



Enclosure 3

- NRC Slide Presentation
- Part 26 Subpart I Implementation Status
- **Dated June 16th, 2009**



Part 26 Subpart I Implementation Status

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Part 26 Subpart I Implementation

Agenda

9:00 – 9:15

Welcome/Introductions

9:15 – 10:00

- Purpose
- Status of NRC Subpart I Activities
- Other items

10:00 – 10:15

Break

10:15 – 11: 45

Industry and Public Comments

11:45 – 11:55

Summary

11:55 – 12:00

Closing Remarks



Part 26 Subpart I Implementation

Purpose

- Provide status of NRC activities related to our efforts regarding Subpart I
- Understand from stakeholders the progress of industry implementation of Subpart I, including any challenges associated with implementation

Part 26 Subpart I Implementation

Summary (1)

1. Engage the industry and public to solicit feedback regarding efforts to implement Subpart I
2. Conduct an inspector training development session for implementing inspection procedures
3. Provide training to NRC inspectors at the Resident Inspector Counterpart Meetings
4. Support an NEI fatigue management implementation lessons learned workshop
5. Minimize unnecessary impact on schedules of covered individuals during resolution of an inspector's questions

Part 26 Subpart I Implementation

Summary (2)

6. Implement a review panel to ensure regulatory consistency
7. Accelerate staff's review of technical specifications amendment requests related to managing fatigue
8. 50.54(p) Security Plan Reviews
9. Relax the April 29, 2003, NRC Order regarding security officer work hour controls
10. Make more extensive and timely use of the Part 26 Frequently-Asked-Questions (FAQ) website

Part 26 Subpart I Implementation

Summary (3)

11. Make Subpart I related draft inspection procedures and inspection manual chapters available
12. Enhance Inspection Manual Chapter 0612, Appendix E to include Subpart I examples
13. Perform a Temporary Instruction (TI) inspection of Subpart I requirement at all utilities
14. Address potential Subpart I implementation and ROP integration issues

Part 26 Subpart I Implementation

Status

1. Engage the industry and public to solicit feedback regarding efforts to implement Subpart I
 - Ongoing
 - Two additional public meetings are scheduled prior to October 1, 2009
 - July 15th
 - September 17th
 - Site visits to view pilot implementation
 - McGuire, May 13th
 - Beaver Valley, July 24th

Part 26 Subpart I Implementation

Status

2. Conduct an inspector training development session for implementing inspection procedures.
 - Complete
 - A training development session was performed on May 5, 2009 to develop Subpart I training for inspectors
 - A pilot training session was held on December 16 and 17, 2008 to facilitate inspector FFD inspection training development

Part 26 Subpart I Implementation

Status

3. Provide training to NRC inspectors at the Resident Inspector Counterpart Meetings
 - Ongoing
 - The training will occur for each of the Regions during the May through June, 2009 time period

Part 26 Subpart I Implementation

Status

4. Support an NEI fatigue management implementation lessons learned workshop
 - Planned
 - NRC staff will attend
 - The workshop is targeted for late summer

Part 26 Subpart I Implementation

Status

5. Minimize unnecessary impact on schedules of covered individuals during resolution of an inspector's questions
 - Ongoing
 - One aspect: time period between an evolutionary Subpart I observation and finding
 - Staff will be engaged to understand more about industry concerns with this issue

Part 26 Subpart I Implementation

Status

6. Implement a review panel to ensure regulatory consistency
 - Ongoing
 - The organization of a review panel and its internal processes is progressing

Part 26 Subpart I Implementation

Status

7. Accelerate staff's review of technical specifications amendment requests related to managing fatigue
 - Ongoing
 - TSTF 511, Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26 is currently available

Part 26 Subpart I Implementation

Status

8. 50.54(p) Security Plan Reviews

- Ongoing
- NSIR staff review not expected on licensee changes

Part 26 Subpart I Implementation

Status

9. Relax the April 29, 2003, NRC Order regarding security officer work hour controls
 - In progress
 - A letter to licensees is being prepared that enables two options:
 - Relaxation upon receipt of a licensee letter of Subpart I implementation
 - Relaxation on October 1, 2009

Part 26 Subpart I Implementation

Status

10. Make more extensive and timely use of the Part 26 Frequently-Asked-Questions (FAQ) website
 - Ongoing
 - Questions submitted via the FitnessForDuty.Resource@nrc.gov email address or the Part 26 "Contact Us" web page regarding fatigue management are targeted for reply in 10 days or less
 - If appropriate, the question and response will be posted to the Fitness-for-Duty Frequently Asked Question web page

Part 26 Subpart I Implementation

Status

11. Make Subpart I related draft inspection procedures and inspection manual chapters available
 - Planned
 - An NRR Temporary Instruction and Inspection Procedures to be finalized in August 2009
 - The procedures will be made available to the public prior to August
 - Procedures designated security-related information will not be released



Part 26 Subpart I Implementation

Status

12. Enhance Inspection Manual Chapter 0612,
Appendix E to include Subpart I examples
 - In progress

Part 26 Subpart I Implementation

Status

13. Perform a Temporary Instruction (TI) inspection of Subpart I requirement at all utilities
 - Planned
 - A temporary instruction is planned to be completed within one year of implementation
 - Planned to be performed at each utility

Part 26 Subpart I Implementation

Status

14. Address potential Subpart I implementation and ROP integration issues
 - Ongoing
 - After October 1st staff will attend the monthly ROP public meetings

Part 26 Subpart I Implementation

Non-outage Hours

Minimum Number of Individuals Per Shift Working Non-outage Schedules for Onsite Staffing of Operating Nuclear Power Units during Outages								
Number of operating nuclear power units ¹	Position	Two-unit site		Three-unit site				
		One Control Room	Two Control Rooms	Two control rooms				Three Control Rooms
				Single Control Room Unit in Outage	Single Control Room Unit and 1 Unit Served by Dual Control Room in Outage	1 of the 2 Units Served by Dual Control Room in Outage	2 Units Served by Dual Control Room in Outage	
One	Senior Operator	2	2		2		2	2
	Operator	2	2		2		2	2
Two	Senior Operator			2		3		3
	Operator			3		4		4

¹ For the purpose of this table, a nuclear power unit is considered to be operating when it is connected to the grid.



Part 26 Subpart I Implementation

Applicability

10 CFR 26.4 (a) and (b) both state that the FFD program is applicable to all persons who are granted unescorted access to the protected areas.



Part 26 Subpart I Implementation

Training

§26.29 (b) states: The examination must include a comprehensive random sampling of all KAs including at least one question from each KA.



Your Questions