

Changes to Inspection Manual Chapter (IMC) 2545, “Non-Power Production and Utilization Facility Inspection Program—Operations Phase”

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Purpose and Applicability

- Purpose
 - Change
 - Inspection program inclusive of all non-power production and utilization facility types (not only “RTRs”)
- Applicability
 - Change
 - Applies during operations (or extended shutdown) only
 - Does not apply during decommissioning (or construction)
 - No change
 - Facilities licensed under §50.21(a) or (c), or §50.22, as applicable, of 10 CFR Part 50

Program Objectives

- Objectives
 - Change
 - Adds objectives that were already part of program:
 - To identify safety issues that may have potential generic applicability (may result in inspection, information notice, etc.)
 - To ensure timely follow-up of open items (event notifications, unresolved items, etc.)
 - No change
 - Objective from current revision:
 - To verify that licensees operate in accordance with applicable regulatory requirements

Inspection Program

- Change
 - Uses “Baseline” and “Non-Baseline” (formerly, routine/non-routine)
 - Program completion defined as all baseline procedures implemented within applicable “inspection cycle”
- No change
 - When (or why) these inspections are performed

Baseline Inspections

- Minimum amount of inspection that all facilities receive regardless of performance
- Includes the usual Operations (safety) and Safeguards (security) inspections
- Includes “as needed” inspections (fuel transit), and routine follow-up of open items

Non-Baseline Inspections

- At NRC management discretion (due to performance, actual event, etc.)
- Includes Supplemental and Reactive inspections, Temporary instructions
- May be in addition to or in lieu of baseline inspections

Inspection Frequency

- Change
 - Uses “Inspection cycle” based on calendar-years (not rolling calendar)
 - Removes grace period (from previous frequency definitions)
 - Inspection cycle effectively equivalent to inspection frequency
- No change
 - Frequency remains determined by Class/Category (see table below)
 - 10 CFR Part 37 inspections (Category 1/2 RAM) remain every other baseline safeguards inspection

Baseline Program	Inspection Cycle		
	Annual	Biennial	Triennial
Operations	Class I	Class II	Class III
Safeguards	Category I	Category II	Category III

Classes and Categories

Operations Class

- Change
 - Clarified entry condition for Class III designation (extended shutdown) to facilitate faster transfer
- No change
 - Class I and II definitions (remains at 2 MWt threshold)
 - *May need to revisit Class definitions if/when other-than-non-power reactors begin operations*

Safeguards Category

- Change
 - Clarifies inspection frequency for facilities with less than LSS quantities of SNM is triennial
- No change
 - Category I, II, and III definitions (quantity of non-exempt SNM)

Inspection Procedures

- Operations
 - Change
 - New, revised Class I, II and III inspection procedures (IPs)
 - Class I and II procedures combined
 - Removes references to sample sizes (like safeguards IPs)
 - No change
 - Inspection areas, subjects, topics, etc.
 - Greater inspection hour allowance at Class I facilities
 - *May need to revisit inspection procedures if/when other-than-non-power reactors begin operations*
- Safeguards
 - No change

Inspection Scheduling

- Change
 - Inspections can occur at any time during inspection cycle (not just one year from the last)
- No change
 - Inspections should occur when facilities perform operations or other licensed activities (fuel inspections/movement, drills/exercises, experiments, maintenance, modifications, etc.)
 - Half of operations procedures typically implemented in any one visit
 - Operations and Safeguards inspections could occur during same year (or week)
 - Facilities should expect (at least) one inspection per calendar year
 - Inspector should contact facility 2+ months before onsite inspection
 - Inspections are still announced

Very Low Safety Significance Issue Resolution (VLSSIR) Process

- Change
 - Adds VLSSIR Process
 - Entry criteria
 - Ambiguity in applicability/application of a requirement
 - No potential for greater than Severity Level IV significance
 - Time to resolve issue outweighs safety benefit of resolution
 - Documented in inspection report
 - Does not require a response
 - Issue could be reopened pending new information
 - *Not intended to resolve NRC/licensee disagreements!*

Inspection Results

- Potential inspection results documented in reports
 - Change
 - Adds documentation of use of VLSSIR process
 - Removes use of inspection follow-up items (IFIs)
 - No change
 - No violations of more than minor significance were identified
 - Minor violations (usually only associated with closure of ENs)
 - Cited violations (Severity Level IV+ NOVs)
 - Non-cited violations (Severity Level IV+ NCVs)
 - Apparent violations (AVs)
 - Unresolved items (URIs)
 - Discussed items
 - Observations
 - Enforcement discretion violations

Implementation

- Currently available on public website:
 - New revision of IMC 2545 (inspection program)
 - ADAMS Accession Number: ML26161A027
 - <https://www.nrc.gov/docs/ML2616/ML26161A027.pdf>
 - New revision of IP 69014 (operations procedures)
 - ADAMS Accession Number: ML26156A176
 - <https://www.nrc.gov/docs/ML2616/ML26161A027.pdf>
- Effective date for IMC 2545 and IP 69014:
 - January 1, 2027

Questions

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References

- 10 CFR Part 50
 - <https://www.ecfr.gov/current/title-10/chapter-I/part-50>
- How We Regulate
 - <https://www.nrc.gov/about-nrc/regulatory>
- Values
 - <https://www.nrc.gov/about-nrc/values>
- Non-Power [Reactor] Facilities
 - <https://www.nrc.gov/reactors/non-power>
- Inspection Procedures
 - <https://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index>
- Inspection Manual Chapters
 - <https://www.nrc.gov/reading-rm/doc-collections/insp-manual/manual-chapter/index>
- NUREGs
 - <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/index>
- Regulatory Guides
 - <https://www.nrc.gov/reading-rm/doc-collections/reg-guides/index>
- Event Notifications
 - <https://lersearch.inl.gov/ENSearchCriteria.aspx>