APPENDIX A

CHECKLIST FOR PROCEDURES

AllWritten procedures should cover all activities listed below are to be covered by written procedures. The list is not intended to be all-inclusive or to imply that procedures must be developed with the same titles as those on the list. This listing is divided into four categories and provides guidance on topics to be covered.

1.   Management Control Procedures

        Training
        Audits and assessments
        Incident investigation
        Records management
        Configuration management
        Quality assurance
        Equipment control (lockout/tagout)
        Shift turnover
        Work control
        Procedure management
        Nuclear criticality safety
        Fire protection
        Radiation protection
        Radioactive waste management
        Maintenance
        Environmental protection
        Chemical process safety
        Operations
        Calibration control
        Preventive maintenance

2.   Operating Procedures

        a.   System Procedures That Address Startup, Operation, Shutdown, Control of
                Process Operations, and Recovery Afterafter a Process Upset

                Ventilation
                Criticality alarms
                Shift routines, shift turnover, and operating practices
                Decontamination operations
                Uranium recovery
                Facility utilities (air, other gases, cooling water, fire water, steam)
                Temporary changes in operating procedures

        b.   Abnormal Operation/Alarm Response

Loss of cooling water
Loss of instrument air
Loss of electrical power
Loss of criticality alarm system

Fires
Chemical process releases

3.   Maintenance Activities That Address System Repair, Calibration, Surveillance, and and Functional Testing

Repairs and preventive repairs of items relied on for safety (IROFS)
Testing of criticality alarm units
Calibration of IROFS
High Efficiency efficiency particulate air (HEPA) filter maintenance
Functional testing of IROFS
Relief valve replacement/testing
Surveillance/monitoring
Pressure vessel testing
Nonfired pressure vessel testing
Piping integrity testing
Containment device testing

4.   Emergency Procedures

Response to a criticality
Hazardous process chemical releases (including uranium hexafluoride)

APPENDIX B

INCIDENT INVESTIGATIONS PROGRAMS AND PROCEDURES

The following are good practices to incorporate in incident investigations programs and/or procedures:

(1)   The investigation of an abnormal event should begin as soon as possible after the event has been brought under control.

(2)   The incident investigation program contains a documented procedure for investigating an abnormal event. This procedure is separate from any required emergency plan.

(3)   The program contains a description of the functions, qualifications, and responsibilities of the manager who would lead the investigative team and those of the other team members; the scope of the team's authority and responsibilities; and an assurance of the cooperation of management.

(4)   Qualified internal or external investigators are appointed to serve on investigating teams when required. The teams should include at least one process expert and at least one team member trained in root cause analysis.

(5)   The program contains guidance for personnel conducting the investigation on how to apply a reasonable, systematic, structured approach to determine the specific or generic root cause(s) and generic implications of the problem. The level of investigation should be based on a graded approach relative to the severity of the incident.

(6)   The incident investigation team is given assurance of the team's authority to obtain all the information considered necessary and is independent from the functional area involved in the incident under investigation.

(7)   The investigation process and investigating teams are independent of the line management.

(8)   Auditable records and documentation related to abnormal events, investigations, and root cause analysis are maintained. For each abnormal event, the incident report should include a description, contributing factors, a root cause analysis, and findings and recommendations. Relevant findings are reviewed with all affected personnel.

APPENDIX BC

RECORDS

The requirements for records management vary according to the nature of the facility and the hazards and risks posed by it poses. Examples of the records required by Title 10 CFR, Parts Parts 19, 20, 21, 25, and 70, of the *Code of Federal Regulations* are listed below. The records are listed under the chapter headings of the Standard Review Plan (SRP). The list is not intended to be exhaustive or prescriptive. Different or additional records might may be required in certain circumstances. Further, the applicant may choose to organize the records in other ways.

Examples of Records

SRP Chapter

1 General Information

————Construction records

————Facility and equipment descriptions and drawings

————Design criteria, requirements, and bases for items relied on for safety (IROFS) as specified by the facility configuration management (CM) function

————Records of facility changes and associated integrated safety analyses, as specified by the facility CM function

————Safety analyses, reports, and assessments

————Records of site characterization measurements and data

————Records pertaining to onsite disposal of radioactive or mixed wastes in surface landfills

————Procurement records, including specifications for IROFS

2 Organization and Administration

————Administrative procedures with safety implications

————Change control records for material control and accounting program

————Organization charts, position descriptions, and qualification records

————Safety and health compliance records, medical records, personnel exposure records, etc.

~~QA~~Quality assurance records

Safety inspections, audits, assessments, and investigations

Safety statistics and trends

3 Integrated Safety Analysis

4 Radiation Safety

Bioassay data

Exposure records

Radiation protection (and contamination control) records

Radiation training records

Radiation work permits

5 Nuclear Criticality Safety

Nuclear criticality control written procedures and statistics

Nuclear criticality safety analyses

Records pertaining to nuclear criticality inspections, audits, investigations, ~~and~~ and assessments

Records pertaining to nuclear criticality incidents, unusual occurrences, or accidents

Records pertaining to nuclear criticality safety analyses

6 Chemical Safety

Chemical process safety procedures and plans

Records pertaining to chemical process inspections, audits, investigations, ~~and~~ and assessments

Diagrams, charts, and drawings

Records pertaining to chemical process incidents, unusual occurrences, or accidents

Chemical process safety reports and analyses

———Chemical process safety training

7 – Fire Safety

———Fire Hazard AnalysisFire hazard analysis

———Fire prevention measures, including hot-work permits and fire watch records

———Records pertaining to inspection, maintenance, and testing of fire protection equipment

———Records pertaining to fire protection training and retraining of response teams

———Pre-fire emergency plans

8 – Emergency Management

———Emergency plan(s) and procedures

———Comments on emergency plan from outside emergency response organizations

———Emergency drill records

———Memoranda of understanding with outside emergency response organizations

———Records of actual events

———Records pertaining to the training and retraining of personnel involved in emergency preparedness functions

———Records pertaining to the inspection and maintenance of emergency response equipment and supplies

9— Environmental Protection

———Environmental release and monitoring records

———Environmental report and supplements to the environmental report, as applicable

10 - Decommissioning

———Decommissioning records

———Financial assurance documents

———Decommissioning cost estimates

———Site characterization data

———

*** Note: This is a proposed revision to Appendix 11 of NUREG1520 ***

Final survey data

Decommissioning procedures

11   Management Measures

11.1   Configuration Management

- •   Safety analyses, reports, and assessments that support the physical configuration of process designs, and changes to those designs

- •   Validation records for computer software used for safety analysis or material control and accounting

- •   Integrated Safety Analysis (ISA)safety analysis documents, including process descriptions, plant drawings and specifications, and purchase specifications for IROFS

- •   Approved, current operating procedures and emergency operating procedures

11.2   Maintenance

- •   Record of IROFS failures (required by 10 CFR 70.62)
- PM•   Preventive Maintenance records, including trending and root cause analysis
- •   Calibration and testing data for IROFS
- •   Corrective maintenance records

11.3   Training and Qualification

- •   Personnel training and qualification records
- •   Procedures

- 11.4•   Procedures

11.4   Procedures

- •   Standard operating procedures
- •   Functional test procedures

11.5   Audits and Assessments

- •   Audits and assessments of safety and environmental activities

11.6   Incident Investigations

- •   Investigation reports

- • Changes recommended by investigation reports, how and when implemented
- • Summary of reportable events for the term of the license
- • Incident investigation policy

11.7 Records Management

- • Policy
- • Material storage records
- • Records of receipt, transfer, and disposal of radioactive material

11. 8 Other Quality Assurance Elements

- Inspection records
- Test records
- Corrective action records

*** Note: This is a proposed revision to Appendix 11 of NUREG1520 ***

APPENDIX A

FILING STANDARDS FOR SUBMITTALS

The requirements of 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material," specify that applications for a license to possess and use special nuclear material should be filed in accordance with the general information in Sections 70.5, "Communications" and 70.21, "Filing." This appendix has been prepared to provide more specific guidance for staff reviewers regarding the acceptable and preferred format for license and amendment applications.

Use of a standard submittal format for new and renewal applications facilitates a uniform and clear presentation by fuel cycle facility applicants. Such clarity and uniformity will facilitate a timely and uniform review by the NRC staff, and a clear and cogent presentation for understanding by parties other than the NRC and applicant who may have a legitimate interest in the application. Information contained in previous submittals, statements, or reports filed with the NRC with respect to an existing license may be incorporated by reference provided such references are clear and specific. The information called for in this SRP that is incorporated by reference to a previous application should be summarized.

Proprietary Information

Proprietary information should be submitted separately. When submitted, it should be clearly identified and accompanied by the applicant's justifications for requesting its being withheld from public disclosure, as specified by § 2.790, "Public Inspections, Exemptions, Requests for Withholding," of 10 CFR Part 2, "Rules of Practice for Domestic Licensing Proceedings." The NRC staff's review of the safety analysis should depend as much as possible on nonproprietary information to ensure that the public is properly apprized of the reasons for and effects of licensing actions.

Classified Information

Classified information should be submitted separately. When submitted, it should be clearly identified and accompanied by the applicant's justifications for requesting its being withheld from public disclosure, as specified by applicable classification regulations. The NRC staff's review of the safety analysis should depend as much as possible on unclassified information to ensure that the public is properly apprized of the reasons for and effects of licensing actions.

Style and Composition

Applications should clearly and concisely present the information to demonstrate compliance with NRC requirements.

Where numerical values are stated, the number of significant figures given should reflect the accuracy or precision to which the number is known. Where appropriate, estimated limits of errors or uncertainty should be given.

Abbreviations should be consistent throughout the application and should be consistent with generally accepted usage. Any abbreviations, symbols, or special terms not in general usage or

unique to the facility should be defined when they first appear in the application or should be presented in a separate glossary of terms and definitions.

Text pages should be single spaced, with a type face and style suitable for microfilming or reproduction by image-copying equipment.

Pages should be numbered with the digits corresponding to the chapter followed by a hyphen and a sequential number, e.g., the third page of Chapter 4 should be number 4-3. Sequential numbers for the entire report should not be used.

A table of contents should be included in each volume of the renewal application.

Graphical Presentations

Graphical presentations such as drawings, maps, diagrams, sketches, and tables should be employed where the information may be presented more adequately or conveniently by such means. All information so presented should be legible, symbols should be clearly defined, and scales large enough that visual aids are not necessary to interpret pertinent items of information. These graphical presentations should be located in the section where they are primarily referenced.

Physical Specifications

Paper size:

Text pages should be 8 ½ × 11 inches; drawings and graphics should also be 8 ½ × 11 inches; however, a larger size is acceptable provided the finished copy when folded does not exceed 8 ½ × 11 inches.

Paper stock and ink:

The paper stock should be of suitable quality and color, and the ink of suitable density for handling and reproduction by microfilming or image-copying equipment.

Page margins:

A margin of no less than 1 inch should be maintained on the top, bottom, and binding side of all pages submitted.

Printing:

The material may be mechanically or photographically reproduced. All pages of text should be printed on both sides and the image printed head to head. Pages should be punched and mounted in three-hole ring binders.

Submittal to NRC

In addition to paper copies of the applications submitted in accordance with 10 CFR 70.5 and 70.21, submittals to NRC should include a reproducible copy in electronic media in Corel

WordPerfect version 8.0 or other word processing format that converts accurately to the Corel WordPerfect format.

Procedures for Updating or Revising Pages

Data and text should be updated or revised by replacing pages. The changed or revised portion on each page should be highlighted by a "change indicator" mark consisting of a bold vertical line drawn in the margin opposite the binding margin. The line should be of the same length as the portion actually changed. All pages submitted to update, revise, or add pages to the report should show the date of change and a revision or amendment number. A guide page listing the pages to be inserted and the pages to be removed should accompany the revised pages. Where major changes or additions are made, a revised table of contents should be provided.

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