

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 80210

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### ENVIRONMENTAL PROTECTION - INITIAL AND PERIODIC INSPECTIONS

PROGRAM APPLICABILITY: 2502, 2504

#### 80210-01 INSPECTION OBJECTIVES

Through management meetings, program reviews, and work site inspections:

01.01 Inform the licensee of the scope and schedule of the NRC's environmental inspections.

01.02 Assure the licensee has adequate plans and procedures to implement environmental programs required by an Early Site Permit (ESP), a construction permit (CP), or a combined license (COL), or to implement a site redress plan submitted in connect with a limited work authorization (LWA)

01.03 Verify the licensee has implemented environmental programs required for construction work in progress and is complying with the environmental requirements of the ESP, CP, or COL, as applicable.

#### 80210-02 INSPECTION REQUIREMENTS

02.01 Initial Inspection. For multi-unit sites, the management meeting in 02.01a, below, should normally be held one time: prior to the licensing of the first unit on the site. However, additional meetings may be warranted if later units are subject to a different set of requirements than the first units. Inspection requirements 02.01b and c, below, should be carried out for each ESP, CP, or COL.

- a. Management Meeting. Meet the management to discuss NRC's inspection program and the regulatory requirements for environmental protection in the ESP, CP, or COL.
- b. Review of Environmental Program. Inspect the procedures, schedules and other documentation of the program to comply with environmental requirements in the ESP, CP, or COL to determine if the program includes the following aspects:
  1. The program should be documented in the form of directives or procedures.
  2. Responsibilities and authorities should be assigned to specific organizations and individuals.

3. The program should include purchased services, if they are used by the applicant (i.e., contractual labs and organizations).
4. There should be provisions for audits and inspections of activities.
5. Procedures for recognizing and correcting deficiencies.
6. Procedures for recording results of audits.
7. Procedures for reporting results to appropriate supervision for their review and approval and for the purpose of item 5, above.

c. Inspection of Program Implementation

1. Determine by discussions with management (02.01a, above) and review of program documentation (02.01b, above) the status of implementation for each of the requirements and whether the status appears consistent with the construction work in progress.
2. Select one or more of the requirements which the licensee has implemented.
  - (a) Verify the status of implementation as discussed with management, by direct observation at the work site, by examination of the applicant's records of these activities, and by discussion with the individual(s) responsible for the project(s).
  - (b) Determine, for the requirement(s) selected above, if procedures and instructions (necessary to comply with the requirement and specified by the applicant's program) are made available to the organization or individual responsible for implementing the applicant's program for the project.

02.02 Periodic Inspection. The following requirements will be performed every 18 months following completion of the requirements in Section 02.01, above.

- a. Determine, by discussion with management and review of program documentation, the status of program implementation for each of the ESP, CP, or COL requirements. Review the schedule for implementation, the status of projects involved, and results of the applicant's audits and inspections of these activities.
- b. Select three or more of the requirements for which the applicant has implemented control activities or the related project has been initiated.
  1. Verify the status of implementation as discussed with management, by direct observation at the work site and examination of the applicant's records of this activity or project.
  2. Determine, for the requirements selected, if procedures and instructions are available (necessary to comply with the requirement) to the organization or individual assigned the responsibility for implementing the applicant's program for the particular project.

## 80210-03 INSPECTION GUIDANCE

### General Guidance

- a. The inspector should identify the regulatory requirements in the ESP, CP, or COL and, generally by reference, the requirements identified in the NRC's Environmental Impact Statement (EIS). The EIS may reference the Environmental Report (ER) for specific details. Usually, if the ESP, CP, or COL references the EIS, the pertinent activities to be inspected (if made requirements by the ESP, CP, or COL) will be found in Section 4, "Construction Impacts at the Proposed Site," of the EIS. Other requirements (if included in the ESP, CP, or COL) may be summarized in the section of the EIS entitled "Environmental Measurements & Monitoring Programs."
- b. When an LWA-2 is issued, the "Construction Phase" begins at that time, rather than at the time of issuance of the construction permit or combined license.

### Specific Guidance

#### 03.01 Initial Inspection

- a. The regulatory requirements identified by the NRC inspector should be used as the basis for the management discussion and the initial review of the program.

The meeting with corporate and/or plant management should be conducted no later than three months after the notification that (1) site preparation activities will begin in accordance with the terms and conditions identified in the EIS, or (2) either a CP or COL application is being prepared for a site for which an ESP has previously been issued. One purpose for the meeting is for the NRC to review the applicant's plans and schedule for any site preparation activities allowed by an ESP with redress provisions. The second purpose of the meeting is to make licensee management aware of the need for a program to control construction activities in accordance with the ESP and/or COL requirements for limiting the adverse environmental impact of construction. The meeting should focus on the applicant's development and use of a QA type program of administrative and procedural controls to assure compliance with those requirements.

1. During the meeting with management, the inspector should identify the means by which the applicant will implement and control the activities necessary to comply with regulatory requirements stated in the ESP, CP, or COL (and referenced documents). The applicant should have a schedule for implementation of the program according to the status of construction projects for which controls are required to limit adverse environmental impacts, i.e., those projects which relate to the requirements in the ESP, CP, or COL.
2. During this program review, the inspector should also obtain pertinent information (for the purpose of planning and scheduling future inspections) with respect to the scheduling of projects relating to requirements and environmental impacts, and the organizations and contractual services that will be involved in these "environmental activities."

## 80210-04 RESOURCE ESTIMATE

This inspection procedure provides for the review of an applicant/licensee's compliance with environmental protection requirements. Resource estimates for environmental inspections

would be 40 to 160 hours of direct inspection effort. The time would be split into week long inspections with the first inspection at the start of site preparation work and follow-up inspections every 18 months until the plant is completed.

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