



Transportation and Storage Licensing, Inspection, and Enforcement Programs Review

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Working Group

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Agenda

- Charter
- Evaluation Methods
- Observations
- Recommendations
- Next Steps

Charter

- SRM – COMSECY-10-0007
- Task – Identify improvements to increase efficiency and effectiveness
- Goal – Minimize increase in inspection resources necessary for execution

Evaluation Methods

- Review existing SFST and other NRC Offices' inspection-related documents
- Discussion with HQ and Regional inspectors and NRC stakeholders
- Stakeholder feedback
- Professional judgment and experience

Observations

SFST inspection program continues to assure safe and secure storage and transportation of radioactive material

Observations – Cont.

- IMC 2690 and inspection procedures are not sufficiently specific
- Experienced inspectors know what to do
- Increased clarity and consistency desired

Recommendations

- Focus
 - Clarify IMC 2690, procedures, and processes
 - Minimal additional inspection resources
 - Identified 12 recommendations

Recommendations – Cont.

1. **Revise IMC 2690 to define inspection requirements and organize IPs around key inspection areas**
2. **Revise IPs to identify inspection criteria and the regulatory bases**

Recommendations – Cont.

3. Revise and manage existing process to timely resolve open technical issues

4. Revise and manage existing license review process to integrate inspection into licensing process

Recommendations – Cont.

5. Make SFST staff possessing required technical skill available to perform 72.48 and 72.212 inspections

6. Assure the CoC holders and licensees capture conditions adverse to quality in their corrective action programs

Recommendations – Cont.

7. Develop a method for evaluating and classifying the severity of inspection findings
 - For SFST use only
 - Not a significance determination process
8. Perform trend analysis to identify emerging negative trends to inform the inspection program process

Recommendations – Cont.

9. Write inspection reports consistent in format and content per IMC 0610 to allow findings to be assessed and trended
10. Implement and manage the existing lessons learned process among Regional and headquarters inspectors

Recommendations – Cont.

11. Regional inspectors to participate in design and fabrication inspections to increase awareness

12. Develop an IP to address aging management plan inspections per NUREG-1927

Recommendations – Cont.

- Enforcement – No recommendations
- Metrics – To be developed

Next Steps

- SFST evaluating recommendations
- Additional review required
- Stakeholder feedback
 - Questions
 - Comments