

FUEL CYCLE RESIDENT INSPECTION PROGRAM

2600C-01 GENERAL POLICY

Resident inspectors are assigned to the High Enriched Uranium (HEU) Facilities and provide an onsite NRC presence for direct observation and verification of licensees' ongoing activities. The responsibilities of resident inspectors include: (1) completing core and supplemental inspections, (2) maintaining cognizance of major activities and current plant status, and (3) event response and evaluation. The greater part of initial event-related inspection effort will be performed by the resident inspectors and may be augmented by other inspectors depending on the type and significance of the event. Regional managers will decide when normal inspection activities will be resumed by those involved with inspecting events. The resident inspectors should also be aware of planned inspections.

2600C-02 INSPECTION REQUIREMENTS

The resident inspectors should use the Inspection Procedures (IPs) as guidance during the inspection and review the specific requirements and commitments contained in the individual plant licenses, license applications, Integrated Safety Analyses (ISAs), Technical Safety Requirements, and Safety Analysis Reports (SARs), as applicable. The scope of an inspection in a particular functional area is not limited by the IP line items but should include risk-significant safety controls and requirements contained in the associated safety bases documentation. Because a typical inspection can cover only a sample of the requirements and activities being conducted, therefore, the resident inspectors are expected to exercise professional judgment to concentrate on those activities with the highest safety and safeguards risk. When a potential safety or safeguards issue is identified, the resident inspectors should focus on identification of the root cause(s) and the failures in the management control systems that allowed the problem to occur.

2600C-03 RESIDENT INSPECTOR ACTIVITIES

In-depth examinations of specialty areas, such as radiological controls, emergency preparedness, and physical security, will be performed by regional inspectors. The resident inspectors are expected to be generalists and should concentrate on implementation of the safety-basis commitments and various management control systems, such as the conduct of operations, problem identification and resolution, and configuration management systems. Resident inspectors will primarily use the resident inspector procedures for guidance and may select from among the fuel facility IPs for additional guidance in the area being examined. The resident inspectors are also expected to keep informed of site performance issues, potentially significant events, and other significant activities. Most inspections should emphasize the observation and evaluation of ongoing facility operations and supporting activities affecting the safety or safeguards function of facility structures, systems or components that are the most risk-significant.

2600C-04 RESIDENT INSPECTOR POLICY

The following is the general policy on the extent of resident inspector coverage:

- a. Sites staffed with only a single qualified resident inspector, at least one qualified resident inspector or qualified region-based alternate should provide site coverage during normal site working hours (Monday through Friday) such that there are no more than six consecutive normal work days in which there is no coverage. Alternate resident inspectors need not be qualified resident inspectors. In addition, in some circumstances as approved by Regional management, technical reviewers may provide NRC site presence after a review of site event notification, emergency response procedures and the NRC resident inspector's role.
- b. The Regional Administrator will be notified when the site inspector coverage can not be met.
- c. Inspection activities performed at any time other than day shift (Monday-Friday) hours on non-holidays are called "backshift" inspections. Inspection activities performed on Saturdays and Sundays, NRC holidays that are concurrent with licensee holidays, and weeknight hours between about 10:00 p.m. and 5:00 a.m., are called "deep backshift" inspections. There are no set hours for backshift inspection because the baseline inspection program will involve some backshift coverage on a routine basis. Resident inspectors should devote at least 50 hours of direct inspection and plant status effort per year per site to deep backshift inspections. These efforts may only last for a couple of hours or as directed by management. If deemed appropriate by regional management, this coverage may be provided by regional inspectors in lieu of, or in addition to, that performed by resident inspectors. Inspections on holidays will count as deep backshift only if the licensee holiday is concurrent with the NRC holiday.

Inspectors should be sensitive to, and avoid being predictable in, scheduling their backshift and deep backshift coverage. In order to maximize the benefit of deep backshift coverage, inspectors should not develop a predictable pattern. Effort should be made to spread the deep backshift coverage over a variety of days and working conditions (outage, normal operations, weekends, nights [including 10 p.m. to 5 a.m.], etc.).

- d. Incoming permanent resident assignments will typically be made to allow for approximately three months of turnover time with the incumbent resident inspector but shall not exceed six months without approval of the Regional Administrator.

During the resident inspector turnover period, the relieving resident inspector shall only charge direct inspection time to the licensee. All other time will be charged to the appropriate non-fee billable codes.

During the turnover period, the region should closely manage the inspection resources at the sites which are impacted to ensure that resources expended to complete the NRC's baseline inspection program are not increased solely as a result of the additional resident inspector(s) being assigned to the site.

2600C-05 RESIDENT INSPECTOR RELOCATION

All resident inspector assignments will stipulate a seven-year maximum tour length. This policy does not preclude resident inspectors from relocating for promotions, voluntary reassignments, or management-directed reassignments.

- a. Resident inspectors are expected to relocate from the site assignment after 7 years. Resident inspectors due to rotate during the winter months or early spring may be granted an extension to the summer months with Regional Administrator approval. Any other extensions beyond the 7-year maximum tour length must be approved by the Deputy Executive Director for Materials, Waste, Research, State, Tribal, and Compliance Programs (DEDMRT).
- b. As resident inspectors approach the 7-year point at a site, the agency will consider inspector requests for a lateral transfer. Earlier transfers can be made when consistent with agency needs. In either case, resident inspectors are encouraged to make their desires and career goals known to their management as far in advance as possible.
- c. Resident inspectors should not normally be reassigned to the same facility even after an intervening assignment. Reassignments may be made to co-located facilities that would cause resident inspectors to interact with a different licensee.
- d. This policy applies to total site tour length and it is not affected by a promotion from resident inspector to senior resident inspector at a site.
- e. Resident inspectors should not be assigned to a different location within the first four years after relocating unless specifically approved by the DEDMRT based on identified agency needs.

END

ATTACHMENT 1

Revision History for IMC 2600, Appendix C

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML070610166 04/26/07 CN-07-014	Revised to incorporate the new inspection procedures developed to address changes to 10 CFR Part 70 and to reflect enhancements made to the fuel facility inspection program.	None	ML070610173
N/A	ML072070168 08/15/07 CN 07-025	Remove "OFFICIAL USE ONLY - SENSITIVE INTERNAL INFORMATION" designation from entire manual chapter to make publicly available.	None	ML072070428
N/A	ML101160503 04/27/10 CN 10-012	Revised to incorporate additional information on "backshift" inspections.	None	N/A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML15058A260 09/24/15 CN 15-018	<p>Delete reference to GDPs and certificates.</p> <p>Removed Resident Inspector Coverage for Sites with two resident inspectors.</p> <p>Removed guidance for one weekend inspection per month.</p> <p>Included Resident Inspection Relocation section per instruction of January 13, 2009 memo, "Analysis of Options and Recommendations for Management the Field Policy Manual" (ADAMS Accession No. ML090070444).</p>	None	ML15058A244
N/A	ML19197A315 10/09/19 CN 19-033	Provide clarification on Category 1 senior resident inspector turnovers to include a typical turnover period and Regional Administrator permission to exceed that time period. Also included is guidance for charging hours during the turnover to prevent excessive direct hours being billed due to the double-encumbered situation.	None	N/A