

**INFORMATION NOTICE 2018-06
DETERMINATION OF MANAGEMENT MEASURES FOR
PROCESS ISOLATION CONTROLS DESIGNATED AS ITEMS
RELIED ON FOR SAFETY AND IMPLEMENTATION OF
ADEQUATE QUALITY ASSURANCE MEASURES FOR PLANT
FEATURES AND PROCEDURES**

April Smith, Ph.D., Reliability and Risk Analyst
Programmatic Oversight & Regional Support
Branch
Division of Fuel Cycle Safety, Safeguards, and
Environmental Review

OVERVIEW

- ADDRESSEES
- DESCRIPTION OF CIRCUMSTANCES
- REGULATORY BACKGROUND
- DISCUSSION

ADDRESSEES

Facilities licensed under:

- Title 10 of the Code of Federal Regulations (10 CFR) Part 40, “Domestic licensing of source material”
- 10 CFR Part 70, “Domestic licensing of special nuclear material”
- Holders or applicants of a construction permit or operating license for production facilities, including the production of medical isotopes.

DESCRIPTION OF CIRCUMSTANCES

- Between 2016 and 2017, NRC inspectors identified inadequate management measures or quality assurance (QA) measures for isolation controls credited for preventing or mitigating releases of hazardous material.
 - Honeywell Metropolis Works (Honeywell)
 - Nuclear Fuel Services, Inc. (NFS)
 - Global Nuclear Fuels – Americas (GNF-A)

REGULATORY BACKGROUND

- Subpart H of 10 CFR Part 70
 - 70.61(e) establishes the performance requirement of designating IROFS and ensuring those IROFS are available and reliable to perform their intended functions when needed.
 - 10 CFR 70.62(d) designates management measures as the mechanism for complying with all the performance requirements of 10 CFR 70.61, including 10 CFR 70.61(e).

REGULATORY BACKGROUND

- 10 CFR Part 70.4 defines management measures:
“...the functions performed by the licensee, generally on a continuing basis, that are applied to items relied on for safety, to ensure the items are available and reliable to perform their functions when needed. Management measures include configuration management, maintenance, training and qualifications, procedures, audits and assessments, incident investigations, records management, and other quality assurance elements.”

REGULATORY BACKGROUND

- Confirmatory Order EA-12-157 requires Honeywell, in part, to :
 - Develop and implement QA measures to address vulnerabilities from external events such as natural hazard phenomena.
 - Address design, procurement, inspections and tests, installation, document control, procedures and drawings, and records.

DISCUSSION

- Actual operating conditions may affect manufacturer-cited failure rates.
 - Temperature, humidity, process fluid corrosiveness
 - Cycling needs or resting versus actuation states
- Licensees encouraged to evaluate administrative controls dependent on engineered components.

QUESTIONS?