

13.4S Operational Program Implementation

Commission Paper SECY-05-0197 focused on those programs that meet the following three criteria: required by regulation, reviewed in the combined license (COL) application, and inspected to verify program implementation as described in the Final Safety Analysis Report (FSAR). Descriptions of these operational programs, consistent with the definition of “fully described” in the Staff Requirements Memorandum for SECY-05-0197, are provided in the FSAR sections noted in Table 13.4S-1. Implementation milestone commitments are also provided in the table. In accordance with SECY-05-0197, because these programs and their implementation are fully described, they will not require inspections, tests, analyses, and acceptance criteria.

Table 13.4S-1 Operational Programs Required by NRC Regulation and Program Implementation

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section | Implementation | |
|---|--|---|--------------------------|---|--|
| | | | | Milestone* | Requirement |
| 1 | Inservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4 6.6 | Commercial operation | 10 CFR 50.55a(g) ASME Section XI IWA-2430(b) |
| 2 | Inservice Testing Program | 10 CFR 50.55a(f) 10 CFR 50, App A | 3.9.6 5.2.4 | After generator on line on nuclear heat | 10 CFR 50.55a(f) ASME OM Code |
| 3 | Environmental Qualification Program | 10 CFR 50.49(a) | 3.11 | Fuel Load | License Condition |
| 4 | Preservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4 6.6 | Completion prior to initial plant startup | 10 CFR 50.55a(g) ASME Section XI IWB-2200(a) |
| 5 | Reactor Vessel Material Surveillance Program | 10 CFR 50.60 10 CFR 50, App H | 5.3.1 | Fuel Load | License Condition |
| 6 | Preservice Testing Program | 10 CFR 50.55a(f) | 3.9.6 | Fuel Load | License Condition |
| 7 | Containment Leakage Rate Testing Program | 10 CFR 50.54(o) 10 CFR 50, App A (GDC 32) 10 CFR 50, App J 10 CFR 52.47(a)(1) | 6.2.6 | Fuel load | 10 CFR 50, App J Option A - Section III Option B - Section III.A |
| * Implementation will occur prior to the milestone indicated. | | | | | |

Table 13.4S-1 Operational Programs Required by NRC Regulation and Program Implementation (Continued)

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section | Implementation | |
|---|---|--|--------------------------|--|-------------------|
| | | | | Milestone* | Requirement |
| 8 | Fire Protection Program | 10 CFR 50.48 | 9.5.1 | Receipt of fuel onsite (as pertains to fire protection for new fuel storage) Fuel load (complete program) | License Condition |
| 9 | Process and Effluent Monitoring and Sampling Program | | | | |
| | Radiological Effluent Technical Specifications/ Standard Radiological Effluent Controls (RETS/SREC) | 10 CFR 20.1301 10 CFR 20.1302 10 CFR 50.34a 10 CFR 50.36a 10 CFR 50, App I, Sect II & IV | 11.5 | Fuel Load | License Condition |
| | Offsite Dose Calculation Manual (ODCM) | Same as above | 11.5 | Fuel Load | License Condition |
| | Radiological Environmental Monitoring Program (REMP) | Same as above | 11.5 | Fuel Load | License Condition |
| | Process Control Program (PCP) | Same as above | 11.4 | Fuel Load | License Condition |
| * Implementation will occur prior to the milestone indicated. | | | | | |

Table 13.4S-1 Operational Programs Required by NRC Regulation and Program Implementation (Continued)

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section | Implementation | |
|---|---|--|--------------------------|--|-------------------|
| | | | | Milestone* | Requirement |
| 10 | Radiation Protection Program | 10 CFR 20.1101 | 12.5S | <p>The applicable portions of the Radiation Protection Program will be implemented by the following milestones:</p> <p>Initial receipt of byproduct, source or special nuclear materials (excluding exempt quantities)</p> <p>Receipt of fuel onsite</p> <p>Fuel load</p> <p>First shipment of radioactive waste</p> | License Condition |
| 11 | Non-Licensed Plant Staff Training Program | 10 CFR 50.120 10 CFR 52.78 | 13.2.2 | 18 months prior to scheduled fuel load | 10 CFR 50.120(b) |
| 12 | Reactor Operator Training Program | 10 CFR 55.13 10 CFR 55.31 10 CFR 55.41 10 CFR 55.43 10 CFR 55.45 | 13.2.1 | 18 months prior to scheduled date of fuel load | License Condition |
| 13 | Reactor Operator Requalification Program | 10 CFR 50.34(b) 10 CFR 50.54(i) 10 CFR 55.59 | 13.2.1 | Within 3 months after issuance of an operating license or the date the Commission makes the finding under 10 CFR 52.103(g) | 10 CFR 50.54(i-1) |
| * Implementation will occur prior to the milestone indicated. | | | | | |

Table 13.4S-1 Operational Programs Required by NRC Regulation and Program Implementation (Continued)

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section | Implementation | |
|---|--------------------|----------------------------------|--------------------------|--|---|
| | | | | Milestone* | Requirement |
| 14 | Emergency Planning | 10 CFR 50.47 10 CFR 50, App E | 13.3 | <p>Full participation exercise conducted within 2 years of scheduled date for initial fuel load</p> <p>Onsite exercise conducted within 1 year before the scheduled date for initial fuel load</p> <p>Applicant's detailed implementing procedures for its emergency plan submitted no less than within 180 days prior to scheduled date for initial fuel load</p> | <p>10 CFR 50, App E.IV.F.2a(ii)</p> <p>10 CFR 50, App E.IV.F.2a(ii)</p> <p>10 CFR 50, App E.V</p> |
| * Implementation will occur prior to the milestone indicated. | | | | | |

Table 13.4S-1 Operational Programs Required by NRC Regulation and Program Implementation (Continued)

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section | Implementation | |
|---|--|---|--------------------------|-------------------------------|-------------------|
| | | | | Milestone* | Requirement |
| 15 | Security Program | 10 CFR 50.34(c) | 13.6.1 | Fuel Receipt (Protected Area) | License Condition |
| | Physical Security Plan | 10 CFR 73.55 10 CFR 73.56 10 CFR 73.57 10 CFR 73.58 10 CFR 26 | | | |
| | Safeguards Contingency Plan | 10 CFR 50.34(d) 10 CFR 73, App C | | | |
| | Training and Qualification Plan | 10 CFR 73, App B | 13.6.1 | Fuel Receipt (Protected Area) | License Condition |
| | Cyber Security Program | 10 CFR 73.54 | | | |
| | Fitness for Duty | 10 CFR 26 | 13.7 | Fuel Receipt (Protected Area) | License Condition |
| | Fitness for Duty Program (Construction-Mgt & Oversight Personnel) | 10 CFR Part 26 Subparts A-H, N and O | 13.7 | Prior to initial Construction | 10 CFR 26 |
| | Fitness for Duty Program (Construction-Workers & First Line Supv.) | 10 CFR Part 26 Subparts K | 13.7 | Prior to initial Construction | 10 CFR 26 |
| * Implementation will occur prior to the milestone indicated. | | | | | |

Table 13.4S-1 Operational Programs Required by NRC Regulation and Program Implementation (Continued)

| Item | Program Title | Program Source (Required By) | FSAR (SRP) Section | Implementation | |
|---|--|--|--------------------------|--|--------------------|
| | | | | Milestone* | Requirement |
| 16 | Quality Assurance Program - Operation | 10 CFR 50.54(a) 10 CFR 50, App A (GDC 1) 10 CFR 50, App B | 17.5S | 30 days prior to scheduled date for initial fuel load | 10 CFR 50.54(a)(1) |
| 17 | Maintenance Rule | 10 CFR 50.65 | 17.6S | Fuel load authorization per 10 CFR 52.103(g) | 10 CFR 50.65(a)(1) |
| 18 | Motor-Operated Valve Testing | 10 CFR 50.55a(b)(3)(ii) | 3.9.6 | Fuel Load | License Condition |
| 19 | Initial Test Program | 10 CFR 50.34 10 CFR 52.79(a)(28) | 14.2S | First construction test (Construction Test Program) First preoperational test (Preoperational Test Program) Fuel load (Startup Test Program) | License Condition |
| 20 | Suppression Pool Cleanliness | 10 CFR 50.46 | 6.2.1.7 | Prior to Startup Program | License Condition |
| * Implementation will occur prior to the milestone indicated. | | | | | |

