

APPENDIX C

FUEL CYCLE RESIDENT INSPECTION PROGRAM

General Policy.

Resident inspectors are assigned to the High Enriched Uranium (HEU) Facilities and the operating Gaseous Diffusion Plants (GDPs), and provide an onsite NRC presence for direct observation and verification of licensees' ongoing activities. The responsibilities of resident inspectors include: (1) completing core and supplemental inspections, (2) maintaining cognizance of major activities and current plant status, and (3) event response and evaluation. The greater part of initial event-related inspection effort will be performed by the resident inspectors and may be augmented by other inspectors depending on the type and significance of the event. Regional managers will decide when normal inspection activities will be resumed by those involved with inspecting events. The resident inspectors should also be aware of planned NRC inspections from both Headquarters and the Region.

Inspection Requirements.

It is this program's intent that the resident inspectors use the Inspection Procedures (IPs) as guidance during the inspection. The resident inspectors must review the specific requirements and commitments contained in the individual plant licenses, license applications, Integrated Safety Analyses (ISAs), Technical Safety Requirements, and Safety Analysis Reports (SARs), as applicable. The scope of an inspection in a particular functional area is not limited by the IP line items, but should include risk-significant safety controls and requirements contained in the associated safety bases documentation. It is recognized that a typical inspection can cover only a sample of the requirements and activities being conducted. Therefore, the resident inspectors are expected to exercise professional judgment to concentrate on those activities with the highest safety and safeguards risk. When a potential safety or safeguards issue is identified, the resident inspectors should focus on identification of the root cause(s) and the failures in the management control systems that allowed the problem to occur.

Resident Inspector Activities.

In-depth examinations of specialty areas, such as radiological controls, emergency preparedness, and physical security, will continue to be performed by Headquarters and Region-based specialists. The resident inspectors are expected to be generalists and should concentrate on implementation of the safety-basis commitments and various management control systems, such as the conduct of operations, problem identification and resolution, and configuration management systems. Resident inspectors will primarily use the resident inspector procedures for guidance and may select from among the fuel facility IPs for additional guidance in the area being examined. The resident inspectors are also expected to keep informed of site performance issues, potentially significant events, and other significant activities. Most inspections should emphasize the observation and evaluation of ongoing facility operations and supporting activities affecting the safety or safeguards function of facility structures, systems or components that are the most risk-significant.

Resident Inspector Policy.

The following is the general policy on the extent of resident inspector coverage:

- a. For sites staffed with two qualified resident inspectors, at least one qualified resident inspector or qualified headquarters or region-based alternate should provide site coverage during normal site working hours (Monday through Friday) such that there are no more than three consecutive normal work days in which there is no coverage (n.b., Friday-Tuesday are three consecutive working days). It is expected that gaps in excess of two days with no coverage should not occur more frequently than a few times a year. For sites staffed with only a single qualified resident inspector, at least one qualified resident inspector or qualified region-based alternate should provide site coverage during normal site working hours (Monday through Friday) such that there are no more than six consecutive normal work days in which there is no coverage. Alternate resident inspectors need not be qualified resident inspectors. In addition, in some circumstances as approved by Regional management, technical reviewers may provide NRC site presence after a review of site event notification, emergency response procedures and the NRC resident inspector's role.
- b. The Regional Administrator will be notified when the site inspector coverage can not be met. All exceptions will be highlighted in the quarterly update of the regional operating plan.
- c. Inspection activities performed at any time other than day shift (Monday-Friday) hours on non-holidays' are called "backshift" inspections. Inspection activities performed on Saturdays and Sundays, NRC holidays that are concurrent with licensee/certificate-holder holidays, and weeknight hours between about 10:00 p.m. and 5:00 a.m., are called "deep backshift" inspections. There are no set hours for backshift inspection because it is expected that the baseline inspection program will involve some backshift coverage on a routine basis. Resident inspectors should collectively devote at least 50 hours of direct inspection and plant status effort per year per site to deep backshift inspections. (This is a combined effort; no hours are assigned to an individual resident inspector). These efforts may only last for a couple of hours or as directed by line management. If deemed appropriate by regional management, this coverage may be provided by regional inspectors in lieu of or in addition to that performed by resident inspectors. Weekend inspections should occur at least once a month. Inspections on holidays will count as deep backshift only if the licensee or certificate-holder holiday is concurrent with the NRC holiday.

Inspectors should be sensitive to and avoid being predictable in scheduling their backshift and deep backshift coverage. In order to maximize the benefit of deep backshift coverage, inspectors should not develop a predictable pattern. Effort

should be made to spread the deep backshift coverage over a variety of days and working conditions (outage, normal operations, weekends, nights [including 10 p.m. to 5 a.m.], etc.).

END

ATTACHMENT 1

Revision History for IMC 2600, Appendix C

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	04/26/07 CN-07-014	Revised to incorporate the new inspection procedures developed to address changes to 10 CFR Part 70 and to reflect enhancements made to the fuel facility inspection program.	None	N/A	ML070610173
N/A	08/15/07 CN 07-025	Remove "OFFICIAL USE ONLY - SENSITIVE INTERNAL INFORMATION" designation from entire manual chapter to make publicly available.	None	N/A	ML072070428
N/A	04/27/10 CN 10-012	Revised to incorporate additional information on "backshift" inspections.	None	N/A	N/A