

IMC 2600 Appendix B NRC Core Inspection Requirements Tables 1 and 2

PURPOSE

THIS APPENDIX IDENTIFIES THE NRC CORE AND RESIDENT INSPECTION REQUIREMENTS FOR EACH TYPE OF FUEL FACILITY BY INSPECTION PROCEDURE.

Table 1

| Function/Program Areas | Procedure or Procedure Suite | Facility Type | | | | | | | | | |
|------------------------|-------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|
| | | Category 1 | | Cat III U Fuel Fabrication | | GDP | | Uranium Conversion | | Gas Centrifuge Facility | |
| | | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) |
| SAFETY OPERATIONS | | | | | | | | | | | |
| Plant Operations | 88020 (OPR) | Annual | 24 | Annual (2 per year) | 60 | Annual | 24 | Annual (2 per year) | 60 | Annual (2 per year) | 60 |
| | 92702 (Enforcement Follow-up) | As Needed | ---- | As Needed | ---- | As Needed | ----- | As Needed | ---- | As Needed | ----- |
| Criticality Safety | 88015 (NCS) | Annual (3 per year) | 79.5 | Annual (2 per year) | 29.5 | Annual (2 per year) | 59.5 | – | – | Annual (2 per year) | 27.5 |
| | 88016 (NCS Evaluations) | Annual (3 per year) | 112 | Annual (2 per year) | 34 | Annual (2 per year) | 68 | – | – | Annual (2 per year) | 36 |
| | 88017 (NCS Alarm Systems) | Annual | 0.5 | Annual | 0.5 | Annual | 0.5 | – | – | Annual | 0.5 |
| Fire Protection | 88055 (FPA) | Annual unless 88054 is performed | 32 | Annual unless 88054 is performed | 32 | Annual unless 88054 is performed | 32 | Annual unless 88054 is performed | 32 | Annual unless 88054 is performed | 32 |
| | 88054 (FPT) | Triennial* | 90 | Triennial* | 90 | Triennial* | 90 | Triennial* | 90 | Triennial* | 90 |

*Note: The triennial inspection (88054) references portions of 88055, but all inspection time will be charged to 88054.

Table 1 (Cont'd)

| Function/Program Areas | Procedure or Procedure Suite | Facility Type | | | | | | | | | |
|--|--------------------------------|----------------------|----------------------------------|----------------------------|----------------------------------|----------------------|----------------------------------|----------------------|----------------------------------|-------------------------|----------------------------------|
| | | Category 1 | | Cat III U Fuel Fabrication | | GDP | | Uranium Conversion | | Gas Centrifuge Facility | |
| | | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) |
| SAFEGUARDS | | | | | | | | | | | |
| MC&A | Procedures as in IMC 2683 | 2 | 152-196 | Annual | 54-72 | Annual | 62-84 | – | – | Annual | 62-84 |
| Physical Protection | HEU Access Controls (PS1) | Annual | 40 | – | – | – | – | – | – | ----- | ----- |
| | HEU Alarms and Barriers (PS2) | Annual | 40 | – | – | – | – | – | – | ----- | ----- |
| | HEU Other Security Areas (PS3) | Annual | 50 | – | – | – | – | – | – | ----- | ----- |
| | LEU Security (PS4) | – | – | Triennial | 16 | Triennial | 16 | Triennial | 24 | Triennial | 16 |
| | Transportation Security (PS5) | Triennial | 8 | Triennial | 8 | Triennial | 8 | – | – | Triennial | 8 |
| Classified Material and Information Security | TBD | | | | | | | | | | |

Table 1 (Cont'd)

| Function/Program Areas | Procedure or Procedure Suite | Facility Type | | | | | | | | | |
|--|--|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|
| | | Category 1 | | Cat III U Fuel Fabrication | | GDP | | Uranium Conversion | | Gas Centrifuge Facility | |
| | | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) |
| RADIOLOGICAL CONTROLS | | | | | | | | | | | |
| Radiation Protection | 88030 (RP) | Biennial with annual subsections | 64 | Biennial with annual subsections | 64 | Biennial with annual subsections | 64 | Biennial with annual subsections | 64 | Biennial with annual subsections | 64 |
| Environmental Protection | 88045 (Effluent Control and Environmental) | Annual | 32 | Annual | 32 | Annual | 32 | Annual | 32 | Annual | 32 |
| Waste Management | 88035 (WM) | Biennial | 32 | Biennial | 32 | Biennial | 32 | Biennial | 32 | Biennial | 32 |
| Transportation | 86740 (T) | Biennial | 30 | Biennial | 30 | Biennial | 30 | Biennial | 30 | Biennial | 30 |
| FACILITY SUPPORT | | | | | | | | | | | |
| Maintenance/ Surveillance | 88025 (MS) | ---- | ----- | Annual | 30 | ----- | ---- | Annual | 30 | Annual | 30 |
| Training | 88010 (OT) | As Needed | ---- | As Needed | ---- | As Needed | ---- | As Needed | ---- | As Needed | ---- |
| Emergency Preparedness | 88050 (EP) | Annual | 32 | Annual | 32 | Annual | 32 | Annual | 32 | Annual | 32 |
| | 88051 (Exercise Observation) | Biennial | 48 | Biennial | 48 | Biennial | 48 | Biennial | 48 | Biennial | 48 |
| Permanent Plant Modifications | 88070 | Annual | 40-120* | Anunal | 40-120* | Annual | 40-120* | Annual | 40-120* | Annual | 40-120* |
| Management Organization and Controls | 88005 (MO) | As Needed | ---- | As Needed | ---- | As Needed | ---- | As Needed | ---- | As Needed | ----- |
| Corrective Action Programs for Fuel Cycle Facilities | 88XXX | As Needed | ---- | As Needed | ---- | As Needed | ---- | As Needed | ---- | As Needed | ---- |

*Note: The actual planned inspection hours will depend on information developed from routine inspections, changes to the ISA Summary, discussions with Project Inspectors and staff, etc.

Table 2

| Function/Program Areas | Procedure | Facility Type | |
|--------------------------------------|---------------|--------------------------------|--------------------------------|
| | | Category I | GDP |
| | | Direct Inspection Effort (hrs) | Direct Inspection Effort (hrs) |
| GDP SAFETY OPERATIONS | | | |
| Plant Operations | 88100 (OPNS) | - | 766 |
| Surveillance Operations | 88102 (SURV) | - | 20 |
| Maintenance Observations | 88103 (MAINT) | - | 40 |
| Management Organization and Controls | 88105 (MO&C) | - | 24 |
| CATEGORY I SAFETY OPERATIONS | | | |
| B&W NOG Operations | 88135 | 752 | - |
| NFS Operations | 88135 | 1504 | - |

1. Resident inspection activities are conducted over the course of the year at the frequency and in the manner described in the relevant inspection procedure.
2. Hours listed are for planning purposes and may vary by $\pm 10\%$. If variance is more than 10%, the difference must be explained and the hours reviewed.

END

Revision History Table for IMC 2600 Appendix B

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Description of Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
|----------------------------|---|---|--|--|
| N/A | 04/26/07 CN-07-014 | Revised to incorporate the new inspection procedures developed to address changes to 10 CFR Part 70 and to reflect enhancements made to the fuel facility inspection program. | N/A | ML070610109 |
| N/A | 08/15/07 CN-07-025 | Remove 'OFFICIAL USE ONLY - SENSITIVE INTERNAL INFORMATION' designation from entire manual chapter to make publicly available. (1) Revised to correct estimated resources per year for Plant Operations [Cat. III and Uranium Conversion], MC&A [Cat I], and Radiation Protection [Cat. I]; (2) Revised to delete Procedure 84900, 'Low Level Waste.' The procedure was combined into Procedure 88035, 'Waste Management.' | N/A | ML072070181 |
| N/A | 03/21/08 CN 08-011 | Revised to incorporate Gas Centrifuge Facility inspections into the fuel facility inspection program A | N/A | N/A |
| N/A | 01/27/10 CN 10-003 | Revised to incorporate Gas Centrifuge Facility inspections into the fuel facility inspection program. | N/A | N/A |
| N/A | ML112720197 11/07/11 CN 11-028 | Revised to incorporate revised hours of IP 88015 and 88017. | N/A | ML112720208 |

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Description of Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
|----------------------------|---|--|--|---|
| N/A | ML13311A662 02/07/14 CN 14-005 | <p>Significant revision to:</p> <ul style="list-style-type: none"> Deleted Cat III Fuel Assembly Facility Type as FCSS & DFFI no longer has this type of facility in its jurisdiction. Revised to include adjustment to Gaseous Diffusion Plant resident inspection hours as described in ML12284A329. Revise to make total core hours for Gaseous Diffusion Plant consistent with the core hours described in ML12284A329. Removed Operator Training hours and made it "as needed." Changed MC&A hours to reflect the sum of estimated hours in the IPs. Removed Management Organization and Controls hours and frequency as inspections requirements were transferred to other IPs. Made this IP "as needed." Updated IP 88054 and 88055 inspection hours. All inspection hours will be charged to the triennial procedure every three years. The triennial inspection hours have been increased to reflect that 88055 will not be charged during this 3rd year. Reduced the Radiation Protection (88030) inspection hours to be performed at the Category 1 fuel facilities. This reduction allows for the same resource allocation as the Category 3 and Conversion facilities. The evaluation for this change included the safety significance of the | N/A | ML13347A907 |

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Description of Training Required and Completion Date | Comment and Feedback Resolution Accession Number |
|----------------------------|---|--|--|---|
| | | <p>facilities and the radiation protection evaluations included in 88135.</p> <ul style="list-style-type: none"> • Added new Corrective Action Programs for Fuel Cycle Facilities inspection procedure. • The Environmental Protection, 88045, inspection hours were increased to correspond to the new material included in the inspection procedure revision. • The Waste Management (88035) inspection hours were increased to correspond with the new material included in the inspection procedure revision. The inspection frequency has been reduced to biannual, from annual inspections, due to the amount of waste management activities at the site. • The Transportation inspection procedure (IP 86740) was not revised. The change in hours reflect the current recommendation in hours from the Resource Estimate section of the inspection procedure. The frequency of the IP was changed to biennial, from annual, to keep the total number of inspection hours consistent with the current level of risk for this activity. This change addresses an audit finding which stated that the App B hours should be consistent with the recommended hours of the inspection procedure. <p>The column headings were revised to simplify the chart and to decrease the number of footnotes applicable.</p> | | |