

NRC INSPECTION MANUAL

IRIB

TEMPORARY INSTRUCTION 2515/184

AVAILABILITY AND READINESS INSPECTION OF SEVERE ACCIDENT MANAGEMENT GUIDELINES (SAMGs)

DOCKET

11-IEP-1J

DATE _____

RECD. AUG 01 2011

CORNERSTONE: MITIGATING SYSTEMS

APPLICABILITY: This Temporary Instruction (TI) applies to all holders of operating licenses for nuclear power reactors, except plants which have permanently ceased operations.

2515/184-01 OBJECTIVES

The objectives of this TI are to:

- a. Determine that the severe accident management guidelines (SAMGs) are available and how they are being maintained.
- b. Determine the nature and extent of licensee implementation of SAMG training and exercises.

2515/184-02 BACKGROUND

On March 30, 2011, the Executive Director for Operations chartered a task force to conduct a near-term evaluation of the need for agency actions following the events in Japan. During the task force's deliberations, the importance of severe accident management guidelines (SAMGs) has been highlighted. The SAMGs were implemented as a voluntary industry initiative in the 1990s and are not part of the agency's routine Reactor Oversight Program. In order to evaluate the current status of SAMGs onsite and determine the need for any further recommendations, the task force is requesting the enclosed information regarding SAMGs at operating power reactors be gathered, assessed, and summarized.

2515/184-03 INSPECTION REQUIREMENTS AND GUIDANCE

03.01 Assess the availability and readiness of the licensee's ability to access and implement the SAMGs at their facility. Answer the following questions by filling out the attached datasheet.

- a. When were the SAMGs last updated? Are controlled copies of the SAMG located in the technical support center (TSC) (Y/N), emergency operations facility (EOF) (Y/N), control room (Y/N)? For licensees that use one common EOF for multiple reactor sites, one review of the EOF will serve for all applicable sites.

- b. Are SAMGs covered by the licensee's procedure control and document management system, including the requirements for periodic review and revision (Y/N)?
- c. Does the licensee's configuration control and change management systems (e.g., 10CFR50.59 process) cause the licensee to update SAMGs to reflect design changes (Y/N/Partially – describe)?
- d. Perform a high-level comparison of the site's SAMGs with available industry guidance (e.g., owner's group guidance document and other industry standards as applicable). Are the SAMGs consistent with the owners group guidance (Y/N/comments)?
 - 1. A high-level comparison means that the inspector should determine whether the major sections of the guidance documents are covered. It is not meant to be a step-by-step review of the SAMGs.
 - 2. The owners group guidance documents were normally the basis for the development of the SAMGs, however, other industry standards may also have been used.
 - 3. Some variations from the guidance documents may have been made to accommodate site specific plant design differences.
 - 4. The inspectors should not assess the adequacy of the SAMGs as it is beyond the scope of this TI.
- e. How is training conducted on the SAMGs? Who is trained on the SAMGs? What is the periodicity of training?
 - 1. There are various training methods that may be used by the licensee (e.g., table top exercise, classroom training, reading of training materials).
 - 2. Whichever training method is used the licensee should be able to provide documentation (e.g., training records) that the training was completed.
- f. Interview 4 licensed operators (2 reactor operators and 2 senior reactor operators (shift technical advisor may be substituted for one of the 4 operators), 2 TSC staff, and 2 TSC managers designated to implement the SAMGs during an emergency to determine: (1) did they receive initial (Y/N) and periodic (Y/N/document periodicity) training on the SAMGs and how they relate to their assigned duties, and (2) can they articulate their responsibilities with respect to the use of SAMGs (Y/N/document who would actually implement the licensee's SAMGs)?

- g. Have there been periodic exercises on the use of SAMGs by individuals who would implement them during an emergency (Y/N/document periodicity)?

2515/184-02 REPORTING REQUIREMENTS

The inspection results of this TI should be forwarded by each Region via memorandum to NRR/DIRS/IRIB, Attention: Tim Kobetz. The memorandum should be sent via e-mail to timothy.kobetz@nrc.gov no later than May 27, 2011. Mr. Kobetz can also be reached at (301) 415-1932. The memorandum should be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

In addition, the next quarterly inspection report should document completion of the TI and reference the ADAMS accession number. The inspection results from this TI will be used to aid in determining whether additional NRC regulatory actions are warranted in this area.

2515/184-03 COMPLETION SCHEDULE

This TI is to be initiated upon issuance and completed by May 27, 2011.

2515/184-04 EXPIRATION

The TI will expire on June 30, 2012.

2515/184-05 CONTACT

Any technical questions regarding this TI should be addressed to Tim Kobetz at 301-415-1932 or timothy.kobetz@nrc.gov.

2515/184-08 STATISTICAL DATA REPORTING

All direct inspection effort expended on this TI is to be charged to 2515/184 with an IPE code of TI. All indirect inspection effort expended on this TI for preparation and documentation should be attributed to activity codes TIP and TID respectively.

2515/184-09 RESOURCE ESTIMATE

The estimated average time to complete the TI inspection requirements will be 16-20 hours per site.

END

ATTACHMENTS: Exhibit 1: Template for Inspection Results for TI 2515/184
Attachment 1: Revision History Page

EXHIBIT 1

TABLE OF RESULTS

Letter or Number	Inspection Item	Yes	No	Response/Comments
a	When were the SAMGs last updated?			
	Are controlled copies of the SAMG located in the technical support center (TSC)? (Y/N)			
	Are controlled copies of the SAMG located in the emergency operations facility (EOF)? (Y/N)			
	Are controlled copies of the SAMG located in the control room? (Y/N)			
b	Are SAMGs covered by the licensee's procedure control and document management system, including the requirements for periodic review and revision? (Y/N)			
c	Does the licensee's configuration control and change management systems cause the licensee to update SAMGs to reflect design changes? (Y/N/Partially-describe)			
d	Perform a high-level comparison of the site's SAMGs with available industry guidance (e.g., owner's group guidance document and other industry standards as applicable). Are the SAMGs consistent with the owners group guidance (if any) having been incorporated (Y/N/comments)?			
e	How is training conducted on the SAMGs? Who is trained on the SAMGs? What is the periodicity of training?			
f	Interview 4 licensed operators (2 reactor operators and 2 senior reactor operators), 2 TSC staff, and 2 TSC managers assigned to apply the SAMGs during an emergency to determine:			
	(1) Did they receive initial training on the SAMGs? (Y/N)			
	Did they receive periodic training (Y/N/document periodicity) on the SAMGs and how they relate to their assigned duties?			
	(2) Can they articulate their responsibilities with respect to the use of SAMGs (Y/N/document who would actually implement the licensee's SAMGs)?			
g	Have there been periodic exercises on the use of SAMGs by individuals who would implement them during an emergency (Y/N/document periodicity)?			

ATTACHMENT 1

Revision History for TI 2515/184 Availability and Readiness Inspection of Severe Accident Management Guidelines (SAMGs)

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	ML11115A053 04/29/11 CN 11-008	Researched commitments for 4 years and found none. This is a new document issued for inspections related to the NRC's followup to the Fukushima Daiichi Nuclear Event.	No	N/A	N/A