regulatory requirements, guidance documents, generic communications, and other criteria that are used to develop the application and emergency plan. The cross-reference should indicate where the applicant’s plans address specific criteria in 10 CFR 50.72(a)(3), 10 CFR 50.72(a)(4), 10 CFR 50.72(c)(3), Appendix E to 10 CFR Part 50, 10 CFR 73.71, and NUREG-0654/FEMA-REP-1, Revision 1. The intent of this cross-reference is to aid in the review process and facilitate the coordinated development and review of emergency plans that are part of the application.

The emergency plan, including implementing procedures (if applicable), should address the standards and requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50. Ordinarily, lower tier documents such as emergency planning implementing procedures (EPIPs) are not considered to be part of the emergency plan. However, any relocation from an emergency plan of an EP requirement to a lower tier document must be explained.¹ The plan should describe the location of relocated information; the applicant should administratively control the plan to ensure that subsequent changes to those documents are reviewed in accordance with 10 CFR 50.54(q). If detailed EPIPs are not submitted at the time of the COL application, the applicant may address the requirement in Part V of Appendix E for the submission of detailed emergency plan implementing procedures as either a proposed license condition or an emergency planning ITAAC (see Section C.I.13.3.3 of this guide and ITAAC 17.1 in Table B1 of Section C.II.1, Appendix B).

The applicant should address the various generic communications and Commission orders that are in effect and applicable to emergency planning in support of an operating license (see the list of Generic Communications identified in Section C.I.13.3.4 of this guide).² The emergency plan should address any subsequently issued generic letters and Commission orders that pertain to emergency planning and preparedness. Sections C.I.1 and C.IV.8 provide additional guidance associated with GSI and generic communications.

Under 10 CFR 50.34(f), an application for a COL must demonstrate compliance with the technically relevant portions of the requirements in 10 CFR 50.34(f)(1) through 10 CFR 50.34(f)(3). For those applicants that are subject to 10 CFR 50.34(f), the application must address the TMI-related requirements in 10 CFR 50.34(f)(2)(iv), 10 CFR 50.34(f)(2)(viii), 10 CFR 50.34(f)(2)(xvii), and 10 CFR 50.34(f)(2)(xxv). These requirements may be met by satisfying the comparable requirements in 10 CFR 50.47 and Appendix E to 10 CFR Part 50. The applicant should consult Supplement 1, "Requirements for Emergency Response Capability," to NUREG-0737, issued January 1983, regarding TMI-related items.

The FSAR should also address an emergency classification and action level scheme, as required by 10 CFR 50.47(b)(4). Revisions 2, 3, and 4 of RG 1.101 address the various EAL schemes that the staff finds acceptable for complying with NRC's regulations. The applicant may propose means other than those specified in RG 1.101. The proposal should describe and justify how the proposed method meets the applicable regulations.

The applicant should address the NRC orders issued February 25, 2002, as well as any subsequent NRC guidance (or any NRC endorsed industry guidance developed in response to issues related to implementation of the orders), to determine what security-related aspects of emergency planning and preparedness be addressed in the emergency plan. Any information submitted to the NRC that is proprietary, sensitive, or safeguards related should be marked appropriately as required by 10 CFR 2.390. (Section C.I.13.6 also addresses security-based events and considerations.)

In accordance with 10 CFR 52.79(a)(41), the application must include an evaluation of the facility against the SRP (i.e., NUREG-0800) revision in effect 6 months prior to the docket date of the application. For those aspects of the emergency plan that differ from the SRP acceptance criteria, the applicant must

¹ See RIS 2005-02, "Clarifying the Process for Making Emergency Plan Changes," dated February 14, 2005.

² See also 10 CFR 52.79(a)(37), which requires that a COL application contain information that demonstrates how operating experience insights from generic letters and bulletins issued up to 6 months before the docket date of the application, or comparable international operating experience, have been incorporated into the plant design.

identify and describe the differences and discuss how the proposed alternative provides an acceptable method of complying with the applicable rules or regulations that underlie the corresponding SRP acceptance criteria.

Emergency planning information (including supporting organization agreements) submitted in support of a COL application, as well as incorporated elements of an existing emergency plan for multiunit sites (discussed below), should (1) be applicable to the proposed site, (2) be up to date when the application is submitted, and (3) reflect use of the proposed site for possible construction of a new reactor (or reactors). The application should include adequate justification (e.g., an appropriate explanation or analysis) in support of the use of such information. The application should also address how the proposed plan incorporates existing elements, as it relates to expanding the existing program to include one or more additional reactors, and identify any impact on the adequacy of the existing EP program for the operating reactor(s).

The application should include copies of letters of agreement (or other certifications) from the State and local governmental agencies with emergency planning responsibilities. The agreements should clearly address the future presence of an additional reactor (or reactors) at the site. The application should discuss any ambiguous or incomplete language in the agreements. If an existing letter of agreement is broad enough to cover an expanded site use and does not need to be revised, the application should also include a separate correspondence (or other form of communication with the organization) that addresses the new reactor(s) and the organization's acceptance of expanded responsibilities.

C.I.13.3.2 Emergency Plan Considerations for Multi-unit Sites

If the new reactor is located on, or near, an operating reactor site with an existing emergency plan (i.e., multiunit site), and the emergency plan for the new reactor includes various elements of the existing plan, the application should do the following:

- (1) Address the extent to which the existing site's emergency plan is credited for the new unit(s), including how the existing plan would be able to adequately accommodate an expansion to include one or more additional reactors and include any required modification of the existing emergency plan for staffing, training, emergency action levels, and the like.
- (2) Include a review of the proposed extension of the existing site's emergency plan pursuant to 10 CFR 50.54(q), to ensure that the addition of a new reactor(s) would not decrease the effectiveness of the existing plans and the plans, as changed, would continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.
- (3) Describe any required updates to existing emergency facilities and equipment, including the alert notification system.
- (4) Incorporate any required changes to the existing onsite and offsite emergency response arrangements and capabilities with State and local authorities or private organizations.
- (5) Justify the applicability of the existing 10-mile plume exposure EPZ and 50-mile ingestion control EPZ.
- (6) Address the applicability of the existing ETE or provide a revised ETE, if appropriate.
- (7) If applicable, address the exercise requirements for collocated licensees, in accordance with Section IV.F.2.c of Appendix E to 10 CFR Part 50, and the conduct of EP activities and interactions discussed in RG 1.101.

- (8) If applicable, include ITAAC which will address any changes to the existing emergency plans, facilities and equipment, and programs that are to be implemented, along with a proposed schedule.
- (9) Describe how emergency plans, to include security, is integrated and coordinated with emergency plans of adjacent sites.

C.I.13.3.3 Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria

As required by 10 CFR 52.80(a), an application for a COL must include proposed emergency planning ITAAC that are necessary and sufficient to provide reasonable assurance that, if the licensee performs inspections, tests, and analyses and meets the acceptance criteria, the facility has been constructed and will operate in conformity with the COL, the provisions of the Atomic Energy Act, and the NRC's regulations.

The COL applicant's emergency planning ITAAC needs to address implementation of elements of the emergency plan, in accordance with the guidance provided in Sections C.I.14 and C.II.1 of this regulatory guide. This section of the FSAR should reference the emergency planning ITAAC developed for the COL application. Table C.II.1-B1 of Section C.II.1, Appendix B, provides an acceptable set of generic emergency planning ITAAC that an applicant may use to develop application-specific ITAAC tailored to the specific reactor design and emergency planning program requirements. A shorter set of ITAAC is acceptable if the application contains information that fully addresses EP requirements associated with any of the generic ITAAC in Table C.II.1-B1 of Section C.II.1, Appendix B, that are not used.³ Table C.II.1-B1 is not all inclusive or exclusive of other ITAAC an applicant may propose. Additional plant-specific emergency planning ITAAC (i.e., beyond those listed in Table B1) may be proposed on a case-by-case basis.

Section C.I.14.3 provides a discussion on ITAAC proposed in a COL application. The COL applicant should also refer to the guidance provided in Section C.II.1 for development of ITAAC proposed for a COL application.

C.I.13.4 Operational Program Implementation

Operational programs are specific programs that are required by regulations. Section C.IV.4 of this regulatory guide provides further guidance on programs that are classified as operational programs. The COL applications should fully describe operational programs, as defined in SECY-05-0197. In accordance with Commission direction in the SRM associated with SECY-05-0197, COL applicants should also provide schedules for implementation of these operational programs, as discussed below.

The COL applicant should provide commitments for implementation of operational programs that are required by regulation. This regulatory guide provides Table 13.4-1 as an example to demonstrate a suitable method of providing this information. The applicable sections of the FSAR should provide descriptions of the operational programs in the attached table. The implementation milestone commitments for these operational programs (e.g., prior to fuel load, at fuel load, prior to exceeding 5-percent power) should be provided in a table similar to the example table provided. In some instances, programs may be implemented in phases, where practical, and the applicant should include the phased implementation milestones in the attached table. For example, radiation protection program implementation milestones may be based on radioactive sources on site, fuel on site, fuel load, and first shipment of radioactive waste.

³ See SECY-05-0197 and its associated SRM dated February 22, 2006. The generic emergency planning ITAAC in SECY-05-0197 formed the basis for Table C.II.1-B1.

If these programs and their implementation are fully described, they will not require inclusion of ITAAC in the COL application. Non-programmatic aspects of EP, security, and the fire protection program (e.g., fire detection/suppression systems and fire barriers), are subject to ITAAC. The review of ITAAC is performed under SRP Section 14.3.

In this context, “fully described” indicates that the program is clearly and sufficiently described in terms of the scope and level of detail to allow a reasonable assurance finding of acceptability. Applicants should always describe required programs at a functional level and at an increased level of detail when implementation choices could materially and negatively affect the program effectiveness and acceptability.

Section C.II.1 of this regulatory guide provides guidance on ITAAC development.

**Sample FSAR Table 13.4–1
Operational Programs Required by NRC Regulation and Program Implementation**

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section ¹ | Implementation | |
|------|--|--|---------------------------------------|---|--|
| | | | | Milestone | Requirement |
| 1. | Inservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4 6.6 | Commercial service | 10 CFR 50.55a(g) ASME Section XI IWA 2430(b) |
| 2. | Inservice Testing Program | 10 CFR 50.55a(f) 10 CFR Part 50, App. A | 3.9.6 5.2.4 | After generator online on nuclear heat | 10 CFR 50.55a(f) ASME OM Code |
| 3. | Environmental Qualification Program | 10 CFR 50.49(a) | 3.11 | None specified | License Condition |
| 4. | Preservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4 6.6 | Completion prior to initial plant startup | 10 CFR 50.55a(g) ASME Code Section XI IWB-2200(a) |
| 5. | Reactor Vessel Material Surveillance Program | 10 CFR 50.60 10 CFR Part 50, App. H | 5.3.1 | None specified | License Condition |
| 6. | Preservice Testing Program | 10 CFR 50.55a(f) | 3.9.6 | None specified | License Condition |
| 7. | Containment Leakage Rate Testing Program | 10 CFR 50.54(o) 10 CFR 50, App. A (GDC 32) 10 CFR 50, App. J 10 CFR 52.47(a)(1) | 6.2.6 | Fuel load | 10 CFR Part 50, App. J Option A-Section III Option B-Section III.A |
| 8. | Fire Protection Program | 10 CFR 50.48 | 9.5.1 | None specified | License Condition |

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section ¹ | Implementation | |
|------|--|--|---------------------------------------|---|-----------------------------|
| | | | | Milestone | Requirement |
| 9. | Process and Effluent Monitoring and Sampling Program: | 10 CFR 20.1301 and 20.1302 10 CFR 50.34a 10 CFR 50.36a 10 CFR 50, App. I, Sect. II and IV | 11.5 | None specified | License Condition |
| | Radiological Effluent Technical Specifications/Standard Radiological Effluent Controls | | | | |
| | Offsite Dose Calculation Manual | | | | |
| | Radiological Environmental Monitoring Program | | | | |
| | Process Control Program | Same as above | 11.4 | None specified | License Condition |
| 10. | Radiation Protection Program | 10 CFR 20.1101 | 12.5 | None specified | License Condition |
| 11. | Nonlicensed Plant Staff Training Program | 10 CFR 50.120 10 CFR 52.79(a)(33) | 13.2.2 | 18 mos. prior to scheduled fuel load | 10 CFR 50.120(b) |
| 12. | Reactor Operator Training Program | 10 CFR 55.13 10 CFR 55.31 10 CFR 55.41 10 CFR 55.43 10 CFR 55.45 | 13.2.1 | None specified | License Condition |
| 13. | Reactor Operator Requalification Program | 10 CFR 50.34(b) 10 CFR 50.54(i) 10 CFR 55.59 | 13.2.1 | Within 3 mos. after issuance of an operating license or the date, the Commission makes the finding under 10 CFR 52.103(g) | Proposed 10 CFR 50.54 (i-1) |

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section ¹ | Implementation | |
|------|--------------------|---|---------------------------------------|--|---|
| | | | | Milestone | Requirement |
| 14. | Emergency Planning | 10 CFR 50.47 10 CFR Part 50, App. E | 13.3 | <p>Full participation exercise conducted within 2 yrs before the issuance of first full power operating license</p> <p>Onsite exercise conducted within 1 yr before issuance of full power operating license</p> <p>Applicants detailed implementing procedures for its emergency plan submitted no less than 180 days prior to scheduled issuance of an operating license</p> <p>Full participation exercise conducted within 2 yrs of scheduled date for initial loading of fuel</p> <p>Onsite exercise conducted within 1 yr before the schedule date for initial loading of fuel</p> <p>Applicant's detailed implementing procedures for its emergency plan submitted no less than within 180 days prior to scheduled date for initial loading of fuel</p> | <p>Proposed 10 CFR Part 50, App. E.IV.F.2a(i) (10 CFR Part 50 applicant)</p> <p>Proposed 10 CFR Part 50, App. E.IV.F.2a(i) (10 CFR Part 50 applicant)</p> <p>Proposed 10 CFR Part 50, App. E.V (10 CFR Part 50 applicant)</p> <p>Proposed 10 CFR Part 50, App. E.IV.F.2a(ii) (10 CFR Part 52 applicant)</p> <p>Proposed 10 CFR Part 50, App. E.IV.F.2a(ii) (10 CFR Part 52 applicant)</p> <p>Proposed 10 CFR Part 50, App. E.V (10 CFR Part 52 applicant)</p> |

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section ¹ | Implementation | |
|------|--|--|---------------------------------------|---|---|
| | | | | Milestone | Requirement |
| 15. | Security Program: Physical Security Program Safeguards Contingency Program Training and Qualification Program | 10 CFR 50.34(c) 10 CFR 73.55 10 CFR 73.56 10 CFR 73.57 10 CFR Part 26 10 CFR 50.34(d) 10 CFR Part 73, App. C 10 CFR Part 73, App. B | 13.6 | None specified | License Condition License Condition License Condition |
| 16. | Quality Assurance Program—Operation | 10 CFR 50.54(a) 10 CFR Part 50, App. A (GDC 1); 10 CFR Part 50, App. B | 17.5 | 30 days prior to scheduled date for the initial loading of fuel | Proposed 10 CFR 50.54(a)(1) |
| 17. | Maintenance Rule | 10 CFR 50.65 | 17.6 | Fuel load authorization per 10 CFR 52.103(g) | Proposed 10 CFR 50.65(a)(1) |
| 18. | Motor-Operated Valve Testing | 10 CFR 50.55a(b)(3)(ii) | 3.9.6 | None specified | License Condition |
| 19. | Initial Test Program | 10 CFR 50.34 10 CFR 52.79(a)(28) | 14.2 | None specified | License Condition |

¹ Additional FSAR (SRP) sections may be identified under broad operational programs required by regulation (e.g., ISI, IST, etc.).

C.I.13.5 Plant Procedures

This section of the FSAR should describe administrative and operating procedures that the operating organization (plant staff) use to ensure that routine operating, off-normal, and emergency activities are conducted in a safe manner. In general, the FSAR is not expected to include detailed written procedures. The FSAR should provide a brief description of the nature and content of the procedures and a schedule for the preparation of appropriate written administrative procedures (see Section 13.5.1.1). The FSAR should delineate in the description of administrative procedures the functional position for procedural revision and approval prior to implementation.

C.I.13.5.1 *Administrative Procedures*

This section of the FSAR should describe administrative procedures that provide administrative control over activities that are important to safety for operation of the facility. RG 1.33 contains guidance on facility administrative policies and procedures. The FSAR should specifically indicate whether the applicable portions of RG 1.33 concerning plant procedures are followed. If such guidance is not followed, the FSAR should describe specific alternative methods that will be used and the manner of implementing them.

C.I.13.5.1.1 *Administrative Procedures—General*

This section of the FSAR should describe (1) those procedures that provide the administrative controls with respect to procedures and (2) those procedures that define and provide controls for operational activities of the plant staff as described below:

Category A—Controls

- (1) procedures review and approval
- (2) equipment control procedures
- (3) control of maintenance and modifications
- (4) fire protection procedures
- (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, licensed senior reactor operator in the control room, control room operator, and shift technical advisor
- (2) assignment of shift personnel to duty stations and definition of “surveillance area”
- (3) shift relief and turnover
- (4) fitness for duty
- (5) control room access
- (6) limitations on work hours
- (7) feedback of design, construction, and applicable important industry and operating experience
- (8) shift supervisor administrative duties
- (9) verification of correct performance of operating activities

C.I.13.5.2 *Operating and Maintenance Procedures*

C.I.13.5.2.1 Operating and Emergency Operating Procedures

This section should describe primarily the procedures that licensed operators perform in the control room. The application should identify these operating procedures by types and include them in a described classification system. The general format and content for each class should be described (to be verified during construction). The following categories should be included, but need not necessarily form the basis for classifying these procedures:

(1) Procedure Classification

The FSAR or other submittal should describe the different classifications of procedures the operators use in the control room and locally in the plant for plant operations. This section should identify the group within the operating organization responsible for maintaining the procedures and should describe the general format and content of the different classifications. It is not necessary that each applicant's procedures conform precisely to the same classification since the objective is to ensure that procedures are available to the plant staff to accomplish the functions contained in the listing of RG 1.33. For example, some licensees prefer a classification of abnormal operating procedures, whereas others may use off-normal condition procedures. The following are examples of classifications:

- (a) System Procedures. Procedures that provide instructions for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation, returning to service following testing or maintenance (if not given in the applicable procedure), and other instructions appropriate for operation of systems important to safety.
- (b) General Plant Procedures. Procedures that provide instructions for the integrated operation of the plant (e.g., startup, shutting down, shutdown, power operation and load changing, process monitoring, fuel handling, maintenance, surveillance, and periodic testing).
- (c) Off-Normal Condition Procedures. Procedures that specify operator actions for restoring an operating variable to its normal controlled value when it departs from its normal range or to restore normal operating conditions following a transient. Such actions are invoked following an operator observation or an annunciator alarm indicating a condition which, if not corrected, could degenerate into a condition requiring action under an emergency operating procedure (EOP).
- (d) Emergency Operating Procedures. Procedures that direct actions necessary for the operators to mitigate the consequences of transients and accidents that cause plant parameters to exceed reactor protection system or ESF actuation setpoints.
- (e) Alarm Response Procedures. Procedures that guide operator actions for responding to plant alarms.

(2) Operating Procedure Program

The FSAR or other submittal should describe the applicant's program for developing operating procedures (1.a–e, above).

(3) Emergency Operating Procedure Program

The FSAR or other submittal (e.g., the procedures generation package (PGP)) should describe the applicant's program for developing EOPs as well as the required content of the EOPs.

The applicant should submit the procedure development program, as described in the PGP for EOPs, to the NRC at least 3 months prior to the date the applicant plans to begin formal operator training on the EOPs. The PGP should include the following:

- (1) Plant-specific technical guidelines (P-STGs), which are guidelines based on analysis of transients and accidents that are specific to the applicant's plant design and operating philosophy, provide the basis for, and include reference to, generic guidelines if used.

For plants not referencing generic guidelines, this section of the submittal should contain the action steps necessary to mitigate transients and accidents in a sequence that allows mitigation without prior diagnosis of the specific event, along with all supporting analyses, to meet the requirements of TMI Action Plan Item I.C.1 (see NUREG-0737 and Supplement 1 to NUREG-0737).

For plants referencing generic guidelines, the submitted documentation should include (a) a description of the process used to develop plant-specific guidelines from the generic guidelines, (b) identification of significant deviations from the generic guidelines (including identification of additional equipment beyond that identified in the generic guidelines), along with all necessary engineering evaluations or analyses to support the adequacy of each deviation, and (c) a description of the process used for identifying operator information and control requirements.

- (2) A plant-specific writer's guide that details the specific methods to be used by the applicant in preparing EOPs based on P-STGs should be included.
- (3) A description of the program for verification and validation of EOPs should be included.
- (4) A description of the program for training operators on EOPs should be included.

C.I.13.5.2.2 Maintenance and Other Operating Procedures

This section should describe how other operating and maintenance procedures are classified, what group or groups within the operating organization have the responsibility for following each class of procedures, and the general objectives and character of each class and subclass. The categories of procedures listed below should be included (if their general objectives and character are described elsewhere in the FSAR or the application, they may be described by specific reference thereto):

- (1) plant radiation protection procedures
- (2) EP procedures
- (3) instrument calibration and test procedures
- (4) chemical-radiochemical control procedures
- (5) radioactive waste management procedures
- (6) maintenance and modification procedures
- (7) material control procedures
- (8) plant security procedures

C.I.13.6 Security

C.I.13.6.1 Physical Security - Combined License

This section of the COL application should include a discussion indicating that a security plan has been prepared and submitted separately to the NRC. The details of a plant's overall security plan should include a description of the elements of the individual security plans (e.g., physical security, training and qualification, and safeguards contingency) proposed by a COL applicant, as required by 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage." In addition, the security plan for a COL applicant should describe the proposed site

security provisions implemented during construction of a new plant that is either inside an existing protected area, owner-controlled area, or is a greenfield site.

Licensees of nuclear power plants that are licensed to 10 CFR Part 50 requirements have implemented security requirements based on a generic security plan template provided in NEI 03-12. The NRC considers the guidance provided in NEI 03-12 to be acceptable and has endorsed it. COL applicants should provide information regarding their security plan that is consistent with NEI 03-12. In addition, NEI 03-01 provides guidance acceptable to NRC for access authorization and fitness for duty programs, and NEI 03-09 provides acceptable guidance for security officer training programs. The guidance provided in the above referenced NEI documents are not requirements and COL applicants may follow alternative approaches to provide security information suitable for complying with the applicable regulations, however, applicants need to describe and provide justification for the suitability of any alternative approaches.

The COL applicant should refer to its security plan and the security assessment in Chapter 13 of the FSAR and incorporate it by reference in the COL application. The applicant should submit the security plan and security assessment information referenced in the COL application separately. The NRC will withhold the COL applicant's security plan information from public disclosure in accordance with the provisions of 10 CFR 73.21, "Requirements for Protection of Safeguards Information."

The COL applicant should identify the schedule implementation requirements associated with the elements of its security plan and security assessment, as discussed in Section 13.4.

In addition, the COL applicant should address, in this section, any COL action items or information items applicable to the security plan and security assessment that may have been established for ESPs and/or certified designs that are referenced in the COL application.

The COL applicant should also submit the following information:

- a proposed schedule for implementing the site's operational security programs, security systems and equipment, and physical barriers
- proposed ITAAC for physical security hardware (Sections C.I.14.3 and C.II.1 of this regulatory guide provide guidance on development of ITAAC)

C.I.13.6.2 *Physical Security - Design Certification*

Not applicable

C.I.13.6.3 *Physical Security - Early Site Permit*

Not applicable

C.I.13.7 Fitness for Duty

Pursuant to 10 CFR 52.79(a)(44), COL applications must contain "[a] description of the fitness-for-duty program required by 10 CFR Part 26 and its implementation." Under 10 CFR Part 26, licensees under 10 CFR Part 52 must have a fitness-for-duty program for an operating plant. Part 26 does not require licensees under 10 CFR Part 52 to have a fitness-for-duty program during construction. Applicants should note that 10 CFR Part 26 is being revised by the NRC. Upon the effective date of the new Part 26, licensees under 10 CFR Part 52 will be required to have a fitness-for-duty program during construction as well as for the operating plant. Therefore, a COL application is required to include a description of the applicant's fitness-for-duty programs during construction and for the operating plant. If the revisions to 10 CFR Part 26

become effective after the date that a COL application is submitted to the NRC, then that applicant must amend its application to the extent necessary to satisfy the requirements of 10 CFR 52.79(a)(44) and the new 10 CFR Part 26. The NRC expects to amend RG 1.206 to incorporate the requirements of the new Part 26.