

# ORGANIZATION AND ADMINISTRATION

## 2.1 PURPOSE OF REVIEW

The purpose of the review of the applicant's organization and administration is to verify that the applicant's administrative policies provide reasonable assurance that the licensee plans, implements, and controls site activities in a manner that ensure the safety of workers, the public, and the environment. The review should also confirm that the qualifications for key management positions are adequate.

## 2.2 RESPONSIBILITY FOR REVIEW

Primary: Licensing Project Manager

Secondary: None

Supporting: Primary reviewers for other SRP Chapters, e.g., technical area chapters and management measures; TWRS Site Representative

## 2.3 AREAS OF REVIEW

The organizational structure and associated administrative program proposed by the applicant, including administrative policies, procedures, and qualifications of key management positions, along with a description of how these are deemed adequate to provide reasonable assurance that the health, safety, and environmental protection (HS&E) functions will be effective, should be reviewed.

The review should address the integration of authorities and responsibilities among the process designers, the architect-engineering firm, the construction contractor, and the plant operator, as applicable, to obtain reasonable assurance that they will function as needed on the HS&E-related tasks.

The review should address how the administrative policies ensure the establishment and maintenance of design and operations. A description of the relationships among major plant safety functions such as the ISA, configuration management, maintenance, quality assurance (QA), training, radiation safety, nuclear criticality safety, fire safety, chemical safety, environmental monitoring, emergency planning, audits and assessments, and incident investigations should be reviewed. The review should also address the applicant's qualification criteria for education, training, and experience for key management positions.

## 2.4 ACCEPTANCE CRITERIA

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### **2.4.1 Regulatory Requirements**

Administrative policies for the effective implementation of HS&E functions concerning the applicant's corporate organization, qualifications of the staff, and the adequacy of the proposed equipment, facilities, and procedures to provide adequate safety for workers, the public, and the environment are required by 10 CFR 70.22, 70.23, and 70.62(d) of Part 70.

### **2.4.2 Regulatory Guidance**

There are no regulatory guides that apply to the organization and administration description for a facility licensed under 10 CFR Part 70.

### **2.4.3 Regulatory Acceptance Criteria**

The application is acceptable if the following criteria are met. Appropriate commitments relevant to these criteria should be included in the applicant's safety program description.

1. The applicant has identified and functionally described the specific organizational groups responsible for designing, constructing and operating the facility. Organizational charts are included in the application.
2. The qualifications, responsibilities, and authorities of key supervisory and management positions with HS&E managers (or similar positions), are clearly defined in position descriptions that are accessible to affected persons and to the NRC, upon request. Clear, unambiguous management control and communications exist among the organizational units responsible for the design and construction of the facility. A corporate officer is responsible for HS&E activities.
3. The personnel to design, construct, and operate the facility have substantive breadth and level of experience and are appropriately available. The qualifications, responsibilities, and authorities for key supervisory and management positions with HS&E responsibilities, including the plant manager, operations manager, shift supervisor, and HS&E managers (or similar positions), are clearly defined in position descriptions that are accessible to all affected personnel and to the NRC, upon request.
4. The applicant has described specific plans to transition from the design and construction phase to operations.
5. In the organizational hierarchy, the HS&E organization(s) is independent of the operations organization(s), allowing it to provide objective HS&E audit, review, or control activities. "Independent" means that neither organization reports to the other in an administrative sense. Both may report to a common manager. Lines of responsibility and authority are clearly drawn.
6. The individual delegated overall responsibility for the HS&E functions has the authority to shut down operations if they appear to be unsafe, and must in that case approve restart of

shutdown operations. Typically, this individual should be at as high a management level as the production or operations manager and have direct line responsibility to the plant manager.

7. The activities essential for effective implementation of the HS&E functions are documented in formally approved, written procedures, prepared in compliance with a formal document control program.
8. The applicant should commit to a simple mechanism for reporting potentially unsafe conditions or activities to the HS&E organization and/or to upper management that is available for use by any person in the plant. Reported concerns are investigated, assessed, and resolved promptly by means of a Corrective Action Program.
9. Effective lines of communication and authority among the organization units involved in the engineering, HS&E, and operations functions of the facility are clearly defined.
10. The applicant has committed to establish formal management measures required to ensure the availability and reliability of items relied on for safety. Management measures and their review are detailed in Chapter 11 of this SRP.
11. Written agreements exist with off-site emergency resources such as fire, police, ambulance/rescue units, and medical services. This is addressed in more detail in Chapter 7, "Fire Safety," and Chapter 8, "Emergency Planning," of this SRP.

Commitments relevant to meeting the acceptance criteria described above are included in the applicant's safety program description.

## **2.5 REVIEW PROCEDURES**

### **2.5.1 Acceptance Review**

The primary reviewer should evaluate the application to determine whether it addresses the "Areas of Review" discussed in Section 2.3, above. If significant deficiencies are identified, the applicant should be requested to submit additional material before the start of the safety evaluation.

### **2.5.2 Safety Evaluation**

After the application is determined to be acceptable for review in accordance with Section 2.5.1, above, the primary reviewer should perform a safety evaluation against the acceptance criteria described in Section 2.4. The objective of the review is to ensure that the corporate-level management and technical support structure, as demonstrated by organizational charts and descriptions of functions and responsibilities, are clear with respect to assignments of primary responsibility. The primary reviewer consults with the TWRS Site Representative to verify that the applicant's management positions are adequately defined in terms of both numbers of persons and their responsibilities, authorities, and required qualifications.

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The supporting reviewers should determine, on the basis of the foregoing, the overall acceptability of the applicant's management system, management qualifications, organizational structure, and administrative procedures. To facilitate the review of the applicant's proposed organization and administration program, the reviewers should examine organization charts, position descriptions, corporate and plant policies, and the descriptions of administrative procedures and guidance documents concerning HS&E. The reviewers should make a determination whether the acceptance criteria of Section 2.4.3 are satisfied and then provide input regarding their findings to the primary reviewer.

The primary reviewer should document the evaluation as described in Section 2.6.

### **2.6 EVALUATION FINDINGS**

After completing the evaluation of material in response to this section, the primary reviewer should write an SER section addressing each topic reviewed under this SRP section and explain why the NRC staff has reasonable assurance that the organization and administration at the facility are acceptable. The SER section should include a summary statement of what was evaluated and the basis for the reviewers' conclusions. License conditions may also be proposed in this SER section to impose requirements where the application is deficient.

The staff can document the evaluation as follows:

*The staff has reviewed the organization and administration for [name of facility] according to the Standard Review Plan Chapter 2.0.*

*The applicant has described (1) clear responsibilities and associated resources for the design and construction of the facility and (2) its plans for management of the project. [Insert a summary statement of what was evaluated and why the reviewer finds the submittal acceptable.] The staff has reviewed these plans and commitments and concludes that they provide reasonable assurance that an acceptable organization, administrative policies, and sufficient competent resources have been established or are committed, to satisfy the applicant's commitments for the design and construction of the facility.*

*In addition, the applicant has described its organization and administrative policies for providing adequate safety management and management measures for the safe operation of the facility. [Insert a summary statement of what was evaluated and why the reviewer finds the submittal acceptable.] The staff has reviewed this information and concludes that the applicant has an acceptable organization, administrative policies, and sufficient competent resources are established to provide for the safe operation of the facility under both normal and abnormal conditions.*

### **2.7 REFERENCES**

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Code of Federal Regulations, *Title 10, Part 70*, "Domestic Licensing of Special Nuclear Material."