



# U.S. NUCLEAR REGULATORY COMMISSION

## STANDARD REVIEW PLAN

### 13.5.1.1 ADMINISTRATIVE PROCEDURES - GENERAL

#### REVIEW RESPONSIBILITIES

**Primary** - Organization responsible for the review of human performance

**Secondary** - None

#### I. AREAS OF REVIEW

Plant administrative procedures, as described in the safety analysis report (SAR), are reviewed. This SAR section should describe the procedures that provide for administrative control over safety-related activities for the operation of the facility. In general, the SAR is not expected to include detailed written procedures. It is recognized that the development of detailed procedures and associated training materials may be beyond the scope of the application, are the responsibility of a combined license (COL) applicant, and will be verified through the Construction Inspection Program. The SAR should contain a target date for completion of operating procedures prior to fuel load to allow sufficient time to allow for plant staff familiarization and to allow NRC staff adequate time to review the procedures and to develop operator licensing examinations. The application should describe the nature and content of procedures as detailed below. The specific areas of review are as follow:

The specific areas of review are as follows:

1. Administrative procedures reviewed are those for (A) which provide the administrative controls and (B) those for control of operational activities of the plant staff. Parts (A) and (B) describe the type of procedures that are included in the review.

March 2007

#### USNRC STANDARD REVIEW PLAN

This Standard Review Plan, NUREG-0800, has been prepared to establish criteria that the U.S. Nuclear Regulatory Commission staff responsible for the review of applications to construct and operate nuclear power plants intends to use in evaluating whether an applicant/licensee meets the NRC's regulations. The Standard Review Plan is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations.

The standard review plan sections are numbered in accordance with corresponding sections in Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)." Not all sections of Regulatory Guide 1.70 have a corresponding review plan section. The SRP sections applicable to a combined license application for a new light-water reactor (LWR) are based on Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."

These documents are made available to the public as part of the NRC's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Individual sections of NUREG-0800 will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience. Comments may be submitted electronically by email to [NRR\\_SRP@nrc.gov](mailto:NRR_SRP@nrc.gov).

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A. Category (A) - Controls

- (i) Procedure review and approval
- (ii) Equipment control procedures
- (iii) Control of maintenance and modifications
- (iv) Fire protection procedures
- (v) Crane operation procedures
- (vi) Temporary changes to procedures
- (vii) Temporary procedures
- (viii) Special orders of a transient or self-cancelling character

B. Category (B) - Specific Procedures

- (i) Standing orders to shift personnel including the authority and responsibility of the shift supervisor, senior operator in the control room, control room operator, and shift technical advisor.
- (ii) Assignment of shift personnel to duty stations and definition of "surveillance area"
- (iii) Shift relief and turnover
- (iv) Fitness for duty
- (v) Control room access
- (vi) Limitations on working hours
- (vii) Feedback of design, construction, and applicable important industry and operating experience
- (viii) Shift supervisor administrative duties
- (ix) Verification of correct performance of operating activities

2. COL Action Items and Certification Requirements and Restrictions. For a DC application, the review will also address COL action items and requirements and restrictions (e.g., interface requirements and site parameters).

For a COL application referencing a DC, a COL applicant must address COL action items (referred to as COL license information in certain DCs) included in the referenced DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.

## Review Interfaces

Other SRP sections interface with this section as follows:

1. The reviewer coordinates as necessary to ensure that any special criteria for procedural controls governing testing and operational procedures are met.

The specific acceptance criteria and review procedures are contained in the referenced SRP sections.

## II. ACCEPTANCE CRITERIA

### Requirements

Acceptance criteria are based on meeting the relevant requirements of the following Commission regulations:

Acceptance criteria are based on the relevant requirements of 10 CFR 50.40(a) and 10 CFR 50.40(b) as to administrative procedures in the determination whether the applicant is technically qualified to engage in licensing activities, and 10 CFR 50.54(l) as to the applicant's designation of individuals responsible for directing the activities of licensed operators.

Administrative Procedures - General. The available staff positions subject to this SRP section are as follow. (Note: where regulatory guides (RGs) are referenced, the current issue of the guide at the time of the review is used).

1. 10 CFR 26
2. 10 CFR 50.34(f)(3)(i)
3. 10 CFR 50.40(a) and (b)
4. 10 CFR 50.54(l)
5. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."
6. Regulatory Guide 1.114, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit."
7. NUREG-0694, "TMI-Related Requirements for New Operating Licenses."
8. NUREG-0711, "Human Factors Engineering Program Review Model."
9. NUREG-0737, "Clarification of TMI Action Plan Requirements."
10. ANSI/ANS 3.2-1982, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."
11. Administrative procedures should conform with the rules of practice described in American National Standards Institute/American Nuclear Society (ANSI/ANS) 3.2, Section 5.2, as endorsed by RG 1.33.

12. Administrative procedures for designating individuals responsible for directing the activities of licensed control room operators should comply with 10 CFR 50.54(l). The process for defining and assigning the responsibilities of control room supervisors and operators should comply with NUREG-0694, "TMI-Related Requirements for New Operating Licenses," Items I.A.1.2 and I.C.3.
13. The administrative procedures for shift relief and turnover should comply with NUREG-0694, Item I.C.2.
14. Administrative controls requiring supervisors and operators to be present in the control room, with designation of a specific area within the control room as the "surveillance area" should comply with RG 1.114.
15. Administrative controls designating of a specific area within the control room as the "surveillance area," should conform to guidance provided in Regulatory Guide 1.114.
16. Control room access should conform to the guidance described in NUREG-0694, Item I.C.4.
17. Administrative procedures for the feedback of operation, design, and construction information should comply with 10 CFR 50.34(f)(3)(i) and with the guidance of NUREG-0737, Task Action Plan Item I.C.5.
18. The administrative procedure for verifying the correct performance of operating activities should comply with the guidance of NUREG-0737, I.C.6.
19. Administrative controls governing crane operations must include a requirement that the operators of cranes over fuel pools be qualified and conduct themselves in accordance with the guidelines of ANSI B30.2-1976 (Chapter 2-3), "Overhead and Gantry Cranes."
20. A vendor interface program should ensure that vendor information for safety-related components is incorporated into plant documentation as described in Generic Letter 90-03, "Relaxation of Staff Position in Generic letter 83-28, March 20, 1990.

### SRP Acceptance Criteria

Specific SRP acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations are identified within the Requirements section. The SRP is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide acceptable methods of compliance with the NRC regulations.

### Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this SRP section is discussed in the following paragraphs:

1. 10 CFR 50.40(a) and 10 CFR 50.40(b) require that the applicant adhere to certain established standards and be technically qualified to engage in proposed activities.

10 CFR 50.40(a) and 10 CFR 50.40(b) apply to this section as the administrative procedures program contributes to the determination whether an applicant is technically qualified by putting in place necessary controls, policies, and programs for appropriate and controlled activities as required by 10 CFR 50, Appendix A, Criterion 1, and Appendix B, Criterion XI.

These requirements provide assurance that the applicant will adhere to the standards established in the regulation, that the applicant is technically qualified to engage in and support proposed activities and that safety-related activities are controlled administratively by adequate procedures.

2. 10 CFR 50.54(l) requires that the applicant designate individuals licensed as senior operators to be responsible for the activities of licensed operators.

10 CFR 50.54(l) applies to this section because the administrative procedures program provides control and guidance for individuals who conduct licensed activities and ensures that they are qualified and fit for these duties.

These requirements provide assurance that only licensed individuals who are qualified and fit are assigned to, and conduct, licensed activities.

3. 10 CFR 26 requires that the applicant adhere to the requirements and standards for the establishment and maintenance of the fitness-for-duty program.

10 CFR 26 applies to this section because the administrative procedures program contributes to the determination whether an applicant is technically qualified by putting in place necessary controls, policies, and programs to ensure that individuals performing work are fit to perform the task assigned.

### III. REVIEW PROCEDURES

The reviewer will select material from the procedures described below, as may be appropriate for a particular case.

These review procedures are based on the identified SRP acceptance criteria. For deviations from these acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

Review the applicant's program for the development of administrative procedures to ensure application of accepted human factors principles and practices for the design of the operating procedures. NUREG-0711, "Procedure Development," describes an acceptable method for developing operating procedures. The procedure development method is an integral part of the human factors engineering (HFE) program. The HFE program is more fully described in Chapter 18 of the SRP.

The review under this SRP section consists of a detailed comparison of the information submitted with the acceptance criteria of subsection II of this SRP section as applicable to the SAR. When the reviewer determines, from the applicant's SAR statements, that each of these criteria has been satisfied, the review under this SRP section is complete.

This detailed comparison form of review applies to items for which acceptance criteria are defined in subsection II of this SRP section. For items remaining (primarily those providing operational controls), the reviewer must use judgment whether the applicant provides adequate controls.

For review of a DC application, the reviewer should follow the above procedures to verify that the design set forth in the final safety analysis report (FSAR) meets the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). The reviewer should also consider the appropriateness of identified COL action items. The reviewer may identify additional COL action items; however, to ensure these COL action items are addressed during a COL application, they should be added to the DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit (ESP) or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

For review of both DC and COL applications, SRP Section 14.3 should be followed for the review of ITAAC. The review of ITAAC cannot be completed until after the completion of this section.

#### IV. EVALUATION FINDINGS

The reviewer verifies that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's safety evaluation report. The reviewer also states the bases for those conclusions.

The staff concludes that the administrative procedures are acceptable and contribute to meeting the requirements of 10 CFR Part 26, 10 CFR 50.40(a), 10 CFR 50.40(b), and 10 CFR Part 50.54(l). These conclusions are based on the following findings:

The applicant has described the program and procedures for administrative controls over safety-related activities including the preparation, review, and approval of plant operating procedures, the responsibility and duties of shift personnel, shift relief and turnover procedures, fitness-for-duty program, limitations on working hours, access to the control room, feedback of operating information to plant personnel, and the procedure for verifying correct performance of operating activities. We have reviewed these provisions and find they meet the staff guidance described in ANSI/ANS 3.2, section 5.2, in RG 1.33, and Task Action Plan Items I.A.1.2, I.A.1.3, I.C.2, I.C.3, I.C.4, I.C.5, and I.C.6, and the guidelines of ANSI B30.2.

In addition, the implementation of the administrative procedures program supports the finding required by 10 CFR 50.40(b), i.e., that the applicant is technically qualified to operate a nuclear power plant.

For DC and COL reviews, the findings will also summarize the staff's evaluation of COL action items relevant to this SRP section.

#### V. IMPLEMENTATION

The staff will use this SRP section in performing safety evaluations of DC applications and license applications submitted by applicants pursuant to 10 CFR Part 50 or 10 CFR Part 52. Except when the applicant proposes an acceptable alternative method for complying with

specified portions of the Commission's regulations, the staff will use the method described herein to evaluate conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications submitted six months or more after the date of issuance of this SRP section, unless superseded by a later revision.

## VI. REFERENCES

1. 10 CFR 50.34, "Contents of Applications; Technical Information"
1. 10 CFR 50.40, "Common Standard."
2. 10 CFR 50.54, "Conditions of Licenses."
3. 10 CFR 26, "Fitness for Duty Programs."
4. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."
5. Regulatory Guide 1.114, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit."
6. NUREG-0694, "TMI-Related Requirements for New Operating Licenses."
7. NUREG-0711, "Human Factors Engineering Program Review Model"
8. NUREG-0737, "Clarification of TMI Action Plan Requirements."
9. ANS 3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."
10. Generic Letter 82-02, "Nuclear Power Plant Staff Working Hours," February 8, 1982.
11. Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," June 15, 1982.
12. Generic Letter 83-14, "Definition of 'Key Maintenance Personnel' (Clarification of Generic Letter 82-12)," March 7, 1983.
13. Generic Letter 89-23, "NRC Staff Responses to Questions Pertaining to Implementation of 10 CFR Part 26," October 23, 1989.
14. Generic Letter 90-03, "Relaxation of Staff Position in Generic letter 83-28," March 20, 1990.
15. Generic Letter 91-16, "Licensed Operators' and other Nuclear Facility Personnel Fitness for Duty," October 3, 1991.
16. NRC Policy Statement, "Nuclear Plant Staff Working Hours" (46 FR 23836), June 1, 1982.

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**PAPERWORK REDUCTION ACT STATEMENT**

The information collections contained in the Standard Review Plan are covered by the requirements of 10 CFR Part 50 and 10 CFR Part 52, and were approved by the Office of Management and Budget, approval number 3150-0011 and 3150-0151.

**PUBLIC PROTECTION NOTIFICATION**

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

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