

### **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)
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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		
	Physical Security Plan	10 CFR 73.55 10 CFR 73.56 10 CFR 73.57 10 CFR 73.58 10 CFR 26		Fuel Receipt (Protected Area)	License Condition
	Safeguards Contingency Plan	10 CFR 50.34(d) 10 CFR 73, App C		Fuel Receipt (Protected Area)	License Condition
	Training and Qualification Plan	10 CFR 73, App B		Fuel Receipt (Protected Area)	License Condition
	Cyber Security Program	10 CFR 73.54	13.6.1	Fuel Receipt (Protected Area)	License Condition
	Fitness for Duty	10 CFR 26	13.7	Fuel Receipt (Protected Area)	License Condition
	<del>Fitness for Duty</del> FFD Program (Construction-Mgt & Oversight Personnel)	10 CFR Part 26 Subparts A-H, N and O	13.7	Prior to <del>initial</del> <u>initiating 10 CFR 26 construction activities</u>	10 CFR 26
<del>Fitness for Duty</del> FFD Program (Construction-Workers & First Line Supv.)	10 CFR Part 26 Subparts K	13.7	Prior to <del>initial</del> <u>initiating 10 CFR 26 construction activities</u>	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
	<u>FFD Program for security personnel</u>	<u>10 CFR Part 26 Subparts A-H, N and O</u>  <u>10 CFR Part 26 Subparts A-I, N and O</u>	<u>13.7</u>	<u>Prior to initiating 10 CFR 26 construction activities</u>  <u>Prior to the earlier of:</u> <u>(a) Receipt of SNM in the form of fuel assemblies</u> <u>(b) Establishment of a protected area, or</u> <u>(c) 10 CFR 103(g) finding</u>	<u>10 CFR 26</u>
	<u>FFD Program for FFD Program personnel</u>	<u>10 CFR Part 26 Subparts A, B, D-H, N, O and C per licensee's discretion</u>	<u>13.7</u>	<u>Prior to initiating 10 CFR 26 construction activities</u>	<u>10 CFR 26</u>
	<u>FFD Program</u>	<u>10 CFR Part 26 Subpart K</u>	<u>13.7</u>	<u>Prior to initiating 10 CFR 26 construction activities</u>	<u>10 CFR 26</u>
	<u>FFD Program for persons required to physically report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF)</u>	<u>10 CFR Part 26 Subparts A-I, N and O, except for Parts 26.205-209</u>		<u>Prior to the conduct of the first full-participation emergency preparedness exercise under 10 CFR Part 50, App. E, Section F.2.a</u>	<u>10 CFR 26</u>
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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
	<a href="#">FFD Program for operation</a>	<a href="#">10 CFR Part 26 Subparts A-I, N and O, except for individuals listed in Part 26.4(b) who are not subject to Part 26.205-209</a>		<a href="#">Prior to the earlier of:</a>  <a href="#">(a) Establishment of a protected area, or</a>  <a href="#">(b) 10 CFR 52.103(g) finding</a>	<a href="#">10 CFR 26</a>
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
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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
<u>21</u>	<u>SNM Material and Accounting Program</u>	<u>10 CFR 74, Subpart B (74.11-19, excl. 74.17)</u>	<u>13.5.3.4.1</u>	<u>Prior to receipt of special nuclear material</u>	<u>License Condition</u>
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