

APPENDIX E

INSPECTION PROGRAM MODIFICATIONS DURING A PANDEMIC

1. PURPOSE

To provide guidance on the Agency's expectations on inspection activities during a pandemic and changes allowed to the baseline inspection program because of a pandemic.

2. BACKGROUND

The NRC Pandemic Response Plan (PRP) requires that certain aspects of the inspection program identified as pandemic priority functions (PPF) be maintained to preserve the agency's statutory obligations during a pandemic. Those PPFs include oversight of licensed facilities and materials by such means as adequate resident inspector (RI) coverage at power reactors and evaluation/inspection of emergent and/or imminent safety and security events by either RIs or region-based inspectors. Other portions of the inspection program not classified as PPFs, and thus subject to modification or deferment, include "Supplemental" and "Generic Safety Issue, Special, and Infrequent" inspections.

Consistent with that philosophy and with NRC's mission to verify that facilities are meeting regulatory requirements, the strategy for implementing the PRP uses a graded-approach for adjusting inspection levels and seeks to maintain as much of the normal inspection program as possible under pandemic conditions. While the PRP allows for deferment of the baseline inspection program during a pandemic, the normally scheduled baseline inspection program shall be implemented if reasonably possible.

Additionally, because the pandemic can (1) come on rapidly and (2) move in recurring waves across the country, with various areas of the country affected to various degrees at any one time, the NRC's inspection implementing strategy should emphasize speed and simplicity and allow for flexibility in allowing differences in the baseline inspection program at affected facilities.

3. DISCUSSION

In the event of a pandemic, the following guidance should be followed:

- a. Regional Administrator (RA), with concurrence from the Director of Office of NRR, shall be authorized to make changes to the baseline inspection program at a facility when inspection resources or because of other factors (e.g., availability of hotel/restaurant accommodations near the facility, inability of licensees to support an inspection) are not available to complete the baseline inspection program by the end of the calendar year. The regions are expected to make a reasonable effort to complete the minimum number of samples for each inspection activity.
- b. Regions shall continue to adequately evaluate and respond to events at a facility during the pandemic. If onsite inspections by NRC personnel are not possible then the regions shall collect information on the event remotely.

- c. Generic safety issue and supplemental inspections may be postponed.
- d. During the pandemic, the regions should consider modification to the baseline inspections as follows:
 - Consider postponing inspections performed by regional specialists (see paragraph 08.01 of IMC-2515)
 - Reduce, as appropriate, selected baseline inspections performed by resident inspectors
 - RIs shall continue to perform plant status activities (Appendix D). If RIs are not available at the site, regions shall consider sending region-based inspectors to the facilities, if possible. In the event that no inspectors (RIs or region-based inspectors) are available to monitor licensee activities, the regions shall make arrangements with licensees to obtain information normally obtained through RI's performance of Appendix D.
- e. Site coverage requirement remains in effect during the pandemic (see paragraph 11.01 of IMC 2515). If site coverage requirements cannot be met, regions shall notify Office of NRR and the EDO. In this situation, regions shall make arrangements with the licensee to monitor plant activities remotely.
- f. At the onset of and periodically during the pandemic, the regions should contact the Department of Homeland Security and confirm the ability of affected states to perform their associated emergency response functions.
- g. At the onset of the pandemic and periodically thereafter, the regions shall verify that the licensees have sufficient staffing levels in key positions (e.g., operations, emergency response organization, security).

ATTACHMENT

Revision History - IMC 2515 Appendix E

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	01/26/07 CN 07-004	Initial issuance of Appendix E	NO	N/A	ML063460228