2504-01 PURPOSE

01.01 To specify the inspection policies for reviewing the programs supporting construction and operational readiness of a plant licensed in accordance with 10 CFR Part 52 that are not directly related to Inspections, Tests, Analyses and Acceptance Criteria (ITAAC).

01.02 To furnish the inspection policies to assess whether a licensee conforms to and correctly implements the initial test program contained in the Final Safety Analysis Report (FSAR) for pre-operational testing.

01.03 To provide guidance for a plant licensed under 10 CFR Part 52 in transitioning from construction inspection to oversight under the Reactor Oversight Program (ROP) for power operations.

2504-02 OBJECTIVES

02.01 To assess whether the licensee has a construction program that addresses radiation protection during construction, quality assurance (QA), reporting of defects and failures to comply under 10 CFR 50.55(e), commercial-grade dedication, fitness for duty, and a process for completion and closure of ITAAC.

02.02 To assess whether management controls and procedures, including quality assurance and problem identification and resolution programs, necessary for construction and operation of the facility have been documented and effectively implemented.

02.03 To determine the adequacy of the pre-operational testing portion of the initial test program conducted by the licensee for structures, systems and components.

02.04 To determine the operational readiness of a plant licensed in accordance with 10 CFR Part 52.

02.05 To provide an objective basis, for a plant licensed under 10 CFR Part 52, to transition to monitoring by the ROP.

2504-03 APPLICABILITY

This phase of the construction inspection program will become effective upon issuance of a combined license (COL) or Limited Work Authorization (LWA). The construction inspection program will remain applicable until the Commission issues a Finding, in accordance with 10 CFR 52.103(g), that the COL acceptance criteria have been met, enabling transition of the new facility to oversight under the ROP.

The CIP includes those inspection activities directed toward assessing a licensee's construction, and operational programs (to include pre-operational testing). Start-up Testing activities will be assessed under Inspection Manual Chapter 2514 "Light Water Reactor Inspection Program - Start-up Testing Phase." This manual chapter is not applicable to operational programs that are addressed by ITAAC. This manual chapter will be performed in parallel with, but independent of, IMC 2503, "Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work." All inspections for ITAAC-related activities will be performed under IMC 2503.

A verification of the implementation of the operational programs submitted for review in the COL application will be performed prior to the authorization to load fuel or the initiation of low-power testing to assess the licensee's operational readiness.

The general requirements identified in this IMC are applicable to all COL designs. However, the detailed inspection procedures to be implemented may differ, depending upon the type of plant design contained in the COL.

2504-04 DEFINITIONS

Applicable definitions are found in Inspection Manual Chapter 0613-03 "Documenting 10 CFR Part 52 Construction and Test Inspections."

2504-05 RESPONSIBILITIES AND AUTHORITIES

- 05.01 Director, Office of New Reactors (NRO).
 - a. Concurs with Regional Administrator assessment of plant readiness to transition to ROP.
 - b. Informs the Commission on the operational readiness of the plant and implementation status of the operational programs to support loading of fuel.

05.02 Regional Administrator, Region II.

- a. Provides overall direction for the implementation of the construction inspection program for all new construction sites.
- b. Informs the Director, NRO, when the inspection staff has completed inspections of required operational programs.
- c. Provides an assessment of the overall operational readiness to load fuel to the Director, NRO.
- d. Makes the decision to allow a plant to transition completely to the full oversight of the ROP with the concurrence of the Director, Division of Inspection and Regional Support (DIRS), Office of Nuclear Reactor Regulation (NRR), Director, Division of Construction Inspection and Operational Programs (DCIP), NRO, and the home regional administrator for ROP oversight.

05.03 Construction Inspection Staff, Region II.

- a. Implements the construction inspection program at the facility and at remote locations.
- b. Coordinates development and review of the site specific inspection plan and schedule (IP&S).
- c. Ensures that inspections are promptly and properly documented.

- d. Periodically assesses inspection findings in accordance with IMC 2505, "Periodic Assessment of Construction Inspection Program Results."
- e. Assesses inspection records and licensee corrective actions to determine the operational readiness of the new plant.
- f. Conducts inspections to determine the readiness of a plant to transition to the ROP.
- g. Provides post-startup oversight until all startup issues are closed.
- 05.04 <u>Director</u>, <u>Division of Construction Inspection and Operational Programs</u> (NRO/DCIP).
 - a. Provides overall program direction for the construction inspection program.
 - b. Develops and directs the implementation of policies, programs, and procedures for inspecting the licensee within or in addition to the construction inspection program.
 - c. Concurs with the decision of the Regional Administrator(s) to allow a new plant to transition from Construction Inspection into the ROP.

2504-06 BACKGROUND AND OVERVIEW

This manual chapter establishes policy for the construction inspection program for the following:

- Licensee's Construction Programs
- Pre-operational Testing
- Operational Programs (Without ITAAC)
- Transition to the ROP

Inspections associated with ITAAC will be conducted in accordance with IMC 2503.

The NRC will evaluate the implementation of the licensee's construction programs to ensure that programs meet regulatory requirements as well as the licensee's QA program and construction program commitments (See Appendix A). The evaluation of operational programs during the COL application review process will ensure that the scope of the operational programs are appropriate and consistent with regulations and the site-specific Final Safety Analysis Report (FSAR). Any inspection required to support that review will be conducted in accordance with IMC 2502, Construction Inspection Program: Pre-Combined License (Pre-COL) Phase. Operational programs that do not have ITAAC will be listed in Chapter 13 of the FSAR and will be fully described in the COL application. Any operational program without implementation requirements in the regulations will be subject to a license condition which will require the licensee to provide implementation milestones and to maintain an updated implementation schedule.

Inspections will be performed under this manual chapter to assess the licensee's development and implementation of its operational programs. The majority of

operational programs, listed in Appendix B, will be established prior to initial fuel loading.

In parallel with the determination on ITAAC inspections, Region II and the host regions will determine if operational programs listed in Appendix B of this manual chapter are properly established and that the appropriate amount of pre-operational testing has been completed. The Commission will be informed on the operational readiness of the plant and implementation status of the operational programs. An Operational Readiness Assessment Team (ORAT) inspection will be the mechanism for communicating status and readiness of a licensee's operational programs to the Commission.

The construction inspection staff will ensure that the operational programs are properly established and that the pre-operational testing and all required corrective actions have been completed prior to fuel load.

The decision to allow a plant to fully transition into the ROP and to fully implement the ROP assessment process (all cornerstones of safety able to be monitored) will be made by the Regional Administrator Region II with the concurrence of the Director, DIRS/NRR based on the recommendation of the inspection staff, Director DCIP/NRO, and the Regional Administrator for ROP oversight.

- 2504-07 GENERAL INSPECTION POLICY
- 07.01 Inspection Program Scheduling and Planning.
 - a. This manual chapter contains the inspection procedures that may be implemented by the site-specific inspection plan and schedule (IP&S) developed by the construction inspection staff. The IP&S should be detailed but flexible and optimize the number of inspections (group various issues and programs together).
 - b. The construction inspection staff should ensure that the IP&S differentiates between the inspections performed before fuel load and those performed after fuel load.
 - c. The construction inspection staff must be aware of the status of construction and testing activities in order to achieve appropriate inspection planning and to update the IP&S which will coordinate NRC inspection activities with licensee construction and startup activities.
 - d. The construction inspection staff establishes the appropriate inspection effort in the IP&S. The inspection procedures listed in this manual may not need to be implemented entirely in order to meet specific inspection requirements.
- 07.02 Construction Inspection Policy and Scope.
 - a. The construction inspection staff will implement the construction inspection program, including QA, operational programs, pre-operational testing, and the operational readiness of the plant.
 - b. The construction inspection staff will review the construction activities and programs listed in this manual chapter. The construction inspection staff will

use sampling inspections and will identify the sample size for each inspection procedure and the number of times to implement each inspection procedure. This will establish the overall scope of the portion of the construction inspection program governed by this manual chapter.

- c. The respective NRO licensing project manager, in conjunction with the construction inspection staff, will coordinate NRO licensing activities and any needed technical support from the regional inspection staff.
- d. The construction inspection staff will periodically assess previous inspection findings to determine if the current level of inspection effort should remain at the baseline level, or be increased in accordance with IMC 2505, "Periodic Assessment of Construction Inspection Program Results."
- e. Completion of construction inspection requirements relative to the observation of work activities and the review of quality records is required for each unit of the plant under construction.
- f. The policies and guidance set forth in this manual chapter will be applicable regardless of the work location, whether onsite or offsite at remote fabrication facilities. This is also true whether the organization performing the work is the licensee or a contractor for the licensee.

2504-08 DISCUSSION

This chapter provides guidance for implementing the non-ITAAC portion of the construction inspection program. It establishes uniform inspection methodology, but leaves sufficient latitude for the construction inspection staff to optimize the use of inspection resources. This chapter defines the inspection program for the evaluation of the licensee's construction programs, including QA, ITAAC closure, and FFD; operational programs prior to fuel load; and pre-operational testing.

08.01 <u>Construction Programs</u>. The inspection of the licensee's construction program will focus on its programmatic elements. These include the radiation protection program for construction, construction QA, the program for reporting defects under 10 CFR 50.55(e), commercial-grade dedication programs, the process used to submit an ITAAC determination to the NRC for verification of its successful completion, and Fitness for Duty (FFD). Additionally, the handling of allegations related to plant construction and the readiness for operations will be included in the review of the licensee's construction programs. The inspection procedures for reviewing the licensee's construction programs are provided in Appendix A.

a. Construction QA Program - Sound construction and testing controls are assured by the licensee establishing and implementing a construction QA program that focuses on the timely identification of problems with construction activities; by the inspection and surveillance of construction, test, and operational programs; and by the early recognition of QA program deficiencies and adverse trends. As a result, the NRC will continually validate that the licensee's QA program is operating as intended and that the appropriate corrective measures for identified problems are achieved by the successful implementation of the licensee's problem identification and resolution (PI&R) program. The NRC will observe the implementation of the construction QA program during the performance of most NRC inspections. The review of the licensee construction QA program will also include the review of the QA programs of contractors, whether work is performed onsite or at remote locations. This will allow the construction inspection staff to become aware of any QA program deficiencies that are relevant and that must be corrected before the NRC can determine that an ITAAC work-related activity or an operational program is acceptable.

The NRC programmatic review and acceptance of the licensee's QA audits and surveillance activities, which verify the administration and implementation of work-related, operational, and test programs, will be integral to the NRC's assessments of the acceptability of those programs. However, once NRC programmatic reviews of the licensee's QA program have been completed, further NRC inspections will be necessary to confirm acceptable construction activities and will verify the licensee's implementation of effective QA controls over construction activities.

For multi-unit facilities, the review of the QA procedures may be reduced for subsequent units when no substantive changes have been made to those procedures. However, it should be noted that revisions to QA procedures that may have a significant adverse effect on quality should be examined for all units. Therefore, sufficient inspection is required to ascertain the adequacy of procedures common to each unit.

- b. Program for Reporting Defects and Failure to Comply Per 10 CFR 50.55(e) -The NRC will examine licensee procedures for evaluating and reporting deviations and failure to comply, to determine that those are in accordance with 10 CFR 50.55(e). The NRC places emphasis on the reporting of defects and failures to comply because of the potential to create a substantial safety hazard, as defined in 10 CFR 50.2. A licensee's program for compliance with 10 CFR 50.55(e) should be rigorous and responsive.
- c. Inspection of Commercial-Grade Dedication Program The NRC will examine licensee procedures to verify that its commercial-grade dedication program satisfies the requirements of Appendix B to 10 CFR Part 50 (Appendix B) with regard to the procurement and acceptance of commercial-grade items for use as basic components in accordance with 10 CFR Part 21.
- d. Radiation Protection during Construction The NRC will evaluate licensee processes that address radiography, radiation protection program during construction, and construction impact on 10 CFR 20.1406 programs.
- e. ITAAC Closure Program The NRC will verify the adequacy of the licensee's program for developing ITAAC closure determination submittals. This inspection will evaluate the process so that the NRC can have confidence in the accuracy and completeness of the information submitted by the licensee. Knowledge of a licensee's program for controlling ITAAC determination submittals will be factored into the level of review performed by the NRC on individual ITAAC determinations submitted by the licensee.
- f. Fitness for Duty Program The NRC will assess and evaluate licensee processes and implementation of Fitness for Duty for Construction in accordance with 10 CFR Part 26, Subpart K.

- g. Construction Testing A licensee shall have a construction testing program to demonstrate that components and systems are correctly constructed, installed, and operational; and to assure that those components and systems are ready for pre-operational testing. The NRC will review test procedures, witness some tests, and independently review the results of tests (on a sampling basis) in order to confirm adequate implementation of the construction testing program.
- Pre-Operational Testing Regulatory Guide 1.68, Initial Test Programs for h. Water-Cooled Nuclear Power Plants, describes the general scope and depth that the NRC staff considers acceptable for ITPs for light-water-cooled nuclear power plants. The ITP consists of pre-operational and initial startup tests. "Preoperational testing" consists of those tests conducted following completion of construction and construction-related inspections and tests, but prior to fuel loading, to demonstrate, to the extent practical, the capability of SSCs to meet the performance requirements to satisfy the design criteria. "Initial startup testing" consists of those test activities that are scheduled to be performed during and following fuel loading. These activities include fuel loading, precritical tests, initial criticality, low-power tests, and power-ascension tests. Preoperational testing will be inspected under IMC 2504 and initial startup testing will be inspected under IMC 2514.
 - 1. Goals of Pre-Operational Testing are:
 - (a) Verify that Structures, Systems and Components (SSCs) meet appropriate performance criteria based on the design.
 - (b) Document the performance and condition of SSCs.
 - (c) Collect baseline test and operating data on SSCs
 - (d) Verify equipment and component performance
 - (e) Verify that plant systems can operate in an integrated manner.
 - 2. A graded approach toward the inspection of pre-operational testing is beneficial because of the varying safety impact of SSCs. Portions of some pre-operational tests may be covered by an ITAAC. Those tests may be referenced in and monitored by both IMC 2503 and this manual chapter. The inspection program for pre-operational testing defines the minimum inspection requirements for determining the state of readiness of the licensee to perform low-power testing and to operate the facility at full reactor power levels.
 - 3. Inspection Program for Pre-Operational Testing Appendix A lists the general inspection procedures to be used for evaluating the licensee's pre-operational test program. Design-specific inspection procedures will also be used to verify that a sample of important-to-safety systems and components are tested fully and meet their design requirements. The schedule for pre-operational testing inspections will be in accordance with the construction inspection staff's IP&S.

08.02 <u>Operational Programs</u>. The approach to inspection of operational programs reflects the staff positions detailed in SECY-05-197, "Review of Operational Programs in a Combined License and General Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria."

- a. A listing of Operational Programs is provided in Appendix B.
- b. Implementation of Operational Programs Licensees must implement the operational programs necessary to support each milestone of plant preparation for operation before the program is required by regulations or by a license condition in the COL. Some operational programs may have ITAAC based on the COL application and will be covered by IMC 2503. Emphasis is placed on the QA program because of its interaction and impact on all other operational programs.
- c. Inspection of Operational Programs Using the inspection procedures in Appendix B, the NRC will assess each program's development and effectiveness of implementation as each program is activated. Similar aspects among the various operational programs may allow the construction inspection staff to adjust the level of inspection of some operational programs based on the inspection results for programs already reviewed. This would be especially true for those aspects of programs which are similar to one another such as management involvement or corrective action.

Site-wide operational programs, such as security, can not be effectively evaluated for just the new unit independent of the existing units at a site. Therefore, the evaluations of these operational programs will consist of reviewing the implementation of the programs and those aspects which are different from the existing operational programs.

d. Evaluation of the QA Program for Operations - Implementation of the licensee's QA program for operations is important since the safe operation of the plant is predicated on the identification of problems by the licensee's QA program and timely correction of problems through the licensee's PI& R program. The NRC will verify that the licensee's QA program for operations is established prior to fuel load. The NRC may observe QA activities for some construction activities to verify the implementation of activities common to both the construction and operations QA programs. Any QA program deficiencies that are relevant to QA for operations can then be resolved before the NRC makes a determination about the QA program for operations.

The NRC's inspection of the construction QA program will verify the effectiveness of the licensee's QA audit function, which will be considered when assessing the QA program for operations.

- e. Characterization of Operational Programs The staff will inform the Commission of the status of these programs before the Commission makes the determination that the licensee can load fuel. The staff will report to the Commission based on the following:
 - 1. The organizational structure is established sufficient to support implementation of the operational programs.
 - 2. The implementation of operational programs is consistent with regulations, licensee commitments, license conditions, or standard practices.
 - 3. The adequacy of the licensee's procedures for the programs.
 - 4. The licensee's effective administration and control of the operational program in meeting objectives and policies.
 - 5. Management involvement with the development, revision, implementation, and enforcement of the operational programs.

f. <u>Operational Readiness Assessment Team Inspections</u>. The Operational Readiness Assessment Team (ORAT) inspection will be conducted based on licensee implementation of operational programs. The focus of these inspections is on readiness to support plant operations. Results from this inspection will provide a major input and basis for an NRC determination of startup readiness. Additionally, ORAT results may be used to inform the Commission of the status of operational programs, a commitment made by the Staff in SECY-06-114 "Description of the Construction Inspection Program for Plants Licensed under 10 CFR Part 52." The inspection schedule and scope of these inspections is to be tailored to the individual plant circumstances. Regional management may decide to use a phased approach to this inspection based on the licensee's implementation schedule.

2504-09 TRANSITION TO ROP INSPECTION ACTIVITIES

09.01 <u>Transition Milestone</u>. A major focus of the construction inspection program, implemented in accordance with IMC 2503, is on licensee work being performed in support of ITAAC closure. Completion of ITAAC supports the Commission in making the finding, required by 10 CFR 52.103(g), on whether the acceptance criteria in the COL have been met. The 52.103(g) finding represents the transition point (milestone) where the construction inspection program will end and the Reactor Oversight Process will be implemented.

09.02 Plant Transition to the ROP.

- a. When the Commission issues the 52.103(g) finding, the assessment of the facility will transition from the construction assessment process described in IMC 2505 to the Operating Reactor Assessment Program described in IMC 0305
- b. Inspections of operational programs pursuant to this Manual Chapter prior to the 103(g) finding will be conducted by Region II inspectors or the host region and will be considered part of the construction inspection program. It is recognized that some operational programs may not be fully implemented at the time of the 52.103(g) finding. These programs will be inspected at the first available opportunity subsequent to the 103(g) finding. Operational programs that require additional inspection after the 52.103(g) finding will be identified during the turnover from construction inspection to the host region. Completion of these inspections will be the responsibility of the host region, and will be accomplished under the guidance of IMC 2514.
 - c. The transfer of the new plant to the full oversight of ROP will require the written approval of the Regional Administrator Region II, with the concurrence of the Director, DIRS/NRR, Director DCIP/NRO and the Regional Administrator for ROP oversight. This transfer may occur even if all ROP PIs are not yet available, provided that compensatory inspections are conducted, as necessary, in accordance with IMC 2515, "Light Water Reactor Inspection Program Procedures" or equivalent for other technologies.

2504-10 INSPECTION FINDINGS AND ENFORCEMENT

Construction inspection observations of the licensee's construction programs, operational programs, pre-operational testing portion of the initial test program, operational readiness, and the transition to the ROP will be assessed and documented using the criteria in IMC 0613 "Construction Inspection Reports."

The NRC will inform the licensee of all inspection findings whether identified for onsite construction activities or for offsite fabrication activities. The NRC will verify that the licensee adequately corrects all deficiencies identified.

Enforcement actions will be in accordance with IMC 2505, IMC 0613, and the Commission's Enforcement Policy related to construction.

The NRC will address programmatic findings commensurate with their impact on the successful completion of ITAAC, the quality of plant construction and testing, and operational readiness.

END

Appendix A, Inspection of Construction Programs Appendix B, Inspection of Operational Programs

APPENDIX A

INSPECTION OF CONSTRUCTION PROGRAMS

This Appendix lists the Inspection Procedures (IPs) to be used when reviewing the licensee construction programs, as outlined in Section 08.01.

The purpose of these inspections is to verify that the licensee has programs established and implemented to:

- 1. Control construction activities at the site
- 2. Identify problems and resolve them
- 3. Report deficiencies and identify failures to do so
- 4. Ensure design requirements are translated to construction documentation
- 5. Ensure the adequacy of ITAAC determination packages for submittal to the NRC.

This Appendix is applicable to all types of advanced reactor designs. The listing of IPs in this Appendix may not be all inclusive and changes may be required to the listing at a later date.

CONSTRUCTION PROGRAM INSPECTION			
Program	Requirement	IP No.	IP Title
Radiation Protection during Construction	10 CFR 20, Subpart B	83311	Radiation Protection during Construction
Quality Assurance (QA) - Construction	50.54(a) 50.55(f)	35007	Quality Assurance Program Implementation during Construction
Reporting Defects and Noncompliance (Construction)	50.55(e)(3)	36100	Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance
Commercial Grade Dedication	Part 21	43004	Inspection of Commercial Grade Dedication Programs
	'		

CONSTRUCTION PROGRAM INSPECTION			
ITAAC Management	52.99	40600	Reserved for Licensee Program for ITAAC Management
Reporting Defects and Noncompliance (Construction)	50.55(e)(3)	36100	Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance
Fitness for Duty	Part 26, Subpart K	81xxx	Fitness for Duty Program for Construction
Pre-operational Test Program	50.34 52.79(a)(28)	70367	Reserved for Part 52 Pre-operational Test Program Implementation



APPENDIX B

INSPECTION OF OPERATIONAL PROGRAMS

This Appendix lists the Inspection Procedures (IPs) to be conducted to verify operational programs, as outlined in Section 08.02.

The purpose of these inspections is to verify that operational programs required for lowpower testing have been established and are being implemented, to the degree required, in accordance with the COL license conditions related to operational programs.

This Appendix is applicable to all types of advanced reactor designs. The listing of IPs in this Appendix may not be all inclusive and changes may be required to the listing at a later date.

Program	Requirement	IP No.	IP Title
		73054	Part 52, Preservice and Inservice Inspection - Review of Program
Inservice Inspection	50.55a(g)	73754	Reserved for Part 52 Inservice Inspection - Observation of Work and Work Activities
		73757	Part 52 Inservice Inspection - Data Review and Evaluation
Inservice Testing	50.55a(f)	73756	Inservice Testing of Pumps and Valves
Environmental Qualification	50.49	51080	Reserved for Environmental Qualification
		73054	Part 52, Preservice and Inservice Inspection – Review of Program
Preservice Inspection	50.55 8 (g)	73055	Pre-service Inspection Data Review and Evaluation
Reactor Vessel Material Surveillance	50.60, App. H	50054	Reactor Vessel Material Surveillance Program

OPERATIONAL PROGRAM INSPECTIONS

Program	Requirement	IP No.	IP Title
Preservice Testing	50.55a(f)	TBD	TBD
Containment Leak Rate Testing	50.54(o)	70368	IP 70307 Containment Integrated Leak Rate Test Procedure Review New IP 70368 Reserved for Part 52 Containment Leak Rate Testing (Programmatic) New IP 70369 Reserved for Part 52 Containment Leak Rate Testing
Fire Protection	50.48	64705	Part 52, Fire Protection Operational Program
		84527	Part 52, Solid Waste Management
		84528	Reserved for Part 52 Liquid Waste Management System
Process and Effluent	50.34(b)(3),	84529	Reserved for Part 52, Gaseous Waste Management System
Monitoring Part 50 App. I		80522	Part 52 Radiological Environmental Monitoring Program (REMP)
		83746	Part 52, Offsite Dose Calculation Manual (ODCM)
		80522	Part 52, Radiological Environmental Monitoring Program (REMP)
		83533	Part 52, External Occupational Exposure Control and Personal Dosimetry
Radiation Protection	10 CFR 20.	83534	Part 52, Internal Exposure Control
Subpart B	Subpart B	83535	Part 52, Control of Radioactive Materials and Contamination, Surveys, and Monitoring
		83536	Part 52, Facilities and Equipment
		83537	Part 52, Maintaining Occupational Exposures ALARA

		83746	Part 52, Offsite Dose Calculation Manual
Program	Requirement	IP No.	IP Title
		36302	Operational Staffing
Non licensed Plant Staff	50.120	42401	Reserved for Part 52, Plant Procedures
Training Program	52.78	42543	Part 52, Operating Procedures Inspection
		42454	Part 52, Emergency Procedures
	55.13, 55.31, 55.41, 55.43, 55.45	36302	Operational Staffing
		42401	Reserved for Part 52, Plant Procedures
Reactor Operator Training		42453	Part 52, Operating Procedures Inspection
		42454	Part 52, Emergency Procedures
		TBD	New IP – Operations Simulator Inspection
Paactor Operator	50.34(b)	71111.11	Licensed Operator Requalification
Requalification	50.54(i) 55.59	TBD	New IP – Operations Simulator Inspection
Emergency Preparedness	50.34(b)(6)(v), 50.47, 50.54(q), 50.54(t)	TBD	TBD
Security (including training, vehicle and personnel access control, FFD and safeguards contingencies)	50.34(c) 50.34(d) 50.34(e) 50.54(p)(1) 50.45(v)	TBD	TBD
			OA Program Implementation
	50.54(a)	35101	Inspection for Operational Programs Part 52 - Procurement Control &
Quality Assurance		35752	Receipt, Storage and Handling of Equipment and Materials
(Operation)		36100	Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance
		43004	Inspection of Commercial-Grade Dedication Programs

Program	Requirement	IP No.	IP Title
Maintenance Rule	50.65	62706	Maintenance Rule
Motor-Operated Valves	50.55a(b)(3)(ii)	TBD	TBD
Initial Test Program	50.34 52.79(a)(28)	70367	Reserved for Part 52 Pre-operational Test Program Implementation
		93806	Operational Readiness Assessment Team Inspections
Operational Readiness	SECY-06-0114	93813	Reserved for Part 52 Operational Readiness Assessment Team Inspection

