

APPENDIX D

FUEL CYCLE FACILITY INSPECTION PLANNING

ANNUAL INSPECTION PLANNING

Core Inspections.

During the calendar year, inspections should be planned and scheduled to complete the Core Inspections required by this Inspection Manual Chapter (IMC) with any areas of emphasis within the Core Inspections based on Licensee Performance Review (LPR) results.

Supplemental Inspections.

Supplemental inspections, based on LPR decisions, on planned new facilities, recent performance issues, **enforcement actions**, etc., should be included in the Plan.

Inspector Accompaniment Considerations.

Unqualified inspectors and other staff members may accompany qualified inspectors for qualification, familiarization, or other purposes. Accompaniments should not impact annual inspection planning.

PLANNING INDIVIDUAL INSPECTIONS

Elements of Inspection Planning. Planning individual inspections consists of developing an initial plan, coordinating the plan, preparing a written plan, and obtaining supervisory approval of the written plan.

a. Initial Planning.

1. Inspection Procedures. For planning purposes, the inspection procedures contain estimates of inspection hours to complete the procedure. This guidance is the starting point for inspection planning.
2. Recent Safety/Safeguards Inspections (prior two years). Planning should include a review of safety/safeguards inspection reports for trends and issues. A report of current issues [i.e., Reactor Programs System (RPS) or Plant Issues Matrix (PIM)] should also be obtained to facilitate review.
3. LPR Areas Needing Improvement. Specific concerns and safety/safeguards focus should be obtained from the most recent LPR if comments were made in the area of focus. The entire LPR should be reviewed for issues concerning the area of focus. In addition, the licensee's response to the LPR issues should be reviewed.
4. License Requirements. The inspectors should be familiar with any license requirements or safety conditions applicable to the planned inspection and, where applicable, the Integrated Safety Analysis (ISA) Summary.

5. Event History. Inspectors should be familiar with the reportable event history for each facility and should review carefully any event occurring since the last inspection.
6. Improvement Program Items. If a licensee has a safety or safeguards improvement program ongoing, inspectors should review the action items and status.
7. Enforcement Actions. If a licensee has open items or a confirmatory order from a recent enforcement action, inspectors should review the open items and status.

b. Coordination.

1. Technical Reviewer Feedback. Technical reviews should be approached for insight into specific technical issues that may be addressed during the inspection. Technical reviewers may also provide suggestions regarding the risk significance of proposed inspection activities.
2. Resident Inspector Input. If the facility has a Resident Inspector, coordination should be conducted to identify issues and to avoid duplication of inspection effort.
3. Regional Project Inspector Input. Regional fuel cycle staff should be approached for insight into specific licensee issues and the significance of identified issues. Coordination with regional staff will also help to avoid duplication of inspection effort.
4. Project Manager Input. The Project Manager for the facility being inspected should be approached for insight into specific licensing issues, ISA Summary changes, or concerns that can be addressed during the inspection.

- c. Written Plan. Finally, a written plan should be prepared that specifically addresses the selected inspection procedures to be inspected and the focus of the inspection. Maintain the inspection focus on issues with substantive risk significance based on the ten risk bases listed below. Any special requirements identified by line management should be listed.

Risk Focus. For the review areas defined in the inspection procedure, the inspectors develop a risk focus based on the following ten risk bases:

1. Dominant Hazards.
2. Dominant Risks/Scenarios.
3. Dominant Controls for Hazards/Risks.
4. Principle Management Measures.

5. Dominant Root Causes.
 6. Backlog of Risk Significant Issues.
 7. Unexpected Conditions Identified, Resolved, and Corrected.
 8. Recurring Unexpected Conditions and Root Causes.
 9. Internal Self Assessments.
 10. Safety Conscious Work Environment.
- d. Supervisory Approval. Supervisory approval of the written plan is mandatory.

END

ENTRANCE MEETING OUTLINE

Introductory Statement

- Inspection number, members
- NRC coordination (licensing and region)
- Risk focus

Primary Inspection Areas

- Plant operations
- Recent events and internal infractions
- Open items (IFI, VIO, URI)

Coordination with Licensee

- Schedule walkdowns
- Schedule each major inspection area (am or pm)
- Request documentation

Questions

Closing Statement

EXIT MEETING OUTLINE

Introductory Statement

- Inspection number, members
- Reiterate coordination
- Reiterate risk focus

Walkdowns

- Areas reviewed
- Issues identified

Inspection Focus Areas

- Reiterate inspection focus areas
- Review findings area by area
- Discuss any commitments by licensee

Open Items

- Current status of each item

Summary

- Review all new issues (IFI, VIO, URI)
- Review all commitments by licensee

Questions

Closing Statement

ATTACHMENT 1

Revision History for IMC 2600, Appendix D

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment 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. This Appendix was formerly Appendix E in the previous revision of this IMC. Changes that were made to the inspection program led to the removal of Appendix D and changing Appendix E to D.	None	N/A	ML070610222
N/A	08/15/07 CN-07-025	Remove "OFFICIAL USE ONLY - SENSITIVE INTERNAL INFORMATION" designation from entire manual chapter to make publicly available.	None	N/A	ML072070175
N/A	03/21/08 CN 08-011	Revised to add enforcement actions to inspection planning.	None	N/A	N/A