
INSPECTION PROCEDURE 93815

PART 52, OPERATIONAL PROGRAMS IMPLEMENTATION INSPECTION

PROGRAM APPLICABILITY: 2504

93815-01 INSPECTION OBJECTIVES

The objective of this procedure is to provide guidance for conducting the Operational Programs Implementation Inspection (OPI) for new plants. Results from this inspection will provide the input by which the NRC staff will inform the Commission of the status of the new plant's operational programs, as discussed in SECY-06-0114, *Description of the Construction Inspection Program for Plants Licensed Under 10 CFR Part 52*. The schedule and scope of this inspection shall be tailored to the circumstances at individual plants. The OPI will be a joint effort by NRO/DCIP, the Center of Construction Inspections (CCI), and the new plant's host Regional Office.

93815-02 INSPECTION REQUIREMENTS AND GUIDANCE

General Guidance: The OPI will ascertain the status of the licensee's development and implementation of operational programs necessary to support plant operations. (See Attachment 1 for a list of applicable operational programs). The status of licensee implementation of operational programs and milestones described in the Combined License (COL) and its associated license conditions will be inspected.

This inspection is intended as a follow-up to previously conducted IMC-2504 inspections of the specific operational programs listed in *Appendix B of IMC-2504*. Open items from those previous inspections will be the focus of the OPI.

02.01 Inspection Planning.

The OPI should be conducted in two phases to ascertain the status of the licensee's development and implementation of programs necessary to support operation.

Phase 1 of the inspection is a "ready review" and is to be performed after the licensee submits the 225-day notification required by 10 C.F.R. §52.99(c)(2). Phase I will determine:

- a. The status of all operational programs listed in *Appendix B of IMC-2504*. It is understood that some programs will not be fully developed at this stage of project completion and will be stated in the inspection report.

- b. The status of inspections required by IMC 2504 and identify all remaining open items associated with the programs or inspections of the programs. That information is obtained from the Construction Reactor Oversight Program (cROP) using Construction Inspection Program Information Management System (CIPIMS) database.

Following completion of the Phase 1 Ready Review, a letter will be sent to the licensee that informs the licensee of the NRC's readiness to conduct Phase 2.

Phase 2 is the OPI itself and is to be conducted 1-2 months prior to the anticipated fuel load. Twenty-four hour inspection coverage of shift operations may be useful at various times during the inspection if there are backshift activities in process that are important to observe. This inspection will:

- a. Inspect all the open items and disposition those open items related to programs required before fuel load.
- b. Obtain direct observation of the programs listed in [Appendix B of IMC-2504](#).
- c. Assess the acceptability of open items related to programs required after fuel load and factor that into the status determination.

Guidance: The timing of the OPI should be coordinated with other NRC and third party inspection activities, such as the conduct of the INPO Preoperational Assistance visit at the site.

The scope of the inspection will cover all the IMC 2504 operational programs over a two-week time period using a team of five to seven inspectors from NRO/DCIP, the CCI, and the new plant's host Region.

Inspectors who have operating plant experience should be selected. Resident inspectors from similar units and experienced inspectors from the Regions or Offices of New Reactors (NRO) and Nuclear Reactor Regulation (NRR) are preferred. A licensing examiner should also be included on the inspection team to review reactor operator training status.

The OPI will form the basis of the Staff's opinion of the status of licensee compliance with FSAR and license condition commitments to develop and implement operational programs prior to fuel load. This opinion will then inform the "Staff Statement Regarding the Status of Operational Programs" Commission information paper provided before the licensee's anticipated date for loading fuel. Attachment 1 of this procedure is provided as a template to develop the inspection report.

93815-03 RESOURCE ESTIMATE

The OPI is estimated to require 640 direct inspection hours of regional and headquarters resources. Actual inspections at a specific plant may require substantially more or fewer resources, depending on the level of licensee preparation prior to the inspection. The Phase 1 portion of the inspection requires 80 hours (team leader and one inspector for 1 week). The Phase 2 portion of the inspection requires 560 hours (team leader and six inspectors for 2 weeks).

93815-04 REFERENCES

SECY 06-0114, "Description of the Construction Inspection Program for Plants Licensed under 10 CFR Part 52"

NRC Inspection Manual Chapter 2504

NUREG-0800, Chapter 13.4, "Standard Review Plan – Operational Programs," Revised Mar 2007.

93815-05 PROCEDURE COMPLETION

The inspection is completed when all operational programs are inspected and their development and implementation status has been ascertained and before the 10 CFR 52.103(g) finding is issued by the Commission.

END

| Attachment 1 – [Documentation of OPI Results](#)

| Attachment 2 – [Revision History for IP 93815](#)

Attachment 1
Documentation of OPI Results

Operational Programs Status – The OPI report should document the results of the inspection as follows:

(i) Inservice Inspection

The review team evaluated the status of the licensee's inservice inspection program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's inservice inspection program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's inservice inspection program is adequate to support low power operations and testing.

(ii) Inservice Testing

The review team evaluated the status of the licensee's inservice testing program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's inservice testing program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's inservice testing program is adequate to support low power operations and testing.

(iii) Environmental Qualification

The review team evaluated the status of the licensee's environmental qualification

program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's environmental qualification program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's environmental qualification program is adequate to support low power operations and testing.

(iv) Preservice Inspection

The review team evaluated the status of the licensee's preservice inspection program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's preservice inspection program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's preservice inspection program is adequate to support low power operations and testing.

(v) Reactor Vessel Material Surveillance

The review team evaluated the status of the licensee's reactor vessel material surveillance program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's reactor vessel material surveillance program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's reactor vessel material surveillance program is adequate to support low power operations and testing.

(vi) Preservice Testing

The review team evaluated the status of the licensee's preservice testing program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's preservice testing program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's preservice testing program is adequate to support low power operations and testing.

(vii) Containment Leak Rate Testing

The review team evaluated the status of the licensee's containment leak rate testing program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's containment leak rate testing program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's containment leak rate testing program is adequate to support low power operations and testing.

(viii) Fire Protection

The review team evaluated the status of the licensee's fire protection program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's fire protection program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's fire protection program is adequate to support low power operations and testing.

(ix) Process and Effluent Monitoring

The review team evaluated the status of the licensee's process and effluent monitoring program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's process and effluent monitoring program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's process and effluent monitoring program is adequate to support low power operations and testing.

(x) Radiation Protection

The review team evaluated the status of the licensee's radiation protection program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's radiation protection program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The

team concludes that the status of the licensee's radiation protection program is adequate to support low power operations and testing.

(xi) Non-Licensed Plant Staff Training Program

The review team evaluated the status of the licensee's non-licensed plant staff training program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's non-licensed plant staff training program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's non-licensed plant staff training program is adequate to support low power operations and testing.

(xii) Reactor Operator Training

The review team evaluated the status of the licensee's reactor operator training program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's reactor operator training program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's reactor operator training program is adequate to support low power operations and testing.

(xiii) Reactor Operator Requalification

The review team evaluated the status of the licensee's reactor operator requalification program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open

issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's reactor operator requalification program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's reactor operator requalification program is adequate to support low power operations and testing.

(xiv) Emergency Preparedness

The review team evaluated the status of the licensee's emergency preparedness program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's emergency preparedness program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's emergency preparedness program is adequate to support low power operations and testing.

(xv) Security (including training, vehicle and personnel access, FFD and safeguards contingencies)

The review team evaluated the status of the licensee's security program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's security program is (adequate or not adequate) to support low-power operations and testing]*.

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's security program is adequate to support

low power operations and testing.

(xvi) Quality Assurance (Operation)

The review team evaluated the status of the licensee's quality assurance (operation) program in light of the previous IMC-2504 inspections on *[insert dates of previous inspections]* and the open issues from those inspections.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's quality assurance (operation) program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's quality assurance (operation) program is adequate to support low power operations and testing.

(xvii) Maintenance Rule

The review team evaluated the status of the licensee's maintenance rule program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's maintenance rule program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's maintenance rule program is adequate to support low power operations and testing.

(xviii) Motor-Operated Valves

The review team evaluated the status of the licensee's motor-operated valves program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open*

issues]. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's motor-operated valves program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's motor-operated valves program is adequate to support low power operations and testing.

(xix) Initial Test Program

The review team evaluated the status of the licensee's initial test program in light of the previous IMC-2504 inspection on *[insert date of previous inspection]* and the open issues from that inspection.

As a result of the review, the inspection team was able to close *[insert number]* open issues. *[Insert number]* issues remain open. These open issues are *[insert list of open issues]*. *[Based on the team's review of these remaining open issues, the team concludes that the status of the licensee's initial test program is (adequate or not adequate) to support low-power operations and testing].*

OR

As a result of the review, the inspection team was able to close all open issues. The team concludes that the status of the licensee's initial test program is adequate to support low power operations and testing.

Attachment 2
Revision History For IP93815

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	12/23/11 CN 11-043 ML113350218	Initial Issue	None	N/A	ML113350224