

## **ATTACHMENT 82002.01**

### **FACILITIES AND EQUIPMENT**

#### **82002.01-01 INSPECTION OBJECTIVES**

To verify, during plant construction (and prior to fuel load of the plant), the operational readiness of the facilities and equipment required by the Emergency Preparedness (EP) program and to ensure that the licensee will be able to transition to monitoring under the reactor oversight process.

#### **82002.01-02 INSPECTION REQUIREMENTS**

02.01 Determine the type of EP-related equipment or facilities. Develop an inspection plan for the equipment and facilities.

02.02 Determine whether facilities and equipment meet Nuclear Regulatory Commission (NRC) requirements, are adequately maintained, and are appropriately incorporated into the Emergency Plan. Include licensee communication systems/capabilities in this determination.

02.03 Review any changes to emergency facilities, equipment, instrumentation, and supplies, review the associated Section 50.54(q) analyses and determine whether the changes were a decrease in effectiveness.

02.04 If the new reactor will use the Alert and Notification System (ANS) of a co-located operating reactor, and the physical design of the ANS has been identified as a problem in past inspections, then determine whether the design has been changed since approval of the initial design. Review any approvals of the changes. If the initial physical design or changes are thought to be inadequate, or changes to the design have not been submitted, a determination of the adequacy of the system will require review by personnel qualified in the design of ANS. This effort will be conducted by Federal Emergency Management Agency (FEMA). Management should be informed of the need to initiate discussions with FEMA.

02.05 Based on the review of a representative sample of deficiencies, determine the effectiveness of licensee corrective actions in addressing facilities and equipment issues.

#### **82002.01-03 INSPECTION GUIDANCE**

03.01 This inspection is based on the expectation that the licensee will adequately maintain equipment and facilities. It is expected that a properly functioning EP program will address equipment and facilities problems through the robust drill and critique programs. However, when these processes are inadequate, readiness of equipment and facilities may degrade. The inspection shall include all EP-related equipment within emergency response facilities (ERF) and all other types of EP-related equipment to verify the licensee's operational readiness. Inspection information will be useful in

determining whether the EP program can transition to the reactor oversight process and meet the Cornerstone Performance Expectation and can operate in the green band.

03.02 Requirements for emergency facilities, equipment and supplies are found in 10 CFR 50.47(b), 10 CFR Part 50, Appendix E, Technical Specifications, NUREG-0737, "Clarification of TMI Action Plan Requirements," and Supplement 1 to NUREG-0737, "Clarification of TMI Action Plan Requirements - Requirements for Emergency Response Capability." Essential emergency facilities, equipment, instrumentation, and supplies must be maintained in a state of operational readiness by the licensee. Determination of their status must be accomplished by direct inspection of ERFs, equipment, instrumentation and supplies. Acceptance guidance includes:

- a. ERFs shall be in a state of operational readiness.
- b. Equipment/instrumentation (e.g., radiological survey equipment) must be technically adequate, operable, in calibration, properly maintained and present in appropriate quantities to be considered adequate. The status of emergency preparedness equipment, instrumentation and supplies that support the ERFs will be determined by direct inspection.
- c. Communications systems shall be adequate for ERF operations and operable.
- d. In-plant and onsite data acquisition systems shall be operable and testing records for ERF air cleaning systems should show required surveillance.
- e. A review of dose assessment hardware and software documentation supporting the licensee radiological assessment program shall include the applicable sections of the licensee's Emergency Plan. Elements that shall be reviewed include the following :
  1. A review of the licensee's program for maintenance of dose assessment software models. This would include the Validation and Verification Report, configuration control documents, revision approval chain, and model documentation. Review changes to the model and code for compliance with licensee programs. Review any internal audits of the code and revisions.
  2. The model used by the licensee shall be consistent with models used by offsite authorities. Determine whether the licensee has compared dose models with those of offsite authorities. Where there are significant differences, confirm that the licensee understands the differences and has informed the offsite authorities and the NRC Regional Response Staff of the differences. (Differences in dose calculations in an emergency will have to be explained to offsite decision makers and the press.) A factor of ten difference in the results, or a plume location difference of 30 degrees should not be regarded as a major difference, if the reasons for the differences are understood.

3. The control room normally provides reliable indication of the meteorological variables (specified in Regulatory Guide 1.97) for site meteorology. Verification can be achieved by reviewing the meteorological system maintenance records. In addition, the inspector shall review letters of agreement with the National Weather Service or other service that can provide 24-hour backup information. The relevant procedures should contain the current telephone number for contacting the backup service.

03.03 The inspector shall verify that any changes to emergency facilities and equipment meet NRC requirements and have been appropriately incorporated into the Emergency Plan. Verify that changes were properly assessed under 10CFR 50.54(q). Verify that changes which may affect the licensee's ability to activate them in a timely manner, were properly assessed under 10 CFR 50.54(q). Such changes will include size, location, supplies, internal arrangements, and use during normal operations. Changes made to licensee communication systems/capabilities should be evaluated to ensure that they did not reduce the effectiveness of the Emergency Plan. Offsite communication systems/capabilities recovery plan(s) and onsite repair support for these systems/capabilities will be included in this review.

03.04 No inspection guidance.

03.05 No inspection guidance.

#### 82002.01-04 RESOURCE ESTIMATE

It is estimated that conduct of this attachment will take 40 hours.

END

Exhibit 1

Revision History for IP 82002.01

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	11/08/2011 CN 11-030 ML111040206	Initial issue to support inspections of construction programs described in IMC 2504, Construction Inspection Program: Inspection of Construction and Operational Programs.  Completed 4 year search of historical CNs and found no commitments related to this Inspection Procedure.	None	N/A	N/A