

NRC INSPECTION MANUAL

PRPB

INSPECTION PROCEDURE 83522

RADIATION PROTECTION, PLANT CHEMISTRY, RADWASTE, AND ENVIRONMENTAL: ORGANIZATION AND MANAGEMENT CONTROLS

PROGRAM APPLICABILITY: 2513, and 2515

SALP: Radiological Controls

83522-01 INSPECTION OBJECTIVE

To determine whether the licensee is organized, staffed, and motivated to effectively control radiation, radioactive material, and plant chemistry.

83522-02 INSPECTION REQUIREMENTS

02.01 Organization, Responsibilities, and Authorities

- a. Identify and evaluate corporate and plant organizations, organization responsibilities, and organization interfaces related to the control of radiation, radioactive material, and plant chemistry. Verify that they are consistent with commitments made to NRC.
- b. Determine whether the Radiation Protection Manager has adequate responsibility, authority, and management support to ensure effective control of radiation, radioactive material, and plant chemistry.¹
- c. Determine, in view of organization structure and numbers of employees, whether the licensee could be expected to effectively control radiation, radioactive material, and plant chemistry.
- d. Discuss the objective of this inspection with selected members of the above organizations to determine whether a conviction exists that radiation, radioactive material, and plant chemistry will be effectively controlled.

02.02 Staffing. Evaluate management methods used to obtain, train (IP 83522 and 83723), and direct the work of personnel engaged in the licensee's radiation protection, plant chemistry, radwaste, and environmental programs.

¹ In those cases where the Radiation Protection Manager does not have responsibility for plant chemistry, make the determination for the individual who is in charge of plant chemistry.

02.03 Identification and Correction of Weaknesses. Evaluate management methods used to identify and correct weaknesses related to the control of radiation, radioactive material, and plant chemistry.

02.04 Audits and Appraisals. Evaluate corporate and plant audit systems related to the radiation protection, plant chemistry, radwaste, and environmental programs. Determine the qualifications and independence of the auditors.

02.05 Communication to Employees. Review corporate and plant methods of documenting and informing employees of policies, plans, directives, and changes therein, related to the radiation protection, plant chemistry, radwaste, and environmental programs.

02.06 Documentation and Implementation. Verify that the organizations, responsibilities, methods, and systems have been documented and implemented.

83522-03 INSPECTION GUIDANCE

03.01 Organization, Responsibilities, and Authorities

- a. Consider organizational constraints that could affect the plant's ability to control radiation, radioactive material, and plant chemistry. See NUREG-0731, NUREG-0761, Regulatory Guide 8.8, NUREG/CR-1280, Regulatory Guide 1.33, FSAR Chapters 12 and 13, and other pertinent documents and correspondence.
- b. No guidance.
- c. Consider especially the licensee's ability to function during abnormal conditions and the licensee's ability to control onsite contractor activities.
- d. An organization is not likely to function well if its members doubt its abilities.

03.02 Staffing. Consider especially how the licensee plans to satisfy its staffing commitments. Job descriptions may be reviewed to determine whether responsibilities and authorities are appropriately assigned to ensure control of radiation, radioactive materials and plant chemistry.

03.03 Identification and Correction of Weaknesses. Consider methods used to solicit and pursue employee observations and suggestions, such as employee critiques, management troubleshooters, personal contact between management and staff. For example, does the Radiation Protection Manager get into the plant to discuss potential problem areas with employees?

03.04 Audits and Appraisals

- a. Review the Quality Assurance Manual and implementing procedures as they apply to radiation protection, plant chemistry, radioactive waste, and environmental monitoring. Consider the following:
 - 1. Licensee requirements for preparation, review, approval, and use of audit plans and checklists.
 - 2. Management support for the QA program.
 - 3. Independence of auditors.
 - 4. Qualifications and training of auditors.

5. Frequency of audits.
 6. Followup on audit findings.
- b. Review reports of required audits since the last inspection. Look particularly for those audits that probe for programmatic weaknesses and assess the quality of the program. Focus upon licensee followup actions for identified deficiencies. Are corrective actions timely and technically acceptable?

Requirements for reviews and audits normally are contained in the technical specifications. Audit teams should include someone with experience or training commensurate with the scope, complexity, or special nature of the activities audited (Regulatory Guide 1.146 and ANSI/ASME N45.2.23-1978, Section 2.2).

For preoperational inspections, see also FSAR Chapter 13, "Conduct of Operations."

- c. Review reports of other audits, appraisals, assessments, evaluations, etc., that may provide information on program quality.

03.05 Communication to Employees. No guidance offered.

03.06 Documentation and Implementation. Problems in this area should be resolved before the Region recommends issuance of an OL.

83522-04 REFERENCES

Technical Specifications, Section 6, "Administrative Controls."

FSAR Chapters 12, "Radiation Protection," and 13, "Conduct of Operations."

Regulatory Guide 1.8, "Personnel Selection and Training" (endorses ANSI N18.1-1971).

Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)" (endorses ANSI N18.7-1976/ANS 3.2).

Regulatory Guide 8.8, "Information Relevant to Ensuring That Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable."

NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," February 1980.

NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources (Draft)," September 1980.

NUREG-0761, "Radiation Protection Plans for Nuclear Power Reactor Licensees" (Draft for Comment), March 1981.

NUREG/CR-1280, "Power Plant Staffing," January 1980.

ANSI/ANS 3.1-1981, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants" (supersedes ANSI N18.1-1971-77).

ANSI/ANS 3.2-1982, "Administrative Control and Quality Assurance for the Operational Phase of Nuclear Power Plants" (revision and redesignation of ANSI N18.7-1976).

Inspection Procedure 97713, "Quality Assurance Audits."

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