

# Field Policy Manual (FPM) Recommendations

FPM CHAPTER	TITLE	IMC DESTINATION	INFO TO BE INCLUDED IN IMC	IMC TITLE
8	Resident Inspector Relocation Policy	2506 (recommended)	(see Appendix C)	Not yet finalized
13	Witnessing Unsafe Situations	2503 07.02 Paragraph 2	after " ...risk significant concern." add "This includes any work practices that are unsafe or could lead to an unsafe situation. An inspector will make every reasonable attempt to stop such practices."	Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria
13	Witnessing Unsafe Situations	2504 07.02 (i)	Insert Part (i) to say "During the Inspection the Inspection Staff will also make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation."	Construction Inspection Program: Non-ITAAC Inspections
13	Witnessing Unsafe Situations	2512 07.02 Paragraph 1	after " ... and generic implications." add "Additionally, the inspector should make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation."	Light Water Reactor Inspection Program- Construction Phase
13	Witnessing Unsafe Situations	2507 Sec. 07.	Insert as 07.04 "During all inspections the inspector is expected to make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation."	Construction Inspection Program: Vendor Inspections
13	Witnessing Unsafe Situations	2508 05.05	after " ... assess computer codes." add "Additionally, the inspectors should make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation."	Construction Inspection Program: Design Certification

13	Witnessing Unsafe Situations	2501 Sec. 07	Insert as 07.05 "During all inspections the inspector is expected to make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation."	Construction Inspection Program: Early Site Permit (ESP)
13	Witnessing Unsafe Situations	2502 Sec. 07	Insert as 07.05 "During all inspections the inspector is expected to make every reasonable attempt to stop work practices that are unsafe or could lead to an unsafe situation."	Construction Inspection Program: Pre-Combined License (Pre-COL) Phase
18	Guidelines for Granting Exceptions... Multi-Unit Reactors	2506	(see Appendix A)	Not yet finalized
19	Guidance for Recommending Third Party Assistance to Licensees	2506	(See Appendix B)	Not yet finalized

## APPENDIX A

- Add: "Request approval from the Director, NRO/NRR, for proposed exceptions to the N+1 Policy."
  - To Regional Director's responsibilities
- Add: "Grant exception requests regarding the N+1 policy."
  - To Director of Office of New Reactors responsibilities
- Add: "Examine requests for exception to the N+1 Policy, and ensure that the policy is being consistently treated across the agency."
  - To Director of Division of Construction Inspection responsibilities

Insert the following passage where appropriate:

Exceptions may be granted to the N+1 policy for assigning resident inspectors to multi-unit reactor sites. The decision to grant said exception is based primarily on site performance. Any exception request must include the basis for the request and provided to the Chief, Regional Operations and Program Management Section, OEDO. Only after receiving the written approval of the Director, NRO, can the region implement the exception. The regions and NRR must monitor the exception site performance and confirm that the justifications remain valid. Concurrence from OEDO is not required to authorize exemptions, however OEDO will review the granted exception, focusing mainly on keeping consistent application across regions and site performance.

## APPENDIX B

Add the following where appropriate:

In the event that a licensee asks an NRC employee for help on selecting a suitable third-party for help solving a programmatic problem, the employee is unable to give any guidance per 5 CFR 2635.702. However, because the Agency's mission is to protect the public first and foremost, if the programmatic problem is an issue where health and public safety are involved, then the employee may contact NRC management who will then refer the licensee to a suitable equipment manufacturer. If there is not enough time to contact management, it is expected that the employee will refer the licensee himself. Afterwards the inspector must document the action and its justification.

## APPENDIX C

Add where appropriate in IMC 2506 (or more appropriate location...):

A resident inspector (RIs) has a maximum tour length of seven years. However this does not prohibit RIs from relocating for promotions, voluntary reassignments, or management-directed reassignments. The seven-year tour-length applies to total time on site, thus an RI who is promoted to Senior RI would not get a new seven-year tour at his current site from the time he was promoted. RIs may get approval for an extension from the Deputy Executive Director for Regulatory Programs. However if the tour comes to an end during the winter or spring, the relocation may be delayed to the summer months with their Regional Administrator approval rather than the DEDR. Once an RI leaves a site, he should not be reassigned to that site for the remainder of his career. RIs should not be moved to a site within the first four years of relocating, unless they are approved by the DEDR because of agency needs. This policy applies to all inspectors at any reactor sites, fuel facilities, and gaseous diffusion plants.