
INSPECTION PROCEDURE 88201 APPENDIX B

MAINTENANCE

Effective Date: June 20, 2025

PROGRAM APPLICABILITY:IMC 2600, 2694

88201.B-01 INSPECTION OBJECTIVES

- 01.01 To determine, for new facilities or new processes at existing facilities, if the applicant or licensee has established and is implementing an effective maintenance program for item(s) relied on for safety (IROFS) and other safety controls to ensure their availability and reliability to perform their function when needed as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 70.64(a)(8) or the licensing basis, as applicable.
- 01.02 To determine if the applicant's or licensee's maintenance program adequately establishes and is implementing measures associated with corrective maintenance, preventive maintenance (PM), surveillance and monitoring, and functional testing, as applicable, consistent with the licensing basis and integrated safety analysis (ISA).
- 01.03 To determine whether effective corrective actions are taken when an IROFS or other safety control fails or is degraded.
- 01.04 To determine if the applicant's or licensee's maintenance program is adequately coordinated and integrated with other management measures.

88201.B-02 INSPECTION REQUIREMENTS

This inspection procedure (IP) is intended to provide inspection requirements and guidance applicable to a wide variety of potential construction projects at both existing and new fuel cycle facilities. These projects may vary greatly in scope, complexity, and risk to public health and safety. As a result, not all sections, or subsections, of this appendix may be applicable or implemented at a specific facility. Recommended inspection scope and hours for a specific new fuel cycle facility will be documented in the principal inspection plan (PIP) for that facility developed in accordance with Inspection Manual Chapter (IMC) 2694, "Fuel Cycle Facility Construction and Pre-Operational Readiness Review Inspection Program." Additionally, this appendix can be used to provide additional management measures inspection guidance for plant modification inspections at existing facilities but is not required to be implemented for these projects. Use of this appendix or sections of this appendix for modifications at existing fuel cycle facilities, would be done on a case-by-case basis, in accordance with IMC 2600, Appendix B, "NRC Core Inspection Requirements."

02.01 Inspection of Maintenance Implementing Documents

Review relevant sections of the applicant's or licensee's ISA. Determine if appropriate measures have been established for maintenance of IROFS to ensure their availability and reliability to perform their function when needed.

02.02 Inspection of Maintenance Implementation

For selected maintenance activities, review the selected action, including observation of ongoing activities where possible.

a. Work control procedures

Determine whether work control procedures were adequately implemented to assure adequate review and approval of proposed work, including a maintenance work order.

b. Pre-job planning

Determine the adequacy of pre-job planning where required by the application or license.

c. Work package

Determine the adequacy of work packages (e.g., work request, maintenance procedure, tag-out, etc.) prepared for maintenance activities and whether applicant or licensee procedures were followed.

d. Maintenance observations

Determine whether maintenance work activities on selected systems and processes are conducted according with the applicant's or licensee's requirements and/or commitments and procedures.

e. Post-maintenance testing

Determine whether appropriate post-maintenance testing and calibrations, as specified by the applicant's or licensee's requirements and/or commitments (e.g., ISAs, applicant's or licensee's procedures, etc.), are performed prior to returning the component or system to operational status.

f. Completed work package

Determine whether requirements for reviewing the completed maintenance activities by maintenance, engineering, or operations supervision are being adequately met prior to returning equipment to service.

02.03 Surveillance and Calibration Testing Implementation

For the surveillance testing activities selected in Section 02.02 above, review the selected test and/or calibrations, including observation of ongoing activities where possible.

a. Surveillance

Determine whether surveillance tests are conducted according to the procedures and at the required frequency.

b. Calibrations

Determine whether calibrations are conducted according to the frequency, requirements, and procedures.

c. Criticality Alarm Monitoring Systems

Determine whether the criticality safety monitoring system is tested and calibrated as required by license or certificate requirements.

02.04 Audits

Determine if the applicant or licensee has conducted audits or self-assessments in the area of maintenance and surveillance and is in compliance with license requirements, if applicable.

02.05 Training

Review training in the area of maintenance and surveillance and evaluate if training is in compliance with application or license requirements and/or commitments.

02.06 Organizational Structure

Evaluate if a change occurred in the maintenance and surveillance program organization that is applicable to the position-specific requirements of the application or license. If applicable, verify that the new manager or staff member meets the criteria of the application or license requirements and/or commitments. Verify that any changes to the organizational structure in the area of maintenance and surveillance are in compliance with application or license requirements and/or commitments, if applicable.

02.07 Maintenance Problem Identification and Resolution

Determine whether the applicant or licensee is identifying safety control or IROFS maintenance or surveillance problems at an appropriate threshold and entering them into the corrective action program. Determine, for selected applicant or licensee identified items, whether effective corrective actions have been taken.

88201.B-03 INSPECTION GUIDANCE

General Guidance

- a. The inspection requirements of this procedure are those tasks that must be performed to complete the inspection. Inspection planning is a key element of performing a thorough and meaningful inspection. Inspection plans must be developed and approved prior to the start of the inspection and must consider the safety significance of the items to be inspected. Deviation from the approved inspection plan must be discussed with the inspection supervisor as soon as practicable. Guidance on inspection planning can be

found in IMC 2694, "Fuel Cycle Facility Construction and Pre-Operational Readiness Review Inspection Program."

- b. In preparation for the inspection, the inspector should discuss with the project inspector, resident inspector, if applicable, and project manager any safety equipment availability or reliability problems (such as recurring failures or failures resulting in reportable events) the applicant or licensee has been experiencing. In addition, the inspector should discuss facility operations to ensure a sampling of risk significant maintenance tasks and operations are evaluated, even if reliability has not been a concern. Select from this list the controls for the more risk significant operations to review during the inspection. In addition, once on site, the inspector should initially determine what maintenance and surveillance activities of safety controls or IROFS are scheduled to be performed by the applicant or licensee during the period of the inspection. From this, the inspector should select a sample of maintenance and surveillance activities for risk significant operations to observe during the inspection. The inspector should use the ISA summary or other safety analysis to determine the risk significant operations. In addition, the inspector should consider inspecting a small sample of non-IROFS related maintenance to verify that the maintenance program is adequately implemented throughout the facility and is not only effective for IROFS specific maintenance.
- c. Licensed fuel facilities conduct maintenance outages or otherwise schedule planned outages on a periodic basis. Inspection activities for major modifications to existing facilities should be scheduled to coordinate with licensee planned outages whenever possible. This maximizes opportunities to observe maintenance work activities performed in the field and the subsequent surveillance activities for safety controls or IROFS as they are returned to service after maintenance. Under these circumstances the licensee should be contacted several weeks ahead of the scheduled outage to ensure proper understanding of the outage scope. It is important to understand the nature of the outage in order to determine the scope of maintenance activities and IROFS work that may be available for inspection during the outage period.
- d. Inform an applicant or licensee representative that you would like to be kept informed of any change in the schedule of these maintenance or surveillance activities to assure that an inspector observes them.

Specific Guidance

03.01 Inspection Requirement 02.01

a. Inspection of Maintenance Implementing Documents

The inspector should find implementing documents that specifically address corrective maintenance, PM, surveillance and monitoring, and functional testing for IROFS.

03.02 Inspection Requirement 02.02

a. Work control procedures Implementation

1. Work control procedures usually require the use of a "work order" or similar document. Administrative control procedures should define the review and approval sequence for this document and require that maintenance activities on safety

controls or IROFS, or in the proximity of critical or vital equipment, be performed under the work order system. Work orders might include the following elements:

- (a) identification of work activity
 - (b) work group(s) involved
 - (c) foreman in charge
 - (d) ignition source controls
 - (e) fire watch requirements
 - (f) special work controls
 - (g) maintenance supervision approval signature
 - (h) operating staff review signature, and
 - (i) operations supervision approval signature
2. Troubleshooting: Applicants or licensees might be required to have procedures for controlling troubleshooting activities such as removing and returning equipment to service, use of lifted leads and jumpers, and post activity testing. Although an applicant or licensee could have a procedure that addresses the general plan of the troubleshooting activity, it is not always necessary that all of the steps performed as part of a troubleshooting activity be defined in a step-by-step procedure. However, documentation of troubleshooting activities for safety controls or IROFS should provide evidence that the activity was performed properly.
3. Also ensure that the applicant or licensee is not using troubleshooting to circumvent the requirements of the standing maintenance procedures and policies, nor is troubleshooting being used as means to implement a work-around for a problem instead of repairing it.

b. Pre-job planning

For complex corrective maintenance activities, recurring failures, or failures resulting in reportable events, evaluate the adequacy of pre-job planning by reviewing available records or questioning responsible licensee personnel to determine if the applicant or licensee performed the following pre-job planning activities:

- 1. reviewed plant machinery history or industry operating data for similar equipment failures
- 2. reviewed vendor technical manuals and incorporate appropriate vendor recommendations into maintenance procedures
- 3. obtained engineering support, when needed, to address complex maintenance issues
- 4. prepared written procedures, where necessary, to perform complex maintenance activities
- 5. reviewed post-maintenance and/or post-modification system test alignments and control for exiting those alignments
- 6. used formal root-cause analysis methods, as necessary, to identify the causes of maintenance failures

7. identified special skills or qualifications, special tools and equipment, or spare parts needed to perform the maintenance activity
8. assessed the IROFS out of service to determine the overall effect on safety of performing the planned maintenance activity, as applicable
9. Inspectors should check that newly installed parts are replaced as a like-for-like or that appropriate design change evaluations are available.

c. Work package

Determine if the work package (e.g., work request, maintenance procedure, tag-out, etc.) prepared for the maintenance activity addressed the elements listed below that are required by the applicant's or licensee's procedures. (Note: that all the below elements might not be required in each applicant's or licensee's program).

1. The procedure conforms to the applicant's or licensee's administrative requirements for format, approval, and control.
2. The procedure conforms to the applicant's or licensee's administrative requirements for format, approval, and control.
3. The procedure addresses the interface activities associated with the maintenance/repair/replacement of a component such as lockout/tag-out, removing a component from service, process line breaks, radiation work permits, release from operations, equipment status control, return to service, and post-maintenance testing.
4. Inspection hold points, independent verification points, or appropriate peer reviews are identified in the procedure or in a documented plan and are appropriate for the activity.
5. Supplementary reference materials, such as drawings and technical manuals, are adequate, controlled, and up to date.
6. The work activities are described in a level of detail that is commensurate with the complexity of the maintenance activity. Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step procedures for simple tasks.
7. Consideration is given to cleanliness requirements and personnel hazards such as chemical, radiological, temperature, pressure, and electrical hazards.
8. Provisions for fire protection and security are included. Work involving welding, open flame, or other ignition sources, should require:
 - (a) special authorization;
 - (b) a special survey or evaluation of the proposed work area to identify nearby flammable material, vital cable runs, critical process equipment, etc.; and
 - (c) a fire watch. If the maintenance activity is to be performed in the proximity of flammable material, vital cable runs, etc., the fire watch should have the

capability of communicating with the appropriate organization (process control area, fire brigade). The individual performing the fire watch should know what actions to take in the event of a problem.

9. Instructions and quality control (QC) checks are included to verify that environmentally qualified (EQ) equipment is properly protected against moisture intrusion when reassembled and that proper EQ material, especially elastomers, have been installed.
10. Provisions for control of equipment, including lifted leads, jumpers, bypasses, and mechanical blocks are included.
11. Interfacing activities with the operations/production and safety/health physics personnel are verified. Where applicable, safe work procedures, job hazard analysis, and/or radiological, nuclear criticality safety (NCS), or chemical hazards should be referenced.
12. Provisions for obtaining formal approval from operations are included, as well as methods for notifying operations when affected systems are removed from service, ready to be restored to normal service, or if problems are encountered.
13. Provisions for material, parts, and tool accountability to ensure loose items are not inadvertently left inside equipment after the work is complete.
14. Provisions for procedure or standard task prerequisites, such as scaffold engineering evaluations and requests, breach of fire/air/radiation barriers, and radiation protection requirements, are included.
15. Replacement parts for a given job will be properly controlled and identified for its end-use.

d. Maintenance Observations

For the maintenance activities selected, determine whether:

1. Maintenance personnel assigned understand the scope of the task and are familiar with the procedures.
2. Up-to-date written procedures are being implemented in the field and that steps in the procedures are carried out sequentially, unless otherwise specified.
3. Applicable parts of the work package are satisfied for the work in progress.
4. The maintenance personnel are qualified for their respective tasks.
5. Supervisory oversight of the work is adequate.
6. The QC personnel assigned are knowledgeable of the task.
7. Apparent cause of failure appears to be addressed by appropriate corrective action, including measures to prevent recurrence.
8. Appropriate health physics support is available.

e. Post-maintenance testing (PMT)

Procedure contents should normally include testing provisions following maintenance. Written procedures should be available for performing maintenance, calibration, and surveillance requirements for safety controls, including where applicable, NCS control systems and IROFS identified in the ISAs. There should be records to confirm that the work was performed. For each testing activity selected, identify the affected systems and/or components and review the following:

1. The applicable licensing basis and/or design-basis documents to identify the safety functions of the affected systems and/or components.
2. The associated maintenance activity to identify the safety functions that may have been affected by that activity.
3. The applicant's or licensee's test procedure to determine whether the procedure adequately tests the safety functions affected by the maintenance activity. Determine whether the acceptance criteria in the procedure are consistent with information in the applicable licensing basis and/or design-basis documents. Determine whether the procedure has been properly reviewed and approved.
4. Either witness the test and/or review the test data, to determine whether:
 - (a) The performance of the affected systems and/or components satisfy the procedure's acceptance criteria.
 - (b) The effects of testing on the plant have been adequately addressed.
 - (c) The measuring and test equipment (M&TE) is calibrated and is within its current calibration cycle.
 - (d) The M&TE is within its required range and accuracy.
 - (e) The applicable prerequisites described in the test procedure are satisfied.
 - (f) The affected systems or components are removed from service in accordance with approved procedures.
 - (g) The test is performed in accordance with the test procedure and other applicable procedures.
 - (h) Any lifted leads or jumpers, both electrical and pneumatic, are controlled and restored.
 - (i) The test data/results are accurate, complete, and valid.
 - (j) The test equipment is removed after testing.
 - (k) After completion of testing, equipment is returned to the positions/status required to maintain the system operable in accordance with the current operating mode using approved procedures.
 - (l) Any problems noted during testing are appropriately documented.

Note: Applicant or licensee PMT is often conducted by performing a related, existing surveillance procedure for operability determination. Inspectors should assure that the testing performed not only provides a snapshot of the safety controls or IROFS' operability but actually evaluates the adequacy of the maintenance or repairs to the controls being tested.

Note: As a minimum, perform a review of the completed test procedure and the recorded data. However, where possible, the inspector should also attend the pre-job briefing, witness the test when it is performed, and attend any post-test critiques, as applicable.

f. Completed work package

Determine whether the maintenance activities are reviewed by maintenance, engineering, or operations supervision upon completion prior to returning equipment to service PMT.

03.03 Implementation (Inspection Requirement 02.03)

a. Surveillance

1. The application or license, applicant or licensee procedures, or the ISA will specify which safety controls require periodic surveillance tests. The risk-significance of particular IROFS and NCS controls is specified in the ISA. For 10 CFR Part 70 licensees, these surveillance tests and calibrations are to verify that IROFS are available and reliable to perform their function when needed. Procedures should be developed, reviewed, and approved under the licensee's or certificate holder's procedural control system. The procedures should specify:
 - (a) prerequisites and preparation for the test
 - (b) functional tests of instruments in conducting the surveillance test
 - (c) acceptance criteria
 - (d) operational checks to be made before returning equipment to service
 - (e) deficiency reports documented for failures
2. Examine those procedures related to the tests selected for observation. Determine whether surveillance tests required by the application or license are conducted using properly approved procedures.
3. Examine the technical content of procedures for the selected surveillances to determine that satisfactory tests will be conducted. The objective is to determine whether the procedure will satisfy the applicable application or license requirement or will demonstrate that IROFS are available and reliable. The surveillance requirement and the bases of the application or license requirements, or description in the safety analysis report or the application, should be used to aid in this determination. Examine the procedure and check-off sheets to determine if valve lineup, or other similar requirements, are correct for the test activity and the return of the component or system to service.
4. Determine whether, for tests selected above, that test results conform with application or license requirements, and that test results have been reviewed and approved by appropriate supervision. The test results should be reviewed and

approved by someone other than the person performing the test or the person directing the test.

5. Other significant surveillance test attributes for consideration include the following:

- (a) Preconditioning does not occur.
- (b) Effect of testing on the plant has been adequately addressed by control room and/or engineering personnel.
- (c) Acceptance criteria are clear and demonstrates operational readiness and are consistent with the supporting design calculations and other licensing documents.
- (d) M&TE range and accuracy are consistent with the application and has current calibration. Verify the plant equipment calibration is correct, accurate, properly documented, and the calibration frequency is in accordance with licensee or certificate holder procedures; and commitments.
- (e) Test is performed in sequence and in accordance with written procedure.
- (f) Jumpers installed or leads lifted during testing are properly controlled.
- (g) Test data is complete, verified, and meets procedure requirements.
- (h) Test frequency was adequate to demonstrate operability (meets license or procedure requirements), and reliability.
- (i) Test equipment is removed after testing.
- (j) After completion of testing, equipment is returned to the positions/status required for the performance of its safety function.
- (k) For test results that do not meet the acceptance criteria, results of an adequate operability determination are acceptable.
- (l) For selected safety-related instrumentation and control surveillance test verify that reference setting data has been accurately incorporated to the test procedure

b. Calibrations

1. Determine whether calibrations are performed at the required frequency for safety controls and IROFS. During the review of calibration procedures and calibration records, determine whether provisions are included to acknowledge that applicable application or license requirements for limiting conditions for operation are in effect. Determine whether the service status of the system was in conformance with the applicable limiting conditions of operation specified in application or license requirements. Examine the technical content of procedures for the selected calibrations to determine that satisfactory calibration of monitoring components will result. In the review of procedures, look at a sample of stepwise instructions to determine if the following considerations have been included:

- (a) appropriate signal compensations are included,
 - (b) point of signal insertion is specified, and
 - (c) calibrations are appropriate to the range and use of equipment.
- 2. Determine whether procedures used to calibrate the monitoring component selected contain:
 - (a) review and approval requirements of application or license conditions,
 - (b) acceptance values for trip settings that conform to application or license requirements,
 - (c) detailed stepwise instructions, and
 - (d) deficiency reports documented for out-of-tolerances.
- 3. The objective is to determine whether the procedure will satisfy applicable application or license requirements. The surveillance requirements and the bases of the application or license requirements, or description in the safety analysis report or the application, should be used to aid in this determination. Examine the procedure and check-off sheets to determine if valve lineup, or other similar requirements, appear correct for the calibration activity and the return of the component to service.
- 4. During the review of raw data calibration records, determine whether "as-found-settings" are also recorded. Determine whether trip points of components selected conform to applicable license/certificate requirements.
- 5. Review the qualifications of individuals having responsibility for performing calibrations against applicant or licensee requirements and the company policy regarding personnel qualification requirements.
- 6. For gauges, instruments, or other measuring/testing devices used as primary standards in the calibration of plant equipment, determine whether:
 - (a) Accuracy is traceable to the National Bureau of Standards or other independent testing organization.
 - (b) Storage and control of the selected devices is proper.
 - (c) Information tagged on the testing equipment conforms to that in calibration records.
 - (d) The M&TE was in calibration at the time of use.
 - (e) The M&TE is calibrated against standards that have an accuracy that is better than or equal to the instrument being calibrated.
- c. Criticality Alarm Monitoring Systems
 - 1. By observation, discussion, and document review, determine whether the system is designed to permit component and system operability testing periodically and after maintenance. Determine whether maintenance and testing of the entire alarm system are done and that such tests are announced.

2. The criticality accident alarm system is expected to be designed to permit component and system operability testing periodically and after maintenance. The applicant or licensee is expected to have procedures in place to require tests and checks equivalent to the initial installation tests following significant modification or repair to the system.
3. Determine by observation, discussion, and document review that the audibility of the criticality alarm signal was above background noise level, as specified in applicable American National Standards Institute standards or other regulatory requirements, throughout all areas to be evacuated or that other signals, such as lights or beacons, provide operator warning.
4. All tests and corrective actions should be recorded. Maintenance, surveillance, and test records for the alarm system are expected to be maintained.

03.04 Audits (Inspection Requirement 02.04)

- a. Determine if applicant or licensee is required to conduct audits or self-assessments. Select internal or contracted audits performed since the previous inspection and examine the records documenting selected audits to determine whether there was a written plan for the audit, the audit adequately reviewed the audited area, appropriate corrective actions were taken whenever deficiencies were found, and whether there was a check of the effectiveness of the corrective action.
- b. Determine by interviewing the applicant's or licensee's representatives, how the applicant or licensee assures the effectiveness of audits, such as by use of contractor audits, use of a secondary (or follow-up) audit system on a periodic basis, conducted by a member of management or a senior technician not directly responsible for the system audited.
- c. Determine if safety significant audit findings are being tracked through completion by the corrective action program, if required.

03.05 Training (Inspection Requirement 02.05)

Review area-specific training to ensure that the following topics are included, as appropriate:

- a. IROFS, process safety information elements (e.g., safety and health hazards, relevant material safety data sheets, personal protective equipment, etc.)
- b. safe work practices (e.g., confined space entry, lockout/tag-out procedures, opening process equipment, hot work, control of entry into hazardous areas, etc.)
- c. process technology (as required)
- d. operating procedures for all phases of operation
- e. emergency procedures (e.g., Hazard Waste Operations and Emergency Response)
- f. reporting unusual events or non-routine operations

Note: On-the-job training should, as a minimum, include the following: equipment familiarization, completing log sheets, equipment startup/shutdown activities, limiting operating conditions, control of process variables, and applying operating procedures in the field.

03.06 Organizational Structure (Inspection Requirement 02.06)

- a. By discussions with applicant's or licensee's staff and management, and review of documentation, determine whether the applicant's or licensee's organizational structure is in accordance with the application or license. By discussions with selected applicant or licensee managers who are new to their positions since the last inspection, and where appropriate, review of documentation, determine whether these managers meet the training and experience requirements for their positions as specified in the application or license.
- b. Focus on whether the qualifications of involved plant staff meet the requirements of the application or license, including years of relevant experience, educational background, and training required for the newly assigned responsibilities. Examine changes in organization and organizational structure regarding changes in personnel, qualifications of personnel, functions, responsibilities, and/ or authorities.
- c. If no significant changes have occurred in the organization since the previous inspection, then limit time spent on this section.

03.07 Maintenance Problem Identification and Resolution (Inspection Requirement 02.07)

- a. As it relates to maintenance and surveillance, select a sample of problems documented by the applicant or licensee and determine whether the corrective actions were timely and appropriate. Also, determine whether the applicant or licensee has an information tracking and trending system for the availability and reliability of safety controls and IROFS. Determine whether the applicant or licensee utilizes such a system to perform preventative maintenance for risk-significant safety equipment. Review the records of safety controls or IROFS that have degraded or declined in performance over time. Review the applicant's or licensee's identification of the causes of the problems and the maintenance and/or surveillance actions taken for corrective action.
- b. 10 CFR Part 70 licensees are required to maintain records of IROFS or management measures that have failed to perform their function upon demand or have degraded such that the performance requirements are not satisfied. These records should be readily retrievable and inspected. These records should identify the IROFS or management measure that has 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 function, 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. A failure 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. (10 CFR70.62(a)(3)).

88201.B-04 RESOURCE ESTIMATE

The resource estimate for completing this appendix is dependent on the specific facility and will be as determined in the PIP for the facility. Details on the resource estimates are identified in IP 88201, Section 04, "Resource Estimate."

88201.B-05 PROCEDURE COMPLETION

Procedure completion is dependent on the specific facility and will be as determined in the PIP for the facility.

88201.B-06 REFERENCES

IMC 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program"

Center for Chemical Process Safety, "Guidelines for the Technical Management of Chemical Process Safety, American Institute of Chemical Engineers," New York, 1989, Chapter 8, Process and Equipment Integrity, pp. 85 - 97

Center for Chemical Process Safety, "Plant Guidelines for Technical Management of Chemical Process Safety, American Institute of Chemical Engineers," New York, 1992, Chapter 8, Process and Equipment Integrity, pp. 149 - 198

10 CFR Part 70, "Domestic Licensing of Special Nuclear Material," 10 CFR 70.61, "Performance Requirements"

Occupational Safety and Health Administration "Process Safety Management of Highly Hazardous Chemicals"

29 CFR 1910.119 (j), "Mechanical Integrity"

END

List of Attachments:

Attachment 1: Revision History for IP 88201 Appendix B

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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)
	ML25010A399 06/20/25 CN 25-018	Initial issuance. Initial Issue to provide guidance for the Management Measures inspections of Fuel Facilities licensed under Part 70.	N/A	N/A