

# **NRC INSPECTION MANUAL**

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## **MANUAL CHAPTER 2504**

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**CONSTRUCTION INSPECTION PROGRAM -  
INSPECTION OF CONSTRUCTION AND OPERATIONAL PROGRAMS**

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## 2504-01 PURPOSE

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

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

01.03 To specify the inspection policies for reviewing, prior to the Commission's 10 CFR 52.103(g) finding, the operational programs described in the FSAR, for a plant licensed in accordance with 10 CFR Part 52.

## 2504-02 OBJECTIVES

02.01 To assess whether the licensee has a construction program that addresses quality assurance (QA), reporting of defects and failures to comply in accordance with 10 CFR Parts 21 and 50.55(e), commercial-grade dedication, security (including fitness for duty (FFD)), and a process for completion and closure of ITAAC.

02.02 To assess whether management controls and procedures, including QA and corrective action programs, necessary for construction and operation of the facility have been effectively implemented.

02.03 To determine the adequacy of the pre-operational testing portion of the initial test program conducted by the licensee.

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

## 2504-03 APPLICABILITY

This phase of the construction inspection program (CIP) will become effective upon issuance of a combined license (COL), or Limited Work Authorization (LWA). The CIP 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.

The CIP includes those inspection activities directed toward assessing a licensee's construction (including pre-operational testing) and operational programs. 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, "Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work." All inspections directly related to ITAAC activities will be performed under IMC 2503. IMC 2504 inspections will involve the inspection of QA activities affecting systems, structures, and components (SSCs) that are installed in the

plant, thereby having the potential to impact ITAAC. Therefore, ITAAC will be “indirectly” evaluated by programmatic inspections (such as those of the QA program) because such programs affect the quality of the SSCs that are the subject of the ITAAC.

The verification of the implementation of the operational programs described in the FSAR will be performed prior to the authorization to load fuel.

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, “Documenting 10 CFR Part 52 Construction and Test Inspections.”

## 2504-05 RESPONSIBILITIES AND AUTHORITIES

### 05.01 Director, Office of New Reactors (NRO).

- a. Informs the Commission of the operational readiness of the plant and implementation status of the operational programs to support loading of fuel.
- b. Concurs, along with the Director, Office of Nuclear Reactor Regulation (NRR) and the host region Regional Administrator, with the decision of the Regional Administrator, Region II, to allow a plant to transition to the oversight of the host region.

### 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, with the concurrence of the Directors, NRO and NRR; and the host region Regional Administrator, to allow a plant to transition to the oversight of the host region.

### 05.03 Center for 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.

05.04 Director, Division of Construction Inspection and Operational Programs, NRO (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.

05.05 Regional Administrator, Host Region.

- a. Provides support, as necessary, to the Center for Construction Inspection staff, Region II, to conduct inspections of construction and operational programs.
- b. Concurs, along with the Directors, NRO and NRR, with the decision of the Regional Administrator, Region II, to allow a plant to transition to oversight by the host region.

05.06 Director, Office of Nuclear Reactor Regulation (NRR). Concurs, along with the Director, NRO, and the host region Regional Administrator, with the decision of the Regional Administrator, Region II, to allow a plant to transition to oversight by the host region.

2504-06 BACKGROUND AND OVERVIEW

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

- Construction Programs (including Pre-operational Testing)
- Operational Programs

The NRC staff 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 to this manual). The licensee's oversight of construction activities and QA implementation will be reviewed during all NRC inspections of construction and testing. Operational programs that do not have ITAAC will be listed in Chapter 13 of the FSAR (typically in Table 13.4-x) 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 that 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 implementation of its operational programs. The majority of operational programs, listed in Appendix B to this manual, will be established prior to initial fuel loading.

Region II and the host regions, with potential NRO technical staff support, will verify that (1) operational programs listed in Appendix B of this manual chapter are adequately established per regulatory requirements and (2) the appropriate 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. The results of these inspections, combined with an Operational Readiness Assessment Team (ORAT) inspection, will provide the basis for communicating to the Commission the status and readiness of a licensee's operational programs.

## 2504-07 GENERAL INSPECTION POLICY

### 07.01 Inspection Program Scheduling and Planning.

- a. The construction inspection staff will develop and implement an IP&S to accomplish the IPs in this Inspection Manual Chapter.
- b. The construction inspection staff must remain aware of the status of construction and testing activities in order to achieve appropriate inspection planning and to update the IP&S that will coordinate NRC inspection activities with licensee construction activities.
- c. The construction inspection staff establishes the appropriate inspection effort in the IP&S with consideration of the estimated resources identified in the IPs. The inspection procedures listed in this manual may not need to be implemented entirely in order to meet the objectives of this manual chapter or its procedures.

### 07.02 Construction Inspection Policy and Scope.

- a. The construction inspection staff will implement the construction inspection program to evaluate construction programs, pre-operational testing, operational programs, and the operational readiness of the plant.
- b. The construction inspection staff will inspect 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 levels specified in the IPs, 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. During the conduct of inspections the Inspection Staff will also make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation.

## 2504-08 DISCUSSION

This chapter provides guidance for implementing the construction and operational programs 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 security (including FFD); operational programs prior to fuel load; and pre-operational testing.

**08.01 Construction Programs.** The inspection of the licensee's construction program will focus on its programmatic elements. These include construction QA, the program for reporting defects under 10 CFR Parts 21 and 50.55(e), commercial-grade dedication programs, security (including FFD), and the process used to submit an ITAAC determination to the NRC for verification of its successful completion. Additionally, construction and pre-operational test will be conducted under this portion of the IMC. The inspection procedures for reviewing the licensee's construction programs are provided in Appendix A. In addition, there may be instances where the staff determines that license conditions or licensee commitments require inspection. For example, these could include geotechnical COLA commitments and geology license or permit conditions. These will be addressed on a plant-specific case-by-case basis.

- a. Construction QA Program - Sound construction and testing controls are assured by the licensee establishing and implementing a construction QA program that complies with the requirements of Appendix B to 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." NRC inspections of QA program implementation by licensees and their subcontractors will be performed during construction activities for safety-related SSCs, focusing on the 18 criteria contained in Appendix B to 10 CFR Part 50. 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 corrective action program.

The NRC will observe the implementation of the construction QA program during the performance of most NRC inspections. The inspection of the licensee construction QA program will also include the licensee's oversight of the QA programs of its contractors, whether work is performed onsite or at remote locations. This will allow the construction inspection staff to become aware of QA program deficiencies that must be corrected before the NRC can determine that an activity is acceptable.

For multi-unit facilities that use the same QA program to which no substantive changes have been made, the inspection of the QA program may be adjusted to reduce review of the program and increase focus on inspection of the implementation of the QA program for subsequent units. Therefore, sufficient inspection will be conducted to ascertain the adequacy of the QA program common to each unit.

- b. Program for Reporting Defects and Failure to Comply Per 10 CFR Parts 21 and 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 Parts 21 and 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 Parts 21 and 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 with regard to the procurement and acceptance of commercial-grade items for use as basic components in accordance with 10 CFR Part 21.
- d. 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.
- 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. Pre-Operational Testing - Regulatory Guide 1.68, Initial Test Programs for 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. "Pre-operational 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. Pre-operational testing will be inspected under IMC 2504 and initial startup testing will be inspected under IMC 2514.

Appendix B to this document identifies the general inspection procedures to be used for evaluating the 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. Appendix B identifies the procedure for each reactor design that specifies which tests will be inspected. Those pre-operational tests that contain targeted ITAAC will be inspected and additional tests, informed by risk, will also be inspected.

08.02 Operational Programs. The approach to inspection of operational programs reflects the staff positions detailed in SECY-05-0197, "Review of Operational Programs in a Combined License and General Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria."

- a. A listing of inspection procedures to be conducted to verify Operational Programs is provided in Appendix B of this manual.
- 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 of this manual, the NRC will assess each program's development and the 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.
- 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 establishment of a program that meets the requirements of Appendix B to 10 CFR Part 50. Particular emphasis will be placed on identification of problems by the licensee's QA program and timely correction of problems through the licensee's corrective action 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. Confirmation 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 report to the Commission will convey whether the status of operational programs is consistent with applicable regulations, license conditions, licensee commitments, and/or the FSAR. As discussed further in Section 09.02 below, it is recognized that some operational programs may not be fully implemented at the time of the 10 CFR 52.103(g) finding.
- f. Operational Readiness Assessment Team Inspections. 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 will 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 HOST REGION INSPECTION ACTIVITIES

09.01 Transition Milestone. A major focus of the construction inspection program is on licensee work being performed in support of ITAAC closure, which the staff inspects in accordance with IMC 2503. 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 10 CFR 52.103(g) finding represents the transition point (milestone) where the construction inspection program will end and the Reactor Inspection Program - Operations Phase will be implemented.

### 09.02 Plant Transition to the Host Region.

- a. Inspections of operational programs pursuant to this Manual Chapter prior to the 10 CFR 52.103(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 10 CFR 52.103(g) finding. These programs will be inspected at the first available opportunity subsequent to the 10 CFR 52.103(g) finding. Operational programs that require additional inspection after the 10 CFR 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.

- b. The transfer of the new plant to oversight by the host region will require the written approval of the Regional Administrator Region II, with the concurrence of the Director, NRR, Director NRO and the host region Regional Administrator.

## 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 host region 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. On a sampling basis, the NRC will verify that the licensee adequately corrects identified deficiencies.

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

Attachment:  
Revision History for IMC 2504

## 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.

<b>CONSTRUCTION PROGRAM INSPECTIONS</b>			
<b>Program</b>	<b>Requirement</b>	<b>IP No.</b>	<b>IP Title</b>
Quality Assurance (QA) - Construction	50.54(a) 50.55(f) Part 50, Appendix B	35007	Quality Assurance Program Implementation during Construction
Reporting Defects and Noncompliance - Construction	Part 21 50.55(e)(3)	36100	Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance
Commercial Grade Dedication - Construction	Part 21	43004	Inspection of Commercial Grade Dedication Programs
ITAAC Management	52.99	40600	Reserved for Licensee Program for ITAAC Management

<b>CONSTRUCTION PROGRAM INSPECTIONS</b>			
<b>Program</b>	<b>Requirement</b>	<b>IP No.</b>	<b>IP Title</b>
Security - Construction	50.34(c)	TBD	Security for Construction
	50.34(d)		
	50.34(e)		
	50.54(p)(1)	81504	Fitness for Duty Program for Construction
	50.54(v) Part 26, Subpart K		
Pre-operational Test Program		70367	Reserved for Part 52 Pre-operational Test Program Implementation
	50.34	70701	Reserved for Pre-Operational Testing for ABWR
	52.79(a)(28)	70702	Reserved for Pre-Operational Testing for AP 1000

## 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 low-power 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.

<b>OPERATIONAL PROGRAM INSPECTIONS</b>			
<b>Program</b>	<b>Requirement</b>	<b>IP No.</b>	<b>IP Title</b>
Inservice Inspection	50.55a(g)	73054	Part 52, Preservice and Inservice Inspection - Review of Program
		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
Preservice Inspection	50.55a(g)	73054	Part 52, Preservice and Inservice Inspection – Review of Program
		73055	Pre-service Inspection Data Review and Evaluation
Reactor Vessel Material Surveillance	50.60, App. H	50054	Reactor Vessel Material Surveillance Program
Preservice Testing	50.55a(f)	TBD	TBD

**OPERATIONAL PROGRAM INSPECTIONS**

<b>Program</b>	<b>Requirement</b>	<b>IP No.</b>	<b>IP Title</b>
Containment Leak Rate Testing	50.54(o)	70307	Containment Integrated Leak Rate Test Procedure Review
		70368	Reserved for Part 52 Containment Leak Rate Testing (Programmatic)
		70369	Reserved for Part 52 Containment Leak Rate Testing
Fire Protection	50.48	64705	Part 52, Fire Protection Operational Program
Process and Effluent Monitoring	50.34(b)(3), Part 50, App. I	84527	Part 52, Solid Waste Management
		84528	Reserved for Part 52, Liquid Waste Management System
		84529	Reserved for Part 52, Gaseous Waste Management System
		80522	Part 52 Radiological Environmental Monitoring Program (REMP)
		83746	Part 52, Offsite Dose Calculation Manual (ODCM)
Radiation Protection	Part 20, Subpart B	80522	Part 52, Radiological Environmental Monitoring Program (REMP)
		83533	Reserved for Part 52 External Occupational Exposure Control and Personal Dosimetry
		83534	Reserved for Part 52 Internal Exposure Control
		83535	Reserved for Part 52 Control of Radioactive Materials and Contamination, Surveys, and Monitoring
		83536	Reserved for Part 52 Facilities and Equipment
		83537	Reserved for Part 52 Maintaining Occupational Exposures ALARA
Non licensed Plant Staff Training Program	50.120 52.79(a)(33)	TBD	Review of Training and Qualification Programs

**OPERATIONAL PROGRAM INSPECTIONS**

<b>Program</b>	<b>Requirement</b>	<b>IP No.</b>	<b>IP Title</b>
Reactor Operator Training	52.79(a)(33), 55.13, 55.31, 55.41, 55.43, 55.45	TBD	Review of Training and Qualification Programs
		TBD	Operations Simulator Inspection
Reactor Operator Requalification	52.79(a)(34) 50.34(b) 50.54(i) 55.59	71111.11	Licensed Operator Requalification
		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) 50.54(v) Part 26, Subpart K	TBD	TBD
Quality Assurance (Operation)	Part 21 50.54(a) Part 50, Appendix B	35101	QA Program Implementation Inspection for Operational Programs
		35752	Part 52 - Procurement Control & Receipt, Storage and Handling of Equipment and Materials
		36100	Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance
		43004	Inspection of Commercial-Grade Dedication Programs
		36302	Part 52, Operational Staffing
		42401	Reserved for Part 52, Plant Procedures
		42453 42454	Part 52, Operating Procedures Inspection Part 52, Emergency Procedures
Maintenance Rule	50.65	62706	Maintenance Rule
Motor-Operated Valves	50.55a(b)(3)(ii)	TBD	TBD

**OPERATIONAL PROGRAM INSPECTIONS**

<b>Program</b>	<b>Requirement</b>	<b>IP No.</b>	<b>IP Title</b>
Initial Test Program	50.34 52.79(a)(28)	TBD	TBD
Operational Readiness	SECY-06-0114	93813	Reserved for Part 52 Operational Readiness Assessment Team Inspection

Attachment 1

Revision History for IMC 2504

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	04/25/06	Initial Issuance	None	N/A	N/A
N/A	10/03/07 CN 07-030	Rev 1, Revised through out to reflect changes in program, IP revisions, and editorial corrections.  Researched commitments for 4 years and found none.	None	N/A	ML072620276 ML072620292 ML072620283 ML072620289
N/A	10/15/09 CN 09-024	Complete rewrite to reflect substantial changes in program scope as well as revised and new IPs.	None	N/A	ML092460435