

NRC INSPECTION MANUAL

FCSS

INSPECTION PROCEDURE 88135

RESIDENT INSPECTION PROGRAM FOR
CATEGORY I FUEL CYCLE FACILITIES

88135-01 INSPECTION OBJECTIVES

The objectives of this procedure are to provide requirements and guidance to evaluate the licensee's performance and to determine whether it conforms to regulatory requirements, license conditions and other commitments, and is in accordance with established procedures pertaining to inspectable areas within the following Performance Areas:

- a. Safety Operations (SO), including plant operations, nuclear criticality safety, fire protection, chemical safety, and items relied on for safety (IROFS) to ensure they are available and reliable to perform their function when needed to comply with the performance requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 70.61;
- b. Safeguards, including material control and accounting physical protection of special nuclear material, and classified material and information security;
- c. Radiological Controls, including radiation protection, environmental protection, waste management, and transportation.
- d. Facility Support (FS), including maintenance and surveillance of safety controls, management organization and controls, operator training, emergency preparedness, emergency exercise evaluation, permanent plant modifications, and the identification and resolution of corrective actions consistent with risk-significance.
- e. Other Areas, including special issues that arise for which their significance is perceived to affect the quality of licensee performance, event review and response.

88135-02 INSPECTION REQUIREMENTS AND GUIDANCE

02.01 Technical Areas of Review.

- a. The inspection requirements and specific guidance is contained in the attachments to this procedure.

02.02 Risk-Informed Inspection Planning.

- a. Inspection Requirement. Include risk-significant items or issues identified during plant status tours, meetings, and record reviews in inspection planning and implementation.
- b. Inspection Guidance. Use plant-specific risk information to determine what systems and activities are of higher risk significance given the plant configuration. The selection of risk-informed inspection areas should be based on the following:
 1. The opportunity to gather risk insights from process safety information, the Integrated Safety Analysis (ISA);

2. The need to select IROFS, and activities for inspection, based on risk insights; and
3. The goal of using insights from plant-specific and industry operational experience to identify IROFS for inspection.

During plant status tours, inspectors should observe plant status information that may be used to adjust their inspection plans.

The inspector should utilize the appropriate inspection procedure whenever inspection activities shifts from collecting status information to evaluating a potential inspection issue. The inspector should utilize the appropriate inspection procedure if an information collection activity is expected to exceed ½ hour for any single issue.

Security-related issues identified during tours of the facility shall be referred to security specialists in the region for follow-up inspection(s), as appropriate. The inspector should seek the concurrence of the site branch chief prior to making this transition.

02.03 Third-Party Reports.

- a. Inspection Requirement. Review the results of third-party reports as applicable. Determine whether the licensee evaluated the results and initiated corrective actions.
- b. Inspection Guidance. Third-party reviews may be initiated to address and resolve significant safety issues identified by the licensee, **U.S. Nuclear Regulatory Commission** or other agencies.

When a third-party report is reviewed and evaluated, record only the fact that the evaluation was performed. Do not record any of the specific findings that were contained within the report.

02.04 Annual Inspections.

- a. Inspection Requirements
 1. Observe an emergency preparedness drill.
 2. Observe a tactical response team exercise.
- b. Inspection Guidance None needed

88135-03 RESOURCE ESTIMATE

The total estimated hours to complete this inspection procedure and all its attachments annually is estimated to be 1504 staff hours for sites with two residents, and 752 staff hours for sites with only one resident.

88135-04 REFERENCES

10 CFR 70.61, "Domestic Licensing of Special Nuclear Material," Subpart H, "Performance Requirements"

10 CFR 70.62, "Safety Program and Integrated Safety Analysis"

Manual Chapter 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program"

Manual Chapter 2604, "Licensee Performance Review"

Manual Chapter 2515, Appendix D, "Objectives and Philosophy of Plant Status Activities"

88135-05 PROCEDURE COMPLETION

05.01 Technical Areas of Review. Implementation of each attachment will constitute completion of this procedure. Areas to be inspected and the breadth of review needed will be determined by the inspector based on the risk-significance of the activity and the extent of the activity or records available when specific sample sizes are not prescribed in the inspection guidance section.

05.02 Risk-Informed Inspection Planning. Implementation of each attachment will constitute completion of this procedure. Areas to be inspected and the breadth of review needed will be determined by the inspector based on the degree to which requirements have been complied with, the risk-significance of the activity, and the extent of the activity or records available when specific sample sizes are not prescribed in the inspection guidance section.

05.03 Third-Party Reports. There are no specific sample sizes required by this section. However, if an inspector reviews a third-party report, the review should be documented in the quarter in which it was completed.

05.04 Annual Inspections. Inspection of the minimum sample size will constitute completion of this procedure. Specifically, the minimum sample size is recommended to consist of one observation of each of the listed activities per year as described in Section 02.04 and documented in the quarter in which it occurred.

END

ATTACHMENTS:

- 02: Resident Inspection Program Plant Status Activities (SO)
- 04: Resident Inspection Program ISA Implementation (FS)
- 05: Resident Inspection Program Fire Protection (Annual and Quarterly) (SO)
- 19: Resident Inspection Program Post-Maintenance Testing (FS)
- 17: Resident Inspection Program Permanent Plant Modifications (FS)
- 22: Resident Inspection Program Surveillance Testing (FS)

Attachment:

Revision History for IP 88135

Attachment 1 -Revision History for IP 88135

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	12/02/09 CN 09-029	This document has been revised to: (1) emphasize the risk-informed, performance based approach to inspection, (2) impose changes to inspection activities due to orders issued that have not been incorporated by rulemaking. Completed 4 year historical CN search.	N/A	N/A
N/A	ML13233A169 02/07/14 CN 14-005	Revised in its entirety ¹	N/A	ML13354B8 83

¹ Specific changes include:

- Where it was determined that to maintain specific program elements within the 88135 base procedure (such as elements related to fire protection) would make the procedure too cumbersome, these elements were broken out separately using attachments.
- Breakout of inspection requirements into attachments.
- Incorporated specific language requiring that inspection planning be risk-informed.
- Incorporated specific language requiring inspectors to address corrective action program effectiveness when performing inspections.
- Incorporated program weaknesses identified in the July 2010 Self-Assessment of the Division of Fuel Facility Inspection Program recommending inspection procedures focus less on the observation of maintenance procedures and more on post-maintenance testing and surveillance testing.
- When developing a numbering system for the Attachments, an effort was made to maintain numbering that would coincide with the numbering of Attachments used in the ROP (i.e. 71111 series of IPs). Where no corresponding Attachment number existed, a reserved number was used. This was done with a consideration that the fuels inspection program might more closely align with the reactor inspection program in the future.
- Revised format to comply with the requirements of IMC 0040.