

## RESIDENT INSPECTION PROGRAM PLANT STATUS ACTIVITIES

Effective Date: 01/01/2021

### PROGRAM APPLICABILITY: 2600C

#### 88135.02-01 INSPECTION OBJECTIVES

The objectives of this procedure are to provide requirements and guidance for maintaining an awareness of plant conditions on a routine basis in order to risk-inform the selection and implementation of the appropriate baseline inspection procedures.

#### 88135.02-02 GENERAL GUIDANCE

Resident inspectors have a specific responsibility, outside of inspection activities, to be aware of plant conditions on a routine basis. This inspection procedure provides inspection requirements and guidance regarding these plant status activities at Category I fuel cycle facilities.

Resident inspectors' knowledge of plant activities and status is important in the risk-informed inspection process for determining how to select and implement the appropriate inspection procedure attachment or other region-based core inspection procedure. Plant status activities should focus on being aware of emergent plant issues, potential adverse trends, current equipment problems, and ongoing activities, including their impact on plant risk. Based on the knowledge gained through the plant status review, the inspectors are expected to adjust their inspections so that they can inspect activities which are of higher risk-significance. Additionally, resident inspectors should periodically (once a quarter) conduct tours of security related areas and observe other safeguards functions like material control and accounting in order to identify any security-related issues which may warrant follow-up by region-based security inspectors.

The resident inspector should transition into the appropriate inspection procedure attachment or section within this procedure whenever their plant tour efforts (Section 03.01) shift from collecting status information to evaluating a potential inspection issue. Generally, the inspector should transition into the appropriate inspection procedure section or procedure attachment if the information collection activity will exceed about 0.5 hour for any single issue. Security-related issues identified during tours of the licensee facility should be referred to security specialists in the region for follow-up inspection(s), as appropriate.

#### 88135.02-03 INSPECTION REQUIREMENTS AND INSPECTION GUIDANCE

##### 03.01 Plant Tours.

- a. Inspection Requirement. On a routine basis, tour accessible areas of the plant.
- b. Inspection Guidance. While it is expected that the resident inspectors routinely tour accessible areas of the plant, it is not expected that every area listed throughout this procedure be inspected each week. -It is expected that each area will receive some level of attention **during** each quarterly inspection period. The frequency of the review effort for each area will be determined by the inspector based on current plant conditions and activities.- Inspectors should place the highest priority on areas that contain risk-significant or safety related equipment.

Tours should include both interior and exterior areas. The entire area of the facility used for processing licensed materials should be covered, but areas where the dominant safety risks at the facility are presented should be toured more frequently, in proportion to the safety risk. Facility tours need not be completed all at **once but** can be performed in a series of shorter tours of the facility conducted on a systematic basis, at different times, so safety-significant and safeguards-significant areas are covered with frequencies appropriate to their current safety or safeguards significance.

To the maximum extent practicable, accomplish the selective examination requirements of this procedure by direct observation of safety-significant activities and equipment, tours of the facility, interviews and discussions with licensee personnel, independent verification of safety system status and corrective actions, and review of facility records. In fulfilling these inspection requirements, the inspector needs to exercise care not to duplicate inspection activities or characteristics that are already outlined elsewhere. Instead, the inspector should focus on areas of the plant that other inspectors have not entered while performing their inspections on a weekly basis.

The inspector may also review the results of the licensee's direct observations when direct inspections are not possible, or if other factors such as personnel safety or radiation levels in the area to be inspected warrant use of the licensee's direct observations.

**The following provides specific areas and activities the resident inspectors should consider incorporating into their routine Plant Tour inspections.**

1. Determine whether operators and support personnel:
  - (a) Are adequately staffed for the tasks being performed;
  - (b) Are attentive in carrying out their assigned duties;
  - (c) Adhere to approved procedures, including normal, abnormal, alarm response, and emergency procedures for any ongoing activity;
  - (d) Are aware of nearby activities in progress that could influence safe operation of equipment; and
  - (e) Are able to understand why annunciators may be in an alarm condition, or why annunciators might have been removed from service.

When observing personnel look for signs of personnel fatigue or impaired individual alertness that could create a reasonable doubt that an individual is fit to safely and competently perform his or her duties. This applies to all personnel that are granted unescorted access to protected areas, and individuals that are required to physically report to the licensee's Emergency Operations Facility by licensee emergency plans and procedures.

2. Security Program measures or activities. Observe the following to determine whether they meet license requirements. Additional resident inspector guidance for observing security activities is contained in Enclosure 1 of memorandum titled "Revised Interim Guidance for Security Inspection by Resident Inspectors," dated October 3, 2008 (ML082100574).
  - (a) Security shift turnovers;
  - (b) Security officers on posts;
  - (c) Search equipment such as X-ray machines, metal detectors, and explosives detectors are operational;
  - (d) Security equipment testing and/or review of equipment testing results;
  - (e) General integrity of Protective Area (PA) Barriers and fences;
  - (f) Maintenance of the isolation zones around PA barriers;
  - (g) PA illumination levels;
  - (h) Intrusion detection systems;
  - (i) Alarm and communication systems security event response;
  - (j) Security logs for degraded conditions and compensatory measures;
  - (k) The addition of locks or other barriers to improve security that impedes the ability of operators to take actions included in emergency implementing procedures;
  - (l) Maintenance or construction activities that interfere with security barriers or intrusion detection devices;
  - (m) Temporary conditions warranting compensatory measures from either security or operations because the conditions differ significantly from plant or risk profiles assumed in either the operating or security procedures; and
  - (n) Changes in site layouts, ingress or egress routes, or security procedures that affect emergency preparedness in areas such as emergency response facility access, emergency preparedness equipment access, or site assembly;

- (o) Persons within the PA display proper photo identification badges, and those requiring escort are properly escorted;
- (p) Personnel and packages entering the PA at access portals are searched using appropriate search equipment;
- (q) Material Access Area (MAA) portals are controlled appropriately; and
- (r) Special Nuclear Material (SNM) and SNM-bearing containers are uniquely identified, and items of SNM, or containers of SNM-bearing materials removed from process have been made tamper-safe. Also confirm that potential substitution items for those containing licensed material are excluded from or explicitly controlled in processing and storage areas.

In observing security activities, and especially the addition or modification of security features, the inspector should consider and, as appropriate, question the licensee regarding possible safety/security interface issues. In particular, the inspector should look for changes that might adversely affect systems, structures, or operator actions credited in the license; integrated safety analysis (ISAs), items relied on for safety (IROFS), accident analysis, radiation protection, or other design bases functions.

Inspectors should take advantage of the presence of visiting regional inspectors, if necessary, to conduct independent U.S. Nuclear Regulatory Commission (NRC) tours of areas requiring two-person rule access.

3. Radiation protection controls within a contamination-controlled area. Observe the following to determine whether:
  - (a) Personnel within a radiation-controlled area are wearing personnel monitoring equipment, and if it is properly located on the body;
  - (b) Personnel are wearing required protective clothing;
  - (c) Individuals exiting contamination-controlled areas follow proper frisking methods;
  - (d) Work station postings are appropriate and in accordance with procedures;
  - (e) Radiation areas are properly posted;
  - (f) Whether randomly selected radiation protection instruments are operable. Select from portable instruments, area samplers and monitors, friskers, and counting equipment in use. Determine if calibration, source, and use checks meet program requirements.
  
4. Nuclear Criticality Safety (NCS) controls and bounding assumptions. Observe the following to determine whether:
  - (a) NCS procedures are available to operators and are located at or near work stations;

- (b) Station Limit Cards and posting limits meet license requirements, NCS analyses, and licensee procedures;
- (c) Signs and labels are posted on equipment, work stations, in work **area birdcages**, storage racks, and transfer containers as required; and
- (d) Unfavorable geometry containers are precluded from designated areas or have appropriate NCS controls placed on their use.

The resident inspectors are not expected to conduct in-depth review of NCS evaluations. Rather, they are to trace the assumptions and controls that are established by the licensee's department responsible for nuclear criticality safety in their NCS analyses and procedures, to the field to confirm that the other departments are **implementing** the designated controls. One purpose of this item is to conduct a performance-based check on the adequacy of communications between the NCS-responsible department and the other departments. Potential discrepancies should be brought to the attention of the NCS-responsible department for prompt resolution.

- 5. **Environmental Monitoring Program.** Observe and review the results for the implementation of the environmental monitoring program. Specifically:
  - (a) Sampling activities; and
  - (b) Liquid and Gaseous Effluent Measurements. **If any action levels were exceeded, evaluate the licensee's corrective actions.**
- 6. Observe the conduct of radioactive waste management activities.
- 7. Observe the conduct of transportation activities.
- 8. Review the adequacy of communications between supervisors and operators and determine whether supervisors are providing adequate oversight.
- 9. Evaluate the adequacy of the licensee's communications between various departments, their approaches to resolving issues, and the overall conduct of plant operations. Note the level of management awareness of problems, and management's participation and involvement in providing guidance and direction for problem resolution.
- 10. Evaluate the status of safety or risk-significant systems by observing the indicated parameters and equipment configuration indications on the control panels. If an off-normal condition or false annunciation signal exists, determine whether timely and appropriate actions are being taken to correct the situation.
- 11. Evaluate whether any adverse plant parameter trends exist, and whether the licensee is aware of the trends.
- 12. Determine, if operating with multiple, or repetitive unplanned system failures caused by degraded equipment conditions, that the **licensee is** assessing and

managing the risk associated with the conditions in accordance with the licensee's procedures, and that any issue associated with the degraded equipment condition becomes a part of the corrective action program.

13. Inspect required safety-related (or safeguards-related) instruments and equipment to determine operability.
14. Observe instrument and equipment use to determine if the instrumentation or equipment is being used appropriately, perfunctorily, or if it is being bypassed.
15. Review log books and plant trouble reports to obtain information concerning operating trends and activities, and to note any out-of-service safety systems.
16. Inspect tags on the control panels to determine how long they have been there, whether they are consistent with the tagout log, and what the impact is on plant safety. Where it is observed that out-of-service equipment is present, determine if compensatory measures are appropriate and adequate.
17. Review the licensee's jumper/bypass log to determine whether there are conflicts with license and procedure requirements, and confirm that safety evaluations have been performed, if required. Determine whether the licensee is actively pursuing corrective action for conditions requiring **jumpers and** confirm that jumpers/bypasses have been installed and removed properly. When the use of jumpers or lifted leads results in inoperability of IROFS or other safety or safeguards systems, determine whether appropriate compensatory actions have been implemented.
18. Determine the operability of sensors that are IROFS that provide input to alarms or actuators, observe the sensor's current calibration, and check that the required number of channels are operable. Examples include in-line monitors, safety-related valves with automatic actuations, negative pressure indicators, conductivity probes and indicators, and scales.
19. Determine whether staff adequately convey all necessary safety-related information concerning the status of plant systems to incoming staff during shift turnovers.
20. Determine whether general plant cleanliness and equipment conditions could hamper clear egress along established evacuation **paths or** increase the potential for accidents that could adversely affect control of nuclear material.
21. Determine whether there is a potential for missile hazards caused by improper or unauthorized handling or storage of portable gas cylinders that could cause unacceptable damage to equipment or stored nuclear material with safety significance.
22. Determine if there is unauthorized storage of flammable material or excessive fire loads, posing explosive or incendiary risks.
23. Determine if the storage of hazardous chemicals could affect control of licensed nuclear material.

24. Observe whether the designated emergency response facilities (ERFs) are readily available and maintained ready for emergency operations.
25. Review changes made to the facility and verify compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) 70.72.
26. Inspectors should be vigilant of ongoing work, temporary services, or any potential means that could result in actual or potential harsh environments in areas or locations that are not analyzed in the ISA. Such harsh environments could be created by the failure of non-safety systems (including piping), the improper alignment of ventilation systems, or by preexisting physical conditions. Temporary services, gaps, breaks in barriers or walls, inoperable doors, and ventilation are examples that provide a means for a potentially harsh environment into other areas.

### 03.02 Status Meetings.

- a. Inspection Requirement. On a routine basis, select and attend licensee meetings.
- b. Inspection Guidance. The purpose of attending status meetings is to gather information about overall site activities in order to determine what activities will be or are being conducted **so that inspection** resources **can** be appropriately focused on those activities with the higher safety significance.

These status meetings could include any of the following meetings; plan of the day, shift turnover, emergent work, work planning, equipment **prioritization**, configuration change management, safety review committee, and corrective action document review.

### 03.03 Record and Log Reviews.

- a. Inspection Requirement. On a routine basis, select and review a sampling of onsite records required to be maintained by **the license application and 10 CFR requirements.**
- b. Inspection Guidance.
  1. **Records.** Select and review a sampling of records in order to determine where to focus inspection resources. These records could include:
    - (a) Records of IROFS that have failed to perform their function upon demand;
    - (b) Records of management measures that have failed; **and**
    - (c) Records of IROFS that have degraded such that the performance requirements are not satisfied.

These records could include facility, line, operator, or shift supervisor logs or run-sheets where applicable as **log keeping** practices vary between facilities.

Records should identify the credited controls or management measure(s) that failed and the safety function affected, the date of discovery, date (or estimated date) of the failure, duration (or estimated duration) of the time that the item was unable to perform its function, any other affected IROFS or management measures and their safety functions, affected processes, cause of the failure, whether the failure was in the context of the performance requirements or upon demand or both, and any corrective or compensatory action that was taken. Part 70 records should be readily retrievable and inspectable.

Failures should be recorded at the time of discovery, and the record of that failure updated promptly upon the conclusion of each failure investigation of an IROFS or management measure. Verify compliance with 10 CFR Part 70.62(a)(3).

2. **Logs Reviews.** The inspector should cover the period beginning with the last time the log was reviewed. The intent of the log and record reviews is to:
  - (a) Obtain information to enable the inspector to remain cognizant of facility operations and problems;
  - (b) Detect significant changes and trends in performance;
  - (c) Identify safety-significant or safeguards-significant events or malfunctions reported in the logs;
  - (d) Ensure the licensee took proper compensatory and corrective actions and appropriately reported to licensee management or the NRC;
  - (e) Detect possible inadequate safety practices, including indications that prerequisites of administrative procedures may not have been satisfied before startup or shutdown;
  - (f) Identify problem areas for future follow-up;
  - (g) Determine whether records are being maintained and reviewed as required by the facility's administrative procedures;
  - (h) Assess the effectiveness of the communications provided by the logs and determine whether management is appropriately knowledgeable of problems identified in these logs;
  - (i) Determine whether selected required tests, surveillances, and surveys have been performed on schedule, including equipment operability surveillances, radiation protection surveys, and special samples or tests required as compensatory measures for equipment out of service;
  - (j) Determine whether the NRC Operations Center has been notified of any reportable events, as appropriate; and

- (k) Remain cognizant of maintenance work planned, underway, or completed; and integrate this information into inspection activities to determine proper system removal and restoration, compliance with tagging and isolation requirements, effectiveness of Quality Assurance (QA) and Quality Control (QC) functions and radiation protection practices, compliance with license conditions for equipment out of service, and effectiveness of the maintenance organization.

03.04 Posting of Notices.

- a. Inspection Requirement. Once a year, the inspector should determine whether required notices are posted in accordance with 10 CFR 19.11.
- b. Inspection Guidance. Verify that the licensee's responses were posted within two working days of their submittal to the NRC. Verify that required notices and the licensee's responses remained posted for at least five days or until corrective action for the violation is complete, whichever is later. These postings include, as applicable:
  - 1. Notices of Violation involving radiological work conditions;
  - 2. Proposed impositions of civil penalties; and/or
  - 3. NRC Orders;

NRC Orders are required to be posted by the licensee within two working days of receipt from the NRC.

03.05 Identification and Resolution of Problems.

- a. Inspection Requirement. On a routine basis, determine whether **the licensee is identifying** equipment, human performance, and program issues, **entering them into the corrective action program, and correcting the condition(s) as required by the license, procedure, and/or NRC requirements.**
- b. Inspection Guidance. This review can be accomplished by attending daily corrective action program review board meetings, reviewing computerized corrective action program entries, or reading hard copies of corrective action program documents.
  - 1. Screen each item entered in the corrective action program to select the best samples for follow-up. The intent of this review is to alert inspectors to conditions such as repetitive, long-term, or latent equipment failures, adverse performance trends, risk-significant or repetitive equipment failures, or crosscutting components that might warrant additional follow-up. For selected **samples**, determine whether the licensee has:
    - (a) Taken appropriate corrective actions commensurate with the safety significance;
    - (b) Implemented appropriate compensatory measures (to be maintained until the corrective actions are completed);

- (c) Adequately determined the root cause(s) of the problem;
  - (d) Adequately evaluated the extent of the condition;
  - (e) Identified appropriate short-term and long-term corrective actions;
  - (f) Scheduled completion of the corrective actions, and implementation of the corrective actions are on schedule;
  - (g) Evaluated the problem to determine the applicable reporting requirements;
  - (h) Engaged the appropriate level(s) of plant management; and/or
  - (i) Notified the NRC (if required).
2. Determine if the licensee is tracking and trending deficiencies.
  3. Review a sample of closed issues to verify that the short-term and long-term corrective actions were adequate in preventing reoccurrence, **as required by the license application.**

Use direct observation of operations, discussions with relevant plant staff, and a sample review of applicable documentation as necessary. Consider licensee-identified issues (e.g., issues identified during audits or self-assessments) and issues identified through an employee concerns program, if applicable.

Use the guidance in IP 71152, "Problem Identification & Review," Section 03.04 as an aid in reviewing selected samples. Licensees with an approved CAP will have their corrective action program inspected in accordance with IP 88161, "Corrective Action Program (CAP) Implementation at Fuel Cycle Facilities." Corrective actions as a result of violations will be inspected in accordance with IP 92702, "Followup on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, And Alternative Dispute Resolution Confirmatory Orders."

### 03.06 Event Review.

- a. Inspection Requirement. Review any events that occurred and determine if the event warrants the use of formal event review criteria.
- b. Inspection Guidance. Determine whether the licensee has implemented a program of review to evaluate safety-significant events, and that it meets the conditions of the license. Event reviews should consider:
  1. The promptness of the licensee's review and evaluation;
  2. An evaluation of the extent of condition; and
  3. Assurance that related corrective actions have been completed.

For event notifications (EN) that were subsequently withdrawn by the licensee verify the appropriateness of the licensee's evaluation and assumptions supporting the withdrawal. IP 88075, "Event Follow-Up," provides additional guidance to consider when reviewing and evaluating events.

### 03.07 Audits.

- a. Inspection Requirement. Review a sample of internal and external audits performed since the previous inspection, and determine whether they have been performed in accordance with implementing procedures and license requirements.

Inspection Guidance. Self-assessment organizations act in a measurement and advisory capacity, monitoring the overall performance of the facility; identifying substandard performance and precursors to potentially more serious problems. They should be reporting findings and assessment results in an understandable form, and in a timely fashion, to a sufficiently high level of line management with authority to effect corrective action. An effective self-assessment organization is technically proficient and performance-oriented, aiming to

1. Examine the records documenting the audit to determine whether there was a written plan for the audit.
2. Confirm that the audit was reviewed by an appropriate level of licensee management.
3. Confirm that deficiencies and weaknesses were identified and entered into the corrective action program.
4. Confirm that safety-significant audit findings are being tracked through completion by the corrective action program, if required.
5. Determine whether the corrective actions were appropriate.
6. Determine whether management reviewed the corrective actions for effectiveness.

The inspector may determine by interviewing licensee staff, how the licensee ensures the effectiveness of audits, such as by use of contractor audits, use of a secondary (or follow-up) audit system on a periodic basis, or audits conducted by a member of management or a senior technician not directly responsible for the system audited.

### 03.08 Procedures.

- a. Inspection Requirement. Select one or more safety-significant operation procedures (i.e. used to process licensed material) or system operating procedures that have been newly developed or recently revised and confirm that the procedure development and revision process was followed for any safety-significant changes.
- b. Inspection Guidance. Select operating procedures for systems or processes that have not been operated for an extended period. Also, consider procedures that implement applicable IROFSs and/or management measures programs to ensure that

commitments specified in the licensee application are adequately flowed down into procedures. Evaluate the following aspects:

1. Procedures in use are current and approved by authorized individuals;
2. Personnel affected by a procedure are adequately and timely informed of changes in the procedure;
3. Verify that the licensee has conducted training or retraining on the procedures prior to implementation. Review a sampling of operator training records for specific changes. Consider whether the training is accomplished by reading and signing procedure revisions or by other forms of training such as classroom, briefings, and toolbox meetings. Determine whether the training is effective in addressing the change;
4. Changes to procedures, other than editorial and typographical, conformed with the ISA and had an engineering basis; and/or
5. Previously approved field changes were incorporated into the changed procedure within an established time period.

#### 03.09 Radiation Work Permit (RWP).

- a. Inspection Requirement. Review an active RWP each quarter and determine whether the RWP contains the information required by the licensee's radiation protection program and procedures.
- b. Inspection Guidance. Select one active RWP each quarter. A different RWP should be evaluated each quarter.
  1. Determine whether the RWP contains the information required by the licensee's procedures. Depending upon license requirements, the RWP should contain some or all of the following elements:
    - (a) Job description;
    - (b) Radiation levels;
    - (c) Dosimetry;
    - (d) Contamination levels – fixed and loose;
    - (e) Protective clothing and equipment required;
    - (f) General area airborne radioactivity concentrations – actual or anticipated;
    - (g) Respiratory protective equipment required;
    - (h) Special tools and equipment needed;
    - (i) Special instructions;

- (j) Health physics coverage;
  - (k) Expiration; and
  - (l) Signatures.
2. Determine whether the prescribed controls and precautions are being adequately implemented.
  3. Confirm that the RWP is prominently posted or otherwise readily available for employees to review and observe.

### 03.10 Annual Security and Emergency Preparedness Drills/Exercises

- a. Inspection Requirement. Once per year, observe the licensee's performance during each of the following:
  1. Emergency preparedness (EP) exercise/training evolution.
  2. Security Force-on-Force (FOF) tactical response exercise.
- b. Inspection Guidance.
  1. EP exercise: 10 CFR 70.22(i)(3), describes the basic elements of the EP program. The requirements for EP exercises are found in 10 CFR 70.22(i)(3)(xii) and the licensee's approved emergency plan. EP program requirements include an element of training. An exercise is a performance evaluation of the effectiveness of training. Additionally, the licensee must conduct post-exercise critiques that evaluate the overall effectiveness of the exercise response and must correct identified deficiencies.
    - (a) Observe one or more key portions of an EP exercise/drill including, command and control, accident assessment and event classification, dose assessment, protective action recommendations, and notification and communication onsite and offsite. If the drill is being evaluated by a regional inspection team (normally during the biennial drill), to the extent possible, observe portions of the drill not covered by the inspection team.
    - (b) Prior to the exercise, review a sample of corrective actions for deficiencies and/or weakness identified during previous exercises and evaluate, during observation of the drill, the effectiveness of corrective actions taken.
    - (c) Observe the post-exercise critique(s) and determine whether evaluators, controllers, and players participate in critiques immediately after the exercise while the details are fresh, and whether comments are detailed and provide a critical assessment of the response including areas for improvement. The critique shall evaluate the appropriateness of the emergency plan, facilities, equipment, personnel, training, and overall effectiveness of the emergency organization.

- (d) Verify that deficiencies identified during the critique process are captured and tracked to resolution in the licensee's corrective action program.
  - (e) Additional guidance for evaluating performance of EP exercises is provided in IP88051, "Evaluation of Exercises and Drills."
2. Security FOF Exercise: 10 CFR 73.46(b)(9) describes the requirements for the conduct of FOF exercises in order to demonstrate the overall security system effectiveness, the ability of the security force to perform response and contingency plan responsibilities and to demonstrate individual skills in assigned team duties.
- (a) Conduct a general observation of pre-drill/exercise brief, objectives, and safety precautions.
  - (b) Conduct a general observation of the exercise on command and control and objectives. Consider observing from a strategic position/location within the protected area of the site that will enable the observation of a portion of the actions to be conducted during the exercise. If exercise performance is being evaluated by regional inspector(s) to the extent possible, observe the exercise from a location that is different from the regional inspector(s) and that enhances the overall inspectors' assessment of the exercise.  
  
If possible, request the use of licensee-issued controller communication device and personal hearing apparatus (i.e., security radio with ear piece) set to the frequency specified for exercise controllers.  
  
Upon moving to and arriving at the observation location, the inspector(s) should conceal themselves from the security force participating in the exercise to prevent disclosure of the adversary mission pathway.
  - (c) Conduct a general observation of the post-exercise critique(s) and verify that identified deficiencies of the onsite physical protection program and protective strategy are captured and tracked to resolution in the licensee's corrective action program.
  - (d) Additional resident inspector guidance for observing security FOF exercises is contained in Enclosure 1 of memorandum titled "Revised Interim Guidance for Security Inspection by Resident Inspectors," dated October 3, 2008 (ML082100574).

#### 88135.02-04 RESOURCE ESTIMATE

The annual resources to complete this inspection are estimated to be 578 hours. This estimate is only for direct inspection effort and does not include preparation for and documentation of the inspection. Time spent conducting plant status activities should be charged to IP 88135.02. Completion of plant status inspections will be documented in the quarterly inspection report for the quarter in which they were performed.

## 88135.02-05 PROCEDURE COMPLETION

This procedure is complete when all inspections requirements, including its sample size and frequency, as applicable (see below), are performed.

- 05.01 Plant Tours. There are no sample sizes associated with this section. There is no requirement for documenting activities specific to obtaining plant status.
- 05.02 Status Meetings. There are no sample sizes associated with this section. There is no requirement for documenting activities specific to attending status meetings.
- 05.03 Record and Log Reviews. There are no sample sizes associated with this section. However, if an inspector performs a more than cursory record review, it should be documented in the quarter in which it was performed.
- 05.04 Posting of Notices. There are no sample sizes associated with this section. There is no requirement for documenting this activity.
- 05.05 Identification and Resolution of Problems. There are no sample sizes associated with this section. Every effort should be made to screen all safety-related corrective program entries. There is no requirement to document this review. However, items determined to be more than minor in safety significance and under NRC purview shall be reviewed and documented.
- 05.06 Event Review. All events that require a written report to the Headquarters Operations Officer (HOO) should be documented in a quarterly report.
- 05.07 Audits. There are no sample sizes associated with this section. However, if an inspector performs an audit review, it should be documented in the quarter in which it was performed.
- 05.08 Procedures. There are no sample sizes associated with this section. However, if an inspector performs a more than cursory procedure review, it should be documented in the quarter in which it was performed.
- 05.09 Radiation Work Permit. The minimum sample size is recommended to consist of one review per quarter (–or four per year), as described in Section 03.09, and documented in the quarter in which it was performed.
- 05.10 Annual Exercise. The minimum sample size is recommended to consist of one observation of each of the listed activities per year, as described in Section 03.10, and documented in the quarter in which it occurred.

## 88135.02-06 REFERENCES

1. Manual Chapter 2600, Appendix C, “Fuel Cycle Resident Inspection Program”
2. NUREG/BR-0326, “NRC Inspector Field Observation Best Practices”
3. 10 CFR 70.62(a)(3), “Safety Program and Integrated Safety Analysis”

4. 10 CFR 70.72, "Facility Changes and Change Process"
5. 10 CFR 19.11, "Posting of Notices to Workers"
6. Regulatory Guide 3.3, "Quality Assurance Program for Fuel Reprocessing Plants and for Plutonium Processing and Fuel Facilities Plants," Revision 1, March 1974
7. Regulatory Guide 3.10, "Liquid Waste Treatment System Design Guide for Plutonium Processing and Fuel Fabrication Plants," June 1973
8. Regulatory Guide 3.71, "Nuclear Criticality Safety Standards for Fuels and Material Facilities," Revision 1, October 2005
9. Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection," Revision 1, October 1999
10. Regulatory Guide 8.21, "Health Physics Surveys for Byproduct Material at NRC-Licensed Processing and Manufacturing Plants," Revision 1, October 1979
11. Regulatory Guide 8.25, "Air Sampling in the Workplace," Revision 1, June 1992
12. Regulatory Guide 8.29, "Instruction Concerning Risks from Occupational Radiation Exposure," Revision 1, February 1996

END

Attachment:  
Revision History for IP 88135.02

Attachment 1 – Revision History for IP 88135.02

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 (Pre-Decisional, Non-Public Information)
N/A	ML13233A171 01/23/14 CN 14-003	Initial issuance - new document, based on an entire revision of IP 88135.	N/A	ML13354B887
N/A	ML15042A273 05/21/15 CN 15-010	Added item 27 to 88135.02-02, Inspection Requirements and Inspection Guidance, 02.01 Plant Tours, Item b. Inspection Guidance. Addition was made base on a recommendation from the Reactor Oversight Process Feedback process.	N/A	ML15042A278
N/A	ML20302A470 12/02/20 CN 20-067	Revision to implement the recommendations from the Smarter Inspection Program (ML20077L247 and ML20073G659) and to add annual inspection of EP and security exercises from base IP 88135.	Completed by December 2020	N/A