



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 17, 2020

MEMORANDUM TO: John W. Lubinski, Director
Office of Nuclear Material Safety and Safeguards

Laura A. Dudes, Regional Administrator, RII

FROM: Andrea L. Kock, Director */RA/*
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

SUBJECT: IMPLEMENTATION OF RESIDENT INSPECTOR COVERAGE
AT CATEGORY I FUEL FACILITIES DURING COVID-19

This memorandum provides guidance on resident office coverage at Category I fuel facilities during maximum teleworking for COVID-19. The purpose of this guidance is to protect the health of inspectors and site personnel, while maintaining oversight that supports reasonable assurance of adequate protection of public health and safety. The end date of this guidance is until further notice. The Division of Fuel Management (DFM) and the Division of Fuel Facility Inspection (DFFI) in RII will continue to assess this guidance and update it as needed.

The Region II Office is encouraged to use the attached table. Emphasis should be placed on maximizing the use of reduced on-site time to assess the licensees' activities. Particular attention should be paid to the changing circumstances and how those affect the margin to safety. The Region II Office will have the flexibility to increase or decrease facility coverage based on the following considerations:

- The specific health and safety circumstances of individual inspectors and their families, and availability of other inspectors as appropriate.
- Facility risk configuration (e.g., items relied on for safety (IROFS), outage activities, planned maintenance activities, alternative staffing mechanisms).
- Ability to maintain awareness of facility safety and safeguards performance (facility conditions and Corrective Action Program entries) and planned activities, e.g., outage work and maintenance activities, from the resident inspectors' remote work locations, including the quality of connectivity and information availability.
- The need to access classified information not available remotely.

CONTACT: Alayna N. Pearson, NMSS/DFM
301-415-3174

- COVID-19 conditions at the facility (confirmed COVID-19 cases, where and when).
- The local COVID-19 conditions around the facility and the community where the inspectors reside, including directions from local authorities.

When elevated risk of COVID-19 infections are present in the local community or at a fuel facility, inspectors should contact regional management to determine the best practices to consider for remote and onsite activities, informed by licensee practices and requests, and coordinated with NRC COVID-19 guidance. Regional management should increase engagement with facility management as inspector coverage decreases.

Following the COVID-19 public health emergency, DFM and DFFI will assess impacts to the oversight program for fuel facilities and determine the need for a full or modified program. In the meantime, regional managers should work with inspectors to conduct the core program as appropriate, given the flexibilities and guidance in this memorandum.

Enclosure:
As stated

cc: C. Regan

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| OFFICE | DFM/IOB | RII/DFFI | DFM |
| NAME | APearson | LSuggs | ALKock |
| DATE | 04/16/2020 | 04/16/2020 | 04/16/2020 |

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DFFI Resident Office Site Coverage and Baseline Inspection During Maximum Teleworking for COVID-19

In support of Federal Government-wide efforts to maximize teleworking, this guidance is for Division of Fuel Facility Inspection (DFFI) Resident Inspector staff to support social distancing efforts, while maintaining site coverage using telework. NRC will continuously assess this guidance and update it accordingly as the situation develops. Effective immediately until further notice:

- 1) Resident inspectors are to establish remote access to the maximum extent made possible.
- 2) All resident inspector staff are to telework and practice social distancing techniques as described in the table.
- 3) Regional management shall determine the need for and authorize any onsite inspection activities if warranted, considering the guidance in the table.

| Work Status | Plant Status | Event Response | Baseline Inspections |
|---|--|---|--|
| <p>Consistent with IMC 2600 (ROI 0702) provisions regarding site coverage, each site should at a minimum be visited by a resident once every six days, barring event response requirements. Nominally, SRIs will visit 1-2 times per week unless determined otherwise by Region II management.</p> | <p>Practice social distancing when on site and follow site specific requirements for COVID-19.</p> <p>Remotely access licensee information using available technology. Focus on independent review of important plant parameters and status of COVID-19 actions being taken by the licensee.</p> <p>Acknowledging the limited nature of access permitted because of the classified material controls, all available technology includes:</p> <ul style="list-style-type: none"> • Phones and email, including licensee bridge lines that may be set up for scheduled briefings. | <p>Use remote means to the maximum extent possible to assess reportable events (such as, Appendix A to Part 70, 70.50, 70.52, safeguards report, etc.) and determine need for on-site response.</p> <p>Regional management (branch chief) will authorize any on-site response for risk-significant events such as Emergency Response Organization (ERO) activation and/or declared emergencies.</p> <p>If onsite presence is authorized, respond to the site per IP 88135.02 and IP 88075.</p> <p>Practice social distancing when on site and follow site specific requirements for COVID 19.</p> | <p>Inspections will be evaluated for ability to complete objectives remotely or for deferral.</p> <p>NMSS and the regions will assess impacts to the baseline inspection program for all sites after the COVID-19 National Emergency subsides.</p> |