

PART 52, TECHNICAL SPECIFICATIONS REVIEW

PROGRAM APPLICABILITY: 2504

71303-01 OBJECTIVES

This is an operational program inspection procedure specified in Inspection Manual Chapter 2504. When this inspection is performed, the majority of construction activities for the plant should have been completed, and the licensee is making preparations for initial fuel loading. The purpose of this procedure is to verify that the licensee has updated and has processes in-place to implement plant technical specification (TS) requirements.

01.01 Verify the TS contains the latest approved TS amendments.

01.02 Verify the licensee has implemented a procedure for assessing degraded or non-conforming conditions adverse to quality or safety (operability determination process).

01.03 Verify the licensee has procedures and processes in-place for performing TS surveillance requirements.

01.04 Verify the licensee has procedures in-place for selected reporting and programmatic requirements required by TS section 5.

01.05 Verify the licensee has procedures and processes to maintain TSs, and they are consistent with the current licensing basis. Specifically, there are procedures to identify TS implications with proposed plant design changes, there are procedures to update TSs for approved amendments, and TS changes are supported in the final safety analysis report (FSAR).

71303-02 INSPECTION REQUIREMENTS AND GUIDANCE

02.01 Requirement. The TSs have been maintained and the plant specific changes have been made.

References: 10 CFR 50.36, applicable 10 CFR 52 Appendix (certified designs), Combined Operating License Application, 10 CFR 50.34.

Inspection Guidance:

- a. Contact the NRC project manager for the plant and obtain the approved TS amendments for the plant from the previous 12 months (or further if necessary to obtain at least six TS amendments).

- b. Perform a line by line check that the amendment sample from 02.01.a has been incorporated into the licensee's TS.

02.02 Requirement. The Licensee's Operability Determination Process and Procedures are acceptable.

References: RIS 2005-020, Appendix B to 10 CFR Part 50.

Inspection Guidance:

- a. Review the licensee's corrective action procedures for controls to identify and resolve degraded or non-conforming conditions related to equipment operability. The corrective action procedures should include provisions for the initial actions to take, and their final resolution.
- b. Review the licensee's procedures for operability determinations on degraded and non-conforming equipment. The procedure should include the technical evaluation process, an extent of condition assessment, an assessment of the ability to perform required safety functions, compensatory measures, and the basis for the determination.
- c. Interview licensed operators to assess if they understand their roles and responsibilities, with respect to operability determinations. This should include initial actions (immediate operability determination), how to apply the TS bases, prompt determinations, and the process to resolve degraded and non-conforming equipment conditions.
- d. Select several corrective action documents associated with TS equipment failures to determine if they were addressed according to the licensee's procedures. If available, routine inspections in this area may be substituted.

02.03 Requirement. TS Surveillances are being performed as required.

Inspection Guidance:

- a. Identify ten surveillance requirements in the TS that are required to be performed with fuel in the reactor vessel. Recommended sections are electrical, instrumentation, and refueling. Have the licensee provide the procedures or identify the process used to meet and document the surveillance requirements.
- b. Request the latest documentation of the selected surveillance activities that have been performed.
- c. Review the documentation obtained in (a.) and (b.) to verify that the surveillance requirements stated in TS have been met. Exceptions or deviations should be reviewed to ensure that TS requirements and definitions are met.

02.04 Requirement. Meet the Programmatic Requirements in TS Section 5.

Reference: 10 CFR 50.36.

Inspection Guidance:

- a. Review the programmatic requirements in Section 5.0, "Administrative Controls." Review a sample of four programs for site implementing procedures and actions to date. Assess whether the sampled programs are successfully meeting the requirements in TS.
- b. Review the reporting requirements in TS and select several required reports for review. Review examples of selected reports. Assess whether the reports are successfully meeting the requirements in TS.

02.05 Requirement. Engineering changes and amendments are managed with respect to the TSs.

References: 10 CFR 50.90, 10 CFR 50.59, 10 CFR 50.34.

Inspection Guidance:

- a. Review the plant 10 CFR 50.59 change process to assure that it contains controls to identify plant changes that have TS implications. These controls should prevent plant changes from being implemented prior to the approval of any required TS changes.
- b. Verify that the licensee has procedures to perform the analysis and revise the FSAR to support TS amendments.

71303-03 GENERAL INSPECTION GUIDANCE

The scope of the inspection should be focused on verifying that the currently approved version of the TS are complete (i.e., there are no outstanding [bracketed] values or information), and that the licensee has processes and procedures for implementing the TS requirements.

The review should compare the technical specification to achieving the requirements specified in the current licensing basis. The goal is to identify programmatic deficiencies or discrepancies within a technical specification indicating poor preparation or technical errors. Systems affected should be checked against the FSAR, TS, and available as-built drawings, including a subsequent walk-down inspection, if applicable. Information on weakness should also be provided to NRO, as it may have generic applicability to other similar plants under construction.

Other Inspection Procedures areas should be reviewed to determine if inspections specified in this procedure have been satisfied. If other Inspection Procedures are used to meet the requirements of this procedure, reference them in the inspection report.

71303-04 RESOURCE ESTIMATES - 80 hrs total

04.01 Initial Preparations. 16 hours.

- a. Contact agency Project Manager (PM) for the licensee to determine status and revision of TS.
- b. Obtain current TS from licensee.
- c. Request process documentation from the licensee.
- d. Review requirements documentation and formulate specific inspection plan.

04.02 The TSs are current and plant specific changes have been made. 4 hrs.

04.03 The Licensee has processes for managing the TSs and maintaining the current licensing basis. 4 hrs.

04.04 The Licensee has an acceptable Operability Determination Process. 16 hrs.

04.05 The Licensee is performing required TS Surveillances. 16 hrs.

04.06 Meet the Programmatic Requirements in TS Section 5. 8 hrs.

04.07 Final write-up of the inspection procedure results. 16 hrs.

71303-05 REFERENCES

References are included in section 71303-02.

71303-06 PROCEDURE COMPLETION

Recommended sample sizes are described as part of each inspection described in section 2, "Inspection Requirements and Guidance." For cases where the term "several" is used, the sample size is two to five items. If the recommended sample size is not available, state that in the inspection write-up and use the samples available.

This inspection procedure can be considered complete when the inspections described in section 2 have been completed and the inspection report has been issued.

END

Attachment

Revision History for IP 71303

Attachment 1

Revision History Sheet for IP 71303

Part 52, Technical Specifications Review

| Commitment Tracking Number | Issue Date | Description of Change | Training Needed | Training Completion Date | Comment Resolution Accession Number |
|----------------------------|-----------------------|---|-----------------|--------------------------|-------------------------------------|
| NA | 10/20/08 CN 08-029 | Initial issue to support inspections of operational programs described in IMC 2504, NON-ITAAC INSPECTIONS Completed 4 year search of CNs and no commitments found. | None | Not Applicable | ML073380022 |
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