# PART 52, TECHNICAL SPECIFICATIONS REVIEW

PROGRAM APPLICABILITY: IMC 2504 B

## 71303-01 OBJECTIVES

When this inspection is performed, the majority of construction activities for the plant should have been completed, and the licensee is making preparations for initial fuel loading. The purpose of this procedure is to verify that the licensee has processes in-place to implement requirements of the plant's technical specifications (TS) and that the TS and TS Bases are consistent with the plant's current licensing basis, including the Final Safety Analysis Report (FSAR).

01.01 Verify that the controlled copies of the TS for use by plant operations and support staff contain the changes associated with all, including the latest, approved license amendments.

01.02 Verify that the licensee has plant procedures in place for assessing degraded or non-conforming conditions adverse to quality or safety (operability determination process).

01.03 Verify that the licensee has plant procedures in place for control of TS surveillance requirements (SR).

01.04 Verify that the licensee has plant procedures in place for the programmatic and reporting requirements of TS Sections 5.5 and 5.6, respectively, of Chapter 5.0, "Administrative Controls."

01.05 Verify that the licensee has plant procedures in place to maintain TS that are consistent with the current licensing basis. Specifically, there are procedures to identify TS implications of proposed plant design or procedure changes, there are procedures to update TS with changes approved in license amendments, and to verify that TS changes are supported by the updated FSAR~~)~~. The updated FSAR includes necessary changes associated with all approved plant design and procedure modifications, and license amendments that have been implemented since the FSAR was last submitted to the NRC in accordance with 10 CFR 50.71(e).

01.06 Verify that the licensee has plant procedures in place to maintain controlled copies of the TS Bases, which are for use by plant operations and support staff, that accurately describe and justify the current TS requirements, and that are consistent with the current licensing basis and the updated FSAR.

01.07 Verify that the licensee has plant procedures in place that are required by TS Section 5.4, "Procedures."

71303-02 INSPECTION REQUIREMENTS AND GUIDANCE

02.01 Requirement. The TS have been updated in accordance with approved license amendments.

References: 10 CFR 50.36, 10 CFR 50.36a, and 10 CFR 50.90, as delineated in 10 CFR 52.98, Section VIII.C.6 of the applicable 10 CFR Part 52 Appendix (certified designs).

Inspection Guidance:

a. Contact the NRC licensing project manager for the plant and obtain the approved TS-related license amendments for the plant since COL issuance and select at least six TS-related license amendments.

b. Perform a line by line check that the amendment sample from 02.01.a has been incorporated into licensee-controlled copies of TS in use by plant operations and support staff.

02.02 Requirement. The licensee's operability determination procedures are acceptable.

Reference: RIS 2005-020.

Inspection Guidance:

a. Review the licensee's controls to assess conditions related to equipment required to be operable by the TS. The process should include provisions for the assessment of the functional impact of the condition and evaluation of the condition when the functional impact is substantive.

b. Review the licensee's procedures for operability determinations on degraded and non-conforming equipment. The process should provide a basis to support the senior reactor operator operability decision.

c. Interview licensed operators to assess if they adequately understand their roles and responsibilities with respect to operability determinations. This should include actions to assess the functional impact of the condition and how to apply information provided in the TS bases.

d. Select several corrective action documents associated with TS equipment failures, or conditions, to determine if the failure or condition was addressed according to the licensee's procedures. If available, routine inspections in this area may be substituted to satisfy this inspection requirement.

02.03 Requirement. TS surveillances are being performed as required, and the licensee's procedures for control of SR are acceptable and in accordance with the provisions of SR 3.0.1, through 3.0.6 as applicable.

Reference: 10 CFR 50.36(c)(3)

Inspection Guidance:

a. Identify at least 10 SR in the TS that are required to be performed with fuel in the reactor vessel. Recommended sections are electrical, instrumentation, and refueling. Have the licensee provide the procedures used to meet the SR and document their results.

b. Request the latest documentation of the selected surveillance activities that have been performed.

c. Review the documentation obtained in 02.03.a and 02.03.b to verify that the specified SR have been met. Exceptions or deviations should be reviewed to ensure that TS requirements and definitions are met.

d. Review the licensee's procedures for control of the SR. The procedures should include provisions for control of surveillance frequency changes if the licensee adopts risk-informed TS Initiative 5, which allows relocation of specified frequencies from the TS into a Surveillance Frequency Control Program (SFCP) using the guidance in the Administrative Controls section of the TS.

e. Verify that the licensee has complied with plant procedures in place for control of the PRA for implementing an SFCP, as required by the approved methodology specified in TS administrative control Section 5.5, if the licensee has adopted an SFCP.

f. Verify that the licensee has complied with the approved instrumentation setpoint control methodology, and plant procedures in place for implementing a Setpoint Control Program (SCP) specified in TS administrative control Section 5.5, if the licensee has adopted an SCP.

02.04 Requirement. The licensee meets the programmatic and reporting requirements in TS Chapter 5.0.

Reference: 10 CFR 50.36, 10 CFR 50.36a, 10 CFR 50.55a.

Inspection Guidance:

a. Review the programmatic requirements in TS Section 5.5. Review a sample of four programs for site implementing procedures and actions to date. Assess whether the sampled programs are successfully meeting TS requirements.

b. Review the reporting requirements in TS Section 5.6, and select several required reports for review. Review the selected reports. Assess whether the reports are successfully meeting TS requirements.

c. Verify that the licensee has plant procedures in place for developing an adequate PRA for implementing Risk Managed Technical Specifications (RMTS) encompassing risk-informed completion times for required actions (i.e., a Risk Informed Completion Time Program (RICTP) and an SFCP as required by the approved methodologies specified in TS administrative control Section 5.5, if the licensee has adopted RMTS.

d. Verify that the licensee has complied with plant procedures in place for implementing RMTS as required by the approved methodologies specified in TS administrative control Section 5.5, if the licensee has adopted RMTS and/or an SFCP.

02.05 Requirement. TS are managed with respect to engineering changes.

References: 10 CFR 50.90, 10 CFR 50.59, 10 CFR 50.34, 10 CFR 52.98.

Inspection Guidance:

a. Review the plant's 10 CFR 52.98 and 10 CFR 50.59 change processes to assure that they contain controls to identify plant design and procedure changes that have TS implications. These controls should prevent plant changes from being implemented prior to NRC approval of any needed TS changes.

b. Verify that the licensee has procedures to revise the FSAR to support TS-related license amendments.

c. Contact the NRC licensing project manager for the plant and obtain a listing of the implemented modifications to the plant's design and procedures, which were made without NRC prior approval in accordance with 10 CFR 50.59 or 10 CFR 52.98, from the previous 24 months (or older if necessary to obtain an adequate sample size). Select at least six such implemented design modifications and at least six such procedure modifications for review.

d. Verify that the modification samples of 02.05.c did not require changes to the TS or prior NRC approval in accordance with 10 CFR 50.59 or 10 CFR 52.98.

02.06 Requirement. TS Bases in use by the licensee's operations and support staff for the plant are consistent with implemented TS-related license amendments, and implemented modifications to the plant's design and procedures as described in the updated FSAR.

References: 10 CFR 50.90, 10 CFR 50.59, 10 CFR 50.71.e, 10 CFR 50.36(a)(1), 10 CFR 52.98

Inspection Guidance:

a. Verify that licensee-controlled copies of TS Bases in use by plant operations and support staff are consistent with the TS changes made by the TS-related license amendments in the amendment sample from 02.01.a.

b. Verify that the modifications in the sample of 02.05.c did not require changes to the TS Bases that required prior NRC approval in accordance with 10 CFR 50.59 or 10 CFR 52.98.

c. Verify that changes to the TS Bases within the previous 12 months, which did not require prior NRC approval in accordance with the TS Bases Control Program in TS Section 5.5, are consistent with the associated TS requirements and the updated FSAR.

## 71303-03 GENERAL INSPECTION GUIDANCE

The scope of the inspection should be focused on verifying that the currently approved version of the TS are properly updated, and that the licensee has processes and procedures for implementing the TS requirements.

Inspection procedures for other areas should be reviewed to determine if credit can be taken for inspections specified in this procedure. If results from other inspection procedures are used to meet the requirements of this procedure, reference them in the inspection report.

## 71303-04 RESOURCE ESTIMATES - 80 hours total

04.01 Initial Preparations. 16 hours.

a. Contact agency Project Manager (PM) for the licensee to determine status and revision of TS.

b. Obtain current TS and Bases from the licensee.

c. Request process documentation from the licensee.

d. Review requirements documentation and formulate specific inspection plan.

04.02 The TS are current and properly updated. 4 hrs.

04.03 The licensee has acceptable processes for managing the TS. 4 hours.

04.04 The licensee has an acceptable operability determination process. 16 hours.

04.05 The licensee has an acceptable process for control of TS surveillances. 16 hours.

04.06 The licensee meets selected programmatic and reporting requirements in TS Sections 5.5 and 5.6. 8 hrs.

04.07 Final write-up of the inspection procedure results. 16 hrs.

## 71303-05 REFERENCES

References are included in Section 71303-02.

## 71303-06 PROCEDURE COMPLETION

Recommended sample sizes are described as part of each inspection described in Section 2, Inspection Requirements and Guidance. For cases where the term several is used, the sample size is two to five items. If the recommended sample size is not available, state that in the inspection write-up and use the samples available. This inspection procedure can be considered complete when the inspections described in Section 2 have been completed and the inspection report has been issued.

END

Attachment:
Revision History for IP 71303

Attachment 1 - Revision History Sheet for IP 71303

| 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 | ML072280017<br>10/20/08<br>CN 08-029 | Initial issue to support inspections of operational programs described in IMC 2504, NON-ITAAC INSPECTIONS<br><br>Completed 4 year search of CNs and no commitments found. | N/A | ML073380022 |
| N/A | ML20174A071<br>07/08/20<br>CN 20-031 | Revision based on periodic review and update; reflects lessons learned from issuing plant-specific Combined Licenses, expanded references, and editorial corrections. | N/A | N/A |