
INSPECTION MANUAL CHAPTER 2515 APPENDIX D

PLANT STATUS

Effective Date: 07/01/2026

2515D-01 PURPOSE

Resident inspectors (RIs) have a specific responsibility, outside of direct inspection activities, to be aware of plant conditions on a routine basis. This appendix provides guidance regarding these plant status activities at light water reactors in the operations phase.

2515D-02 OBJECTIVES

- 02.01 To ensure that inspectors are routinely aware of emergent plant issues, potential adverse trends, current equipment problems, and ongoing activities, including their impact on plant risk.
- 02.02 To monitor security-related systems, structures, and components (SSCs).
- 02.03 To monitor the licensee's management of fatigue under 10 CFR 26, "Fitness for Duty Programs."
- 02.04 To conduct the routine review of licensee's problem identification and resolution (PI&R).
- 02.05 To provide guidance on when to transition to direct inspection activities.

2515D-03 APPLICABILITY

See Section 2515-03 of Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program – Operations Phase."

2515D-04 RESPONSIBILITIES AND AUTHORITIES

See Section 2515-05 of IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase."

2515D-05 REQUIREMENTS

See Section 2515-11 of IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase."

06.01 Transition to Baseline Inspection

RIs should transition into the appropriate inspection procedure whenever their effort shifts from collecting status information to evaluating a potential inspection issue. Specific issues identified during tours of the licensee facility can be referred to regional specialists for follow-up inspection(s) as appropriate. The inspector should transition into the appropriate inspection procedure if the information collection activity will exceed about 1/2 hour for any single issue. Scope of activities conducted under the Plant Status procedure does not require documentation in inspection reports.

06.02 Performance Indicator (PI) Verification

The monitoring of plant performance primarily relies on information provided by PIs and inspection findings in areas not measured, or not adequately measured, by PIs. PIs, together with risk-informed baseline inspections, are intended to provide a broad sample of data to assess licensee performance in the risk-significant areas of each cornerstone. The purpose of PI verification is to independently verify the accuracy and completeness of PI data submitted to the NRC. PI data submissions are voluntary, but the information provided must be complete and accurate in all material respects subject to 10 CFR 50.9. PI verification includes periodic inspections during which an inspector will review a sample of plant records and data against the reported PIs. The specific PIs are listed in IP 71151 (reference use only) as well as guidance associated with the review of PI data. In addition, inspectors may refer to NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," during the review of PI data, which describes the PIs, how they are calculated, and how and when to report PIs to the NRC.

Inspectors should perform periodic verification of Reactor Safety PIs (Initiating Events, Mitigating Systems, and Barrier Integrity) when a plant issue occurs that may affect licensee PI data. For example, if the plant has experienced an unplanned downpower >20 percent (IE03), inspectors may verify the event has been reported in PI data. In addition, an inspector may verify that the licensee accurately reports RCS leak rate (BI02) PI data when the licensee experiences increased RCS leak rates. Inspectors can also determine how many safety system functional failures (SSFFs) were reported in accordance with 10 CFR 50.73(a)(2)(v) and compare with the number of SSFFs reported in the PI (MS05). For the full list of Reactor Safety PIs that can be reviewed and their bases, refer to IP 71151 and IMC 0308 Att 1. Emergency Preparedness, Public and Occupational Radiation Safety, and Security PIs will be verified in the associated inspection programs.

If a PI discrepancy is identified, inspectors should follow the guidance in IP 71151 section 03.12 for follow-up and disposition. If the discrepancy results in the PI exceeding a threshold or affects the ROP Action Matrix Column, the inspector should notify regional management to determine what further action is required. The inspector and regional management should review the entrance criteria in IP 71150, "Discrepant or Unreported Performance Indicator Data." For unreported PIs, the inspector and regional management should also consider performing IP 71150.

06.03 Control Room Walkdown

The purpose of the control room walkdown is to help enable the inspector to stay current of plant status as well as to identify unexpected plant conditions that warrant additional inspection under the baseline inspection program.

See Inspection Procedure (IP) 71153, "Event Follow-up," appendix B, for guidance on NRC inspector conduct while in the control room during events in order to preclude NRC intrusion in licensee response activities.

Examples of items for which inspectors should identify during control room walkdowns may include:

- a. Look for system components that are in unexpected configurations or parameters that are at unexpected values based on the operational mode of the plant
- b. Identify any alarming or locked-in annunciator conditions.
- c. As available, discuss plant status with control room operators.
- d. Note whether any adverse plant parameter trends exist (e.g., unidentified and identified leakage, RCP seals, SRV tailpipe temperatures, etc.); determine whether the licensee is aware of the trends.
- e. Identify the major plant schedule items for the day. Note whether the plant risk model reflects the current plant configuration. Transition to IP 71111.13, "Maintenance Risk Assessments and Emergent Work Control," as appropriate.
- f. Identify whether the plant is in any technical specification (TS) limiting conditions for operation (LCOs), whether the TS action statements are being met, and those TS requirements and license conditions are being met.
- g. Determine if the licensee is operating with multiple, repetitive, or unplanned TS action statement entries caused by degraded equipment conditions; that they are assessing and managing the risk associated with this condition in accordance with licensees' procedures; and that the issue associated with the degraded equipment conditions is entered into the corrective action process.
- h. Determine if the licensee is operating within licensed power levels. Guidance for evaluating brief power level fluctuations above 100% is given in NRC Regulatory Issue Summary (RIS) 2007-21, "Adherence to Licensed Power Limits," Revision 1 (ML090220365).
- i. Any radiation dose implications associated with repetitive tasks should be reviewed by applicable radiation safety baseline IPs. In the control room or other appropriate locations, review visible portions of radiation monitors or other indications that could provide indication of an apparent uncontrolled release.
- j. Observe equipment and / or operator actions for open phase condition monitoring as specified by licensee commitments or NRC requirements. Additional guidance for open phase condition monitoring exists in IP 71111.04, "Equipment Alignment."

- k. Maintain awareness of the local weather forecast and any impacts on plant configuration and operation. Transition to IP 71111.01, "Adverse Weather Protection," as appropriate.

Review control room logs, equipment out-of-service or clearance logs, compensatory action logs, TS logs, chemistry logs, standing orders, and night orders several times each week to become aware of potential risk-related problems that occurred since the previous review. Licensees may refer to compensatory actions as Operator Work Arounds, Operator Burdens, etc. Determine whether the logs appropriately reflect the plant status observed during the control board walkdown and whether TS requirements are being met. A review of the operator shift logs and standing orders may provide insights regarding equipment operability. Pursue any operability or functionality concerns using IP 71111.15, "Operability Determinations and Functionality Assessments."

Ensure that the licensee properly monitors for Reactor Coolant System (RCS) pressure boundary leakage or unidentified leakage that has the potential to exceed TS limits including monitoring and trending unidentified leakage rates; particularly changes in unidentified leakages, but also monitors other containment parameters such as containment sump in-leakage rates, the containment air/gaseous radiation monitor indication, the containment particulate radiation monitor indication, and the containment humidity indication to validate potential RCS leakage trends. If inspectors note heightened leakage trends and/or other leakage indications, ensure the licensee is taking appropriate actions to identify and isolate or mitigate the source of the leakage as required. If RCS leakage is confirmed and headquarters support is necessitated, RIs may notify the appropriate NRR technical branches via the project branch chief and the NRR project manager. Resident inspectors should provide periodic updates on the RCS leak rate and on the status of licensee's actions to their regional branch chief.

Report primary-to-secondary leakage in steam generators greater than three gallons per day to NRC headquarters staff. For additional information on the reporting guidance, see Section 07.05 of IMC 0327, "Steam Generator Tube Primary-To-Secondary Leakage."

If the licensee documents waivers of work-hour controls in the control room logs or shift manager logs, then periodically review the waiver(s) to determine that the granting of the waiver(s) addressed circumstances that could not have been reasonably controlled. If further inspection guidance is needed then IP 93002, "Managing Fatigue," may be referenced on an "as needed" basis.

06.04 Status Meetings

Select and attend licensee meetings, on a routine basis, that provide an overall status of the plant and pertinent ongoing activities. These meetings could include the licensee's plan of the day meeting, shift turnover meeting, emergent work meeting, equipment prioritization meeting, and PI&R document review meetings. Note that during or in preparation phases of the plant refueling or maintenance outages, licensees may conduct additional meetings and staff additional information centers such as the outage control center. Inspectors should attend these meetings to understand the scope, schedule, and risk-significant activities of these outages. This will enable the inspectors to plan and implement applicable baseline inspection procedures that needed an outage.

The purpose of attending the 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 risk significance.

06.05 Plant Tours

On a regular basis, tour accessible areas of the plant containing risk-significant SSCs, and areas that contain significant radiological hazards, and areas with important security SSCs. Focus on areas of the plant that inspectors have not entered while performing other inspections. The frequency of the plant status review effort should be risk informed and determined by the inspector based on current plant conditions and activities. Inspectors should use plant-specific risk information to determine what SSCs and activities are of higher risk significance given the present plant configuration.

Inspectors should coordinate with the licensee to tour normally inaccessible areas when they become accessible to assess the material condition and status of SSCs. While some areas not normally accessible might be obvious such as heater bays in BWRs, other areas may take additional effort to identify and plan for a tour (such as essential service water, radwaste vaults, and outdoor underground vaults that contain risk-significant SSCs). The inspectors should review and discuss areas not normally accessible with the licensee to ensure the inspectors are aware of their existence (some areas may not be obvious) and plan logistics such as ensuring advance notification of when they will be accessible, if appropriate, and any special arrangements needed for entry (i.e., special training for fall protection or confined space entry). The inspectors can also review the results of licensee's direct observations (video movies, and digital photographs) when direct inspections by inspectors were not possible or if other factors such as personnel safety or the radiation levels in the area to be inspected warrant use of licensee's direct observations. It is not the intent of this guidance to force licensees to make every not normally accessible area of the plant accessible for NRC inspection or to place RIs in harm's way unnecessarily.

During changing plant conditions (plant refueling or maintenance outages), the frequency and scope of plant status tours may be increased to tour areas not normally accessible and to observe material condition and equipment in an abnormal lineup.

It is important that inspectors maintain awareness of situations that may result in increased fatigue (i.e., unit outages, short duration LCOs, staff shortages, etc.). When evidence of fatigue is identified, inspectors should immediately notify licensee management of any observed condition that indicates signs of fatigue so they can evaluate the need for a fatigue assessment per 10 CFR 26.211, "Fatigue Assessments." Additionally, the inspector should be aware that work-hour controls may change with a unit in an outage and an increase in the use of waivers, self-declarations, or fatigue assessments may occur. Refer to IP 71111.20, "Refueling and Other Outage Activities," for further guidance on fatigue inspection during outages.

Plant tours should occasionally include on- and off-site emergency response facilities, independent spent fuel storage facilities, and storage locations for equipment used for diverse and flexible mitigation strategies (FLEX). In addition, the inspector may accompany a plant operator performing equipment rounds to gain insights regarding undocumented plant deficiencies, work arounds, or temporary modifications.

The purpose of the tours is to provide an independent evaluation of ongoing plant activities that may affect plant performance in the cornerstones. In performing the tours,

the inspector should keep in mind the integrated effect of plant problems on plant safety. Areas to note may include:

- a. Plant activities taking place that may affect the operability of the required SSCs and/or increase plant risk including on-line (pre-outage) maintenance activities, such as the erection of temporary scaffolding, the installation of temporary services, and/or placement of other structures or material that may interfere with the safety-related function of SSCs.
- b. The overall status of plant SSCs, including general material condition or the installation of unauthorized modifications that could affect the SSC's function. Pursue any unauthorized or temporary modification deficiencies using IP 71111.04, "Equipment Alignment," or other applicable IPs.

A degraded condition is one in which the qualification of an SSC or its functional capability is reduced. Examples of degraded conditions are failures, malfunctions, deficiencies, deviations, and defective material and equipment. Examples of conditions that can reduce the capability of a system are aging, erosion, improper operation, and inadequate maintenance.

Obvious signs of degraded material condition of piping or other components, such as substantial corrosion, loose anchor bolts, leakage, standing water accumulation, cable insulation cracked or charred, or other conditions, may call into question operability or design margins of the equipment.

Signs of aging management concerns with active and/or passive SSCs. Licensees in their extended period of operation have aging management programs (AMPs) with additional guidance for monitoring of these SSCs.

Inspectors should ensure that identified material condition deficiencies are captured in the licensee's PI&R program. Inspectors should consult with appropriate regional and headquarters specialists if there are any questions regarding the operability or adequate design margin associated with degraded SSCs. Inspectors should attempt to obtain video movies and/or digital photographs of the degraded equipment (either on their own or through the licensee) to assist the specialists in evaluating the degraded material condition. IMC 0620, "Inspection Documents and Records," contains guidance on the use of photographs or videos during the inspection process.

- c. Any deficient condition which may be indicative of equipment tampering. Inspectors should also evaluate whether licensees actively consider potential for tampering when equipment deficiencies are identified.
- d. Fire hazards that could increase risk, and overall status of fire protection equipment.
- e. Status of emergency response facilities (on-site and off-site).
- f. Plant activities which are taking place that may affect the security of the facility such as: 1) security shift turnovers; security officers on posts; 2) security equipment testing and/or review of equipment testing results; 3) security force drills or exercises; and 4) security logs for degraded conditions and compensatory measures. Transition to IP 71130.15, "Security Operations (Resident Inspector)," for inspection and guidance of security operations in response to plant activities.

- g. The status of doors to locked high radiation areas and required radiation postings. Consider referring concerns to regional HP inspectors for follow-up.
- h. Any leakage involving radioactive liquids or gases. Consider referring concerns to regional HP inspectors for follow-up.
- i. Status of remote or alternate shutdown panel areas, including locally required procedures, materials, or communications equipment needed to perform any required actions from these areas.
- j. Signs of personnel fatigue or impaired individual alertness which 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 nuclear power reactor protected areas and individuals that are required to physically report to the licensee's Technical Support Center or Emergency Operations Facility by licensee emergency plans and procedures.

06.06 Reactor Safety/Plant Security Interface

The maintenance of both plant security and safety requires coordination of activities to ensure that actions taken to address security concerns do not adversely affect safety, including emergency preparedness, and that maintenance, operations, or engineering activities do not introduce security concerns. Examples include:

- the addition of locks or other barriers to improve security that impedes the ability of operators to take actions included in emergency operating procedures
- maintenance or construction activity that interferes with security barriers or intrusion detection devices. **For example, removal of a hatch or floor plug between security zones, or the placement of construction equipment in the vicinity of a security barrier.**
- 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
- 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, site assembly, or staff augmentation times

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 SSCs or operator actions credited in:

- Traditional Licensing & Design Bases Functions (e.g., accident analysis, station black out, fire protection programs)
- Emergency Operating Procedures
- Severe Accident Management Guidelines
- FLEX Strategies
- Probabilistic Risk Assessments
- Radiation Protection Emergency Plan & Emergency Plan Implementing Procedures

In observing plant activities such as maintenance, operations, emergency preparedness, and engineering, 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:

- barriers and fences
- intrusion detection systems
- security response positions
- placement of temporary equipment or obstructions
- security response pathways
- alarm and communication systems security event response
- assumptions for and access to readily available equipment for responding to conditions described in each plant's mitigating strategies table
- modification to equipment relied on in the Emergency Action Level scheme
- changes to set points contained in the Emergency Action Level scheme

Inspectors should transition to IP 71130.15 for more in-depth reviews of security operations.

06.07 Construction and Decommissioning Activities Near Operating Units

Construction and decommissioning activities may occur in the vicinity of operating unit(s). These activities could include reactors, or other infrastructure projects that in any way could potentially impact operating units (e.g., gas pipelines, renewable energy projects, and hydrogen production facilities). Resident Inspectors assigned to operating unit(s) should be aware of such activities which may affect the operating unit(s)' safety systems. The impact of such activities on operating units will depend on multiple factors such as activity distance from the operating unit(s) and the number of shared SSCs between operating unit(s) and units under construction/decommissioning.

Construction activities for a nuclear power plant may not commence without a construction permit, limited work authorization, or combined license. Activities that are construction are defined by 10 CFR 50.10(a). An applicant may undertake a range of pre-construction activities without a construction permit, limited work authorization, or combined license as defined in 10 CFR 50.10(a)(2). Resident Inspectors should contact their regional management regarding any questionable activities to ensure unauthorized construction activities are not occurring and do not have an impact on risk significant SSCs.

The operating licensee will continue to have the responsibility for ensuring that any site activities do not impact risk significant SSCs to the operating unit(s) or Independent Spent Fuel Storage Installation (ISFSI). The operating licensees are required to consider the impacts on various aspects of operations, such as emergency planning, radiological protection, and demolition of existing facilities and structures. At multi-unit sites, a unit under construction is required, in part, to have managerial and administrative controls to provide assurance that the LCOs are not exceeded as a result of construction activities (10 CFR 52.79(a)(31)). The RIs should understand how construction issues, that may affect the operating unit, are communicated and dispositioned at the operating unit(s).

Resident Inspectors should be alert to situations with potential adverse impact (e.g., unit transients or reactor trips). Understanding potential adverse impacts from the pre-

construction, construction, and/or decommissioning activities should allow the inspector to implement the appropriate IP to evaluate the potential risk significant SSCs. Examples of how construction/decommissioning activities could adversely impact the operating unit(s) include, but are not limited to, the following:

1. effects on seismic monitoring from sheet piling installation or explosives used during excavation
2. damage to underground piping, electrical cables, fiber-optics, and telecommunications during excavation or movement of heavy loads
3. disruptions in the switchyard and electrical transmission and distribution systems during movement of heavy loads and associated crane operations
4. emergency preparedness affected by traffic issues from additional personnel for construction/decommissioning or movement of heavy loads
5. heatsink, coolant reservoir intake and discharge structures or piping for the operating unit(s) affected by construction/decommissioning activities occurring near the structures
6. construction/decommissioning activities that cause damage or unexpected changes to the operating unit(s) physical protection SSCs which render them nonfunctional
7. fire protection plan impacted by construction/decommissioning activities preventing operator actions through the unavailability of equipment or limited methods to access equipment locations
8. material or debris from the construction/decommissioning site that could impact the operating unit(s) SSCs, switch yard, or off-site power supplies during extreme weather conditions
9. wrong unit maintenance or work activity
10. ISFSI impacted by construction activities.
11. temporary equipment, buildings, debris, lay-down yards that adversely affect dikes, drainage, or otherwise disrupt flow of floodwater

Multiple heavy load movement and associated crane operation evolutions are expected to occur during pre-construction and construction activities in and around operating unit(s) which have the potential to affect risk significant SSCs. The potential adverse impact of these evolutions on operating unit(s) depends on the distance from vital SSCs and buried piping, the number access roads supporting pre-construction and construction activities and operating unit(s), and if they occur near transmission lines providing off-site power to operating unit(s) and switch yards. RIs should be aware of licensee's plans for heavy load movements and crane operations. Additionally, concrete booms can extend to heights where impact with off-site power lines maybe a concern. Additional guidance can be found in Operating Experience Smart Sample FY2007 03, Revision 3, "Crane and Heavy Lift Inspection, Supplemental Guidance for IP 71111.20 and IP 71111.13," September 1, 2018, and NUREG 0612, "Control of Heavy Loads at Nuclear Power Plants: Resolution of Generic Technical Activity A 36," issued July 1980.

06.08 Routine Review of Problem Identification and Resolution (PI&R)

*Resident Inspectors should screen each item entered into the licensee's problem identification and resolution system to select samples for follow-up. This review can be accomplished by attending daily PI&R program review board meetings; reviewing computerized PI&R program entries; or reading hard copies of PI&R program documents. The intent of this review is for inspectors to be alert to conditions such as repetitive, long-term, or latent equipment failures or **other adverse trends** that might warrant additional follow-up through IP 71152, "Problem Identification and Resolution (PI&R)" or other baseline inspections. Inspectors must be alert for adverse performance trends and risk-significant or repetitive equipment failures. Repeated failures to meet a technical specification limiting condition of operation or its associated action(s) may be an example of an adverse performance trend. [C1]*

One of the primary goals of the routine reviews is to verify that licensees are identifying issues at an appropriate threshold and entering issues into the PI&R program. This can be accomplished by having inspectors compare issues identified by the NRC during the conduct of the plant status and inspectable area portions of the baseline inspection program IPs with those issues identified by the licensee. The routine review facilitates the selection of issues and operational occurrences for follow-up through the baseline inspection program to ensure that corrective actions commensurate with the significance of the issues have been identified and implemented by the licensee.

Resident Inspectors should also periodically observe licensee management's review of plant deficiencies by attending meetings such as the plant operations review committee and off-site nuclear review board meetings. In addition, most licensees hold Nuclear Safety Culture Monitoring Panels at some periodicity throughout the year (usually quarterly). These meetings allow the licensee to self-assess and determine if there are safety culture or Safety Conscious Work Environment issues before they become larger problems. Inspectors should consider attending Nuclear Safety Culture Monitoring Panels. The inspector should be knowledgeable of major findings from licensee self-assessment activities.

During inspections and plant status reviews, inspectors should be alert for potential performance deficiencies as may be associated with equipment failures, inadequate maintenance work practices, personnel errors, inadequate risk assessments, management and emergent work control problems, procedure deficiencies, or non-compliances with procedures or regulatory requirements. When inspectors identify such conditions, they should examine the licensee's PI&R program records and/or attend licensee PI&R program meetings to verify that the licensee either previously identified and documented the conditions noted by the inspector or acknowledged the inspector's observations and entered those conditions into the PI&R program. Inspectors should be aware of any contribution that cross-cutting aspects make to these performance deficiencies and consider insights that these issues may provide into the licensee's progress in addressing any developing or existing cross-cutting themes. **Inspectors should also be alert for indications that may require performance of IP 81823, "Material Control and Accounting (MC&A)." Those indications are discussed in IP 71152, Section 03.01.**

Inspectors should consider the potential for long-term degradation of SSCs or acceptance of long-standing degraded SSCs, as indicated by multiple similar entries in

the licensee's PI&R program. The licensee's evaluation and resolution of such degraded SSCs should be considered for further inspection utilizing the appropriate baseline inspection procedure. For example, "use-as-is" determinations, revision of engineering or operational acceptance criteria, reductions in design or operational margin, and repetitive work orders could be indicative of licensee acceptance of a long-standing degraded condition.

During routine screening, RIs should evaluate whether the licensee should perform an evaluation in accordance with 10 CFR Part 21—REPORTING OF DEFECTS AND NONCOMPLIANCE of any defect or non-conformance that has been identified. Inspectors should review and be aware of applicable 10 CFR 21 notifications and verify that the issues have been entered into the licensee's PI&R program for evaluation and disposition. [C2] Additionally, inspectors should be cognizant of the appearance of counterfeit, fraudulent, and suspect items (CFSI) and ensure that any potential CFSI issues are screened through the Operating Reactor Experience Clearinghouse.

Degradation and failures due to aging effects, such as loss of material, loss of preload, or cracking, can occur. Plants with renewed licenses have established AMPs to identify, address, and/or prevent aging effects prior to loss of intended function for those SSCs within the scope of the AMP. When degradation or failures occur that appear to be age-related, inspectors should consider performing additional review using IP 71111.24, "Testing and Maintenance of Equipment Important to Risk," to determine whether the SSC is being managed by an AMP. If so, the inspector should also determine whether the activities in the AMP are adequate to identify the aging effect prior to loss of SSC intended function, and whether the licensee's corrective actions address the adequacy of the AMP. Consult with the regional license renewal point of contact for support in evaluating the adequacy of the AMP.

Inspectors should remain alert to problems or conditions that could have more than minor safety significance and for which the licensee's investigation, conclusions, and/or corrective actions appear to be inadequate. Inspectors should follow-up on concerns through the appropriate baseline inspection procedures.

2515D-07 RESOURCE ESTIMATE

The yearly resource expenditures for plant status activities are estimated to be on average: 754 hours for a single-unit site; 804 hours for a dual-unit site; and 1114 hours for a triple-unit site. Resource estimate for Vogtle Unit 1 & Unit 2 is 804 hours total. Resource estimate for Vogtle Unit 3 & Unit 4 is 804 hours total. These yearly resource expenditures include time spent on routine PI&R review. Time expended conducting these activities should be charged to code PS (plant status).

2515D-08 REFERENCES

IMC 0327, "Steam Generator Tube Primary-to-Secondary Leakage"

IMC 0620, "Inspection Documents and Records"

IMC 2515, "Light-Water Reactor Inspection Program - Operations Phase"

IP 71111.04, "Equipment Alignment"

IP 71111.15, "Operability Determinations and Functionality Assessments"

IP 71111.20, "Refueling and Other Outage Activities"

IP 71111.24, "Testing and Maintenance of Equipment Important to Risk"

IP 71130.15, "Security Operations (Resident Inspectors)"

IP 71151, "Performance Indicator Verification"

IP 71152, "Problem Identification and Resolution (PI&R)"

IP 71153, "Follow-up of Events and Notices of Enforcement Discretion"

NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants: Resolution of Generic Technical Activity A 36," July 1980 (ML070250180)

Regulatory Issue Summary (RIS) 2007-21, "Adherence to Licensed Power Limits," Revision 1 (ML090220365)

Operating Experience Smart Sample FY2007 03, Revision 3, "Crane and Heavy Lift Inspection, Supplemental Guidance for IP 71111.20 and IP 71111.13," September 1, 2018 (ML18151A450)

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline"

END

Attachment 1: Reactor Coolant System (RCS) Pressure Boundary Leakage Monitoring

- 1-01. To ensure that the licensee properly monitors for RCS pressure boundary leakage or potential unidentified leakage exceeding TS limit, the inspector should routinely determine if the licensee:
- a. Monitors leak detection systems such as the containment atmosphere particulate radioactivity instruments, the containment sump flow/level instruments, the containment atmosphere gaseous radioactivity instruments, the containment humidity instruments, and/or any plant-specific instrumentation to indicate potential RCS leakage. Also, trends these parameters for potential adverse trends.
 - b. Takes appropriate actions for degraded or inoperable leak detection instrumentation or alarms in accordance with TS and responds to alarms in accordance with alarm response procedures. Also, periodically verifies that the alarm response procedure actions are consistent with plant licensing documents.
 - c. Periodically performs the inventory balance check (PWR only) and attempts to confirm RCS unidentified leakage with alternate and diverse means, such as, changes in containment sump level or sump pumping frequency and volume.
 - d. Takes appropriate actions in accordance with plant-specific leak rate impact or leakage investigation procedures (leakage source identification, quantification, classification, etc.) when RCS leakages are suspected. Also, considers unidentified leakage as identified leakage only when the leak rate has been actually measured and identified.
 - e. Conducts activities to identify sources of RCS unidentified leakage. Documents actions taken to identify sources of unidentified RCS leakage in the control room logs or in the PI&R program, as specified in plant administrative procedures. The licensee's leak identification plan includes actions such as system walkdowns; system surveillance and re-alignment; containment entry (PWR only) and visual inspections for boric acid deposits (PWR only); verification of pumps and valves for possible seal and packing leakages; inspection of pipe flanges and major welds, including instrument lines and connections; and sampling/ performing isotopic analysis of atmospheres, filter elements, and sumps.
 - f. Trends unidentified leak rates, pays particular attention to changes in unidentified leakages, and takes appropriate corrective action for adverse trends. Also, trends other containment parameters such as containment sump in-leakage rates, the containment air/gaseous radiation monitor indication, the containment particulate radiation monitor indication, and the containment humidity indication to validate potential RCS unidentified or pressure boundary leakages.

Since increasing levels of unidentified RCS leakage could indicate Reactor Coolant System pressure boundary (RCPB) degradation, additional actions should be taken for significant adverse trends especially when leakage exceeds 0.1 gpm and/or other leakage indications. The actions should include as deemed appropriate:

- 1) Assess licensee's actions to ensure containment parameters are appropriately being monitored and to respond to adverse leakage trends in accordance with site-specific procedures;

2) Review containment data such as sump chemistry samples, pump seal pressures and temperatures (recirculation pumps (BWRs), reactor coolant pumps (PWRs), control rod drive temperature (BWRs), containment atmosphere temperature, pressure, radioactivity, humidity levels, etc.) to determine if source can be attributed to actual RCS leakage;

3) If RCS leakage is confirmed, review licensee's plans for identifying source of unidentified leakage and proposed corrective actions. The inspector should use IP 71111.24, "Testing and Maintenance of Equipment Important to Risk," to verify licensee's surveillance activities and IP 71111.04, "Equipment Alignment," to conduct any plant walkdown. Review any operational and technical decision-making activities and pursue any operability concerns using IP 71111.15, "Operability Evaluations and Functionality Assessments."

Attachment 2: Revision History for IMC 2515 Appendix D

| 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 | 04/03/00 CN 00-003 | Reactivated | N/A | N/A |
| N/A | ML020380441 01/17/02 CN 02-001 | Revised | N/A | N/A |
| N/A | ML031980014 7/10/03 CN 03-024 | Revised to add a statement to remind resident inspectors to periodically check Part 9900 of the inspection manual to keep current on reporting requirements. | N/A | N/A |
| N/A | ML032660080 9/09/03 CN 03-033 | Revised to provide improved guidance to an inspector on the requirement to inform the Materials and Chemical Engineering Branch, NRR, of steam generator tube leaks of greater than three gallons per day. | N/A | N/A |
| N/A | ML041340196 5/11/04 CN 04-013 | Added guidance for reviewing RCS leakage monitoring. Also, requirement to monitor licensee actions when in multiple TS action statements. New requirement to review licensee corrective action summary reports. | N/A | N/A |
| N/A | ML050410038 1/26/05 CN 05-003 | Added more detail to requirement for RCS leakage monitoring. | N/A | N/A |
| N/A | ML053330037 12/2/05 CN 05-032 | Additional clarification to guidance on RCS unidentified leakage trending. Resource estimate for Plant Status has been increased. | N/A | N/A |

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|----------------------------|---|--|--|---|
| N/A | ML0616403980 1/26/07 CN 07-004 | Included reference to IP 61706 for evaluating reactor power fluctuations (FF 2515D-945). Revised Plant Status resource estimate. Added guidance to inspectors on being sensitive to licensee's actions taken to address security concerns do not adversely affect reactor safety and emergency preparedness. Likewise, licensee's actions taken to address reactor safety concerns do not adversely affect plant security (FF 2515-D-998). | N/A | ML063460228 |
| N/A | ML070740557 04/04/07 CN 07-012 | This IMC has been revised to update the RCS unidentified leakage rate spreadsheet web page links. Spreadsheets were updated and converted from Quattro Pro to Excel. | N/A | N/A |
| N/A | ML080310091 05/01/08 CN 08-014 | Revised to include checking for online maintenance activities that could interfere with SSCs and added leakage trending for the first 3 months after the start of a refueling cycle. This revision addresses feedback forms 2515-D-1157 and 2515-D-1178. | N/A | N/A |
| N/A | ML082110297 09/03/08 CN 08-025 | Revised to address lessons learned from severe corrosion of essential service water piping risers at Byron plant (see Operating Experience posting of 10/23/2007) as documented in FF 2515D-1214. Also, incorporated recommendations from FFs 2515D-1156 and 1258 to clarify how to charge for inspection resources used to support facility status reviews for the Security and Safeguards Inspection Program (SSIP) and to make inspectors aware of Plant Status procedure for SSIP (IMC 2201 Appendix D). | N/A | ML082410742 |

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| N/A | ML0921802911 1/09/09 CN 09-026 | Revised to add guidance for inspectors to look for indications of fatigue when performing plant status reviews. The guidance also provides a reference to new inspection guidance in IP 93002. | Yes 6/17/2009 | N/A |
| N/A | ML093220843 02/02/10 CN 10-004 | Added requirement to have resident inspectors conduct quarterly tours of security-related areas as recommended by CY 2009 ROP realignment process (ML092090312). Increased inspection resources allocated to Plant Status procedure by 16 hours per year to conduct these additional tours of security-related areas by resident inspectors. | N/A | ML100070084 |
| N/A | ML11279A083 02/24/12 CN 12-003 | Provided guidance to be sensitive to deficient equipment conditions which may have resulted from tampering by personnel. Also, made changes to address regional comments associated with feedback forms 1308; 1423; and 1624. | N/A | ML12027A113 |
| N/A | ML15128A229 09/04/15 CN 15-016 | Changes include revisions to (1) power limit reference guidance, (2) RCS unidentified leakage action levels, and (3) ensure awareness of installation of temporary services. Feedback forms incorporated into this revision: 2078, and 2141. Feedback forms reviewed but not incorporated: 2122 and 2131. | N/A | ML15187A245 2515D-2078 ML15246A008 2515D-2141 ML15246A009 |

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| N/A | ML16111B120 04/27/16 CN 16-011 | The Action Level “triggers” described in Attachment 1 were updated to incorporate Regional feedback and the changes recommended in Feedback Form 2141 (and previously adopted through CN 15-016) have been rescinded. [NOTE: The version of this IMC issued on 9/4/15 with an effective date of July 1, 2016 was not implemented and has been superseded by this version]. | N/A | ML16112A026 |
| N/A | ML17152A186 08/25/17 CN 17-016 | Revised to indicate that control room walkdown includes review of any compensatory measures in place. Feedback forms incorporated into this revision: 2230. Feedback forms reviewed but not incorporated: 2222. | N/A | ML17156A218 2515D-2230 ML17178A039 |
| N/A | ML17264A782 10/03/17 CN 17-020 | Revised to address issues identified IMC 307 peer review (ML16260A079 & ML17047A602). This proposed revision was agreed upon by all members present at the Fall 2017 Reactor Oversight Process Branch Chief Counterpart Meeting. All members also indicated that there is no need for a comment period and the proposed revision can be issued as final. | N/A | N/A |

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| N/A | ML18134A177 11/19/18 CN 18-039 | Revised to address: (1) comments provided by NRR/DMLR related to the period of extended operation, (2) Feedback Forms 9900-2273 and 71111.08-2275 which resulted in creation of new IMC 0327, "Steam Generator Tube Primary-To-Secondary Leakage," (3) use of mandatory and discretionary language with regards to steam generator tube primary-to-secondary leakage reports to NRR, and (4) a recommendation from the working group established to update the ROP for regulatory actions taken following the Fukushima Dai-ichi accident (ML17164A285). | N/A | ML18179A040 |
| N/A | ML20238B970 10/05/20 CN 20-046 | Revisions are made to reflect resources specifically for Vogtle 3 & 4 as identified in SECY-20-0050, "Planned Revisions To The Baseline Inspection Program For The AP1000 Reactor Design," (ML20058F491). | None | ML20239A734 |
| N/A | ML20323A037 01/13/21 CN 21-004 | Consolidated IMC 2515, Appendix F, "Reactor Construction Activities Near Operating Unit(s)," into this IMC. Incorporated FF 2515D-2412 to add Nuclear Safety Culture Monitoring Panels as a meeting that should be attended. Incorporated guidance regarding Open Phase Condition monitoring. | None | ML20325A208 2515D-2412 ML20325A226 |

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| [C1] [C2] | ML21241A180 12/14/21 CN 21-040 | <p>Transferred daily problem identification and resolution review from IP 71152 to this appendix. Commitment tracking brought over with revision. Specifically, incorporated recommendations made by the PI&R focus group to address several items from the Davis-Besse Lessons Learned Task Force (Commitment C1); and added guidance to ensure that potential Part 21 issues are evaluated on a continual basis (Commitment C2).</p> <p>Additionally, added additional awareness considerations for inspector control room tour.</p> | None | ML21281A183 |
| | ML22251A314 11/07/22 CN 22-024 | <p>Moved guidance items from 2515D-01 to 2515D-06 IAW IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual." Editorial changes to comply with revised NUREG-1379 "NRC Editorial Style Guide" standards. Edited Section 06.06 to broaden the guidance to include any construction occurring onsite. Clarified wording in Section 06.07 to suggest inspectors transition to IP 71111.12 for detailed follow-up of inspection concern. Moved all RCS leakage guidance to attachment 1, nothing was removed.</p> | None | ML22256A181 2515D-2449 ML22033A212 |
| | ML25072A252 06/20/25 CN 25-017 | <p>Removed Enclosure 1 RCS Leakage Guidance as part of Advance Act implementation.</p> | None | ML25097A275 |

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| | ML25345A273 05/01/26 CN 26-019 | Revised to include PI verification guidance. In addition, a portion of the inspection guidance associated with the review of security operations has been moved to IP 71130.15. These revisions were recommended as a result of the ADVANCE Act 507 Report to Congress that discussed the revision of the ROP Baseline Inspection Program. | N/A | ML25274A088 2515D-2576 ML25213A159 |