INSPECTION MANUAL CHAPTER 2600 APPENDIX C

FUEL CYCLE RESIDENT INSPECTION PROGRAM

Effective Date: 06/26/2025

2600C-01 GENERAL POLICY

Resident inspectors are assigned to the Highly Enriched Uranium 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, and Safety Analysis Reports, 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, 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 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. For sites nominally staffed with only a single qualified resident inspector, at least one qualified resident inspector or an alternate qualified inspector (e.g., a region-based inspector) should provide site coverage during normal working hours (i.e., Monday through Friday) such that there are no more than 10 consecutive normal workdays in which there is no coverage. In addition, in some circumstances as approved by regional management, NRC staff such as technical reviewers may provide NRC site coverage after a review of site event notifications, emergency response procedures, and the NRC resident inspector's role.

   The resident inspector coverage policy provides flexibility for the Region, based on the facility's risk, performance, and core inspection program completion status, to plan supplemental staffing resources and reduce the amount of travel needed to maintain staffing. This should reduce travel hours up to 8-10 hours per roundtrip resulting in savings to Title 10 of the *Code of Federal Regulations* Part 170 fees.

   In extenuating circumstances, the Region may request an extension of the 10 consecutive working days by contacting the program office via a memo to the Division of Fuel Management division director. The memo should explain the circumstances that caused the request, why safety continues to be assured, when site coverage is expected to be restored, and any contingency plans considered.

b. The Regional Administrator will be notified when the site inspector coverage cannot 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 3 months of turnover time with the incumbent resident inspector but shall not exceed 6 months without approval of the Regional Administrator. Three months is not intended to act as a minimum, only to establish a nominal band. NRC recognizes

that a period of turn-over is beneficial and will make all reasonable efforts to ensure adequate turn-over time is provided, when available (e.g., when the outgoing senior resident inspector's separation from their work unit or the agency provides a sufficient lead time to make turn-over possible). The turn-over period described in this appendix is guidance and is part of management's consideration of whether a Senior Resident Inspector (SRI) is ready to perform duties independently. The specific amount of time available for turnover can vary substantially, depending upon the nature of the outgoing SRI's departure. In many cases, it is unrealistic and impractical to have an extended time for outgoing and incoming SRIs to turn over (i.e., unexpected attrition, transfers that occur quickly, or sudden departure of staff). When staff departures occur, management will take the actions necessary to ensure reasonable assurance of safety and site coverage. This may include sending other fuels-qualified inspectors to the site and/or an assessment by management that the prior experience and qualification of the incumbent permit them to perform full-scope, independent inspections.

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 7-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 4 years after relocating unless specifically approved by the DEDMRT based on identified agency needs.

END

List of Attachments:

Attachment 1: Revision History for IMC 2600, Appendix C

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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
N/A	ML15058A260 09/24/15 CN 15-018	Delete reference to Gaseous Diffusion Plants and certificates. Removed Resident Inspector Coverage for Sites with two resident inspectors. Removed guidance for one weekend inspection per month. 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).	None	ML15058A244

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	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
N/A	ML25092A123 06/26/25 CN 25-021	Extended time without coverage from 6 to 10 consecutive working days to implement the ADVANCE Act; and clarified wording.	None	N/A