

# FOF Inspection Program Plan for CY 2022

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# CY 2022 FOF Inspection Plan

- NSIR plans to implement the full Inspection Procedure (IP) 71130.03 for CY2022.
  - The current procedure would be used without Addendum 5
  - Some efficiencies gained in 2021 would be retained
  - Intent is to complete nominal baseline inspection samples
- This approach is consistent with other NRC inspection programs
  - NRR and NMSS have issued memos updating inspections.
    - ML21295A302 and ML21294A278
  - "Based on current conditions in country, the facilities and the workspaces are in a safe condition to support full implementation."

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# CY 2022 FOF Inspection Plan

- The full IP 71130.03 can be implemented provided the licensee can safely conduct the exercises
  - Addendum 5 to IP 71130.03 states “When the PHE has ended, in accordance with federal guidelines, and/or the licensee can safely perform two exercises, this addendum will no longer be used.”
- Licensees will need to justify why they are not able to conduct two exercises safely.
  - 30-day and 14-day check-ins will continue
  - Justification on not being able to conduct the exercises safely will be communicated through the inspection Team Leader (follow path as outlined in TSG)

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# CY 2022 FOF Inspection Plan

- Considerations impacting the ability to conduct exercises safely:
  - On-site COVID conditions and trends
    - For low to moderate transmission rates per CDC
      - Full 71130.03 inspection would be expected
    - For substantial to high transmission rates per CDC, the following could be considered:
      - Impact on ability to post appropriate exercise players
      - Impact on ability to get controllers required for exercises

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# Tiered Approach

- Primary objective to conduct two full FOF exercises
  - A tiered approach will be applied if the licensee cannot conduct the full IP 71130.03.
- Secondary approach - conduct IP 71130.03 with Addendum 5
  - One exercise with COVID mitigation criteria.
- Inspection would transition to IP 92707 based on approved hardship request as stated in TSG.
  - Process not changed from 2021

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# Hardship Criteria for transition to IP92707

1. significant number of site-security personnel are positive or under quarantine due to COVID-19 impacts, which places an unreasonable burden on the licensee's ability to staff positions required for conduct of IP 71130.03;
2. the inspection dates conflict with safety-related and/or emergent work that was rescheduled due to COVID-19;
3. the inspection dates conflict with an outage that was rescheduled due to COVID-19;
4. positivity rates in area surrounding site make travel to the site a greater risk to licensee individuals needed to support the inspection of IP 71130.03; or
5. due to site protocols for COVID-19 mitigation measures, use of certain positions (e.g., bullet-resistant enclosures (BREs), central alarm station (CAS), secondary alarm station (SAS)) are restricted, which will pose an unreasonable burden on licensee or make it unlikely for overall outcome of exercises to be characterized (team lead will provide recommendation to branch chief for consideration for hardship).

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# Background Slides



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# TSG Section 3.1 General Overview and Guidance

*Based on an evaluation of the options to conduct FOF exercises during the COVID-19 PHE, staff plans to use the existing IP 71130.03 framework with COVID-19 mitigation protocols (included as Addendum 5 to the IP) as its primary approach, and to use IP 92707 when hardship conditions do not permit use of IP 71130.03.*

*The IP 71130.03 framework is preferred, when site-specific conditions permit, because it provides a holistic assessment of performance, involves proven methods for mitigating conflicts of interest, and is a well-established framework. However, in some cases, site-specific conditions due to COVID-19 impacts on staffing and circumstances such as scheduling conflicts related to execution of critical safety activities and other conditions pertaining to COVID-19 may necessitate use of the revised IP 92707.*

# Updated Flowchart

