



U.S. NUCLEAR REGULATORY COMMISSION

# STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

## 13.5.2.2 ~~OPERATING AND MAINTENANCE AND OTHER OPERATING~~<sup>1</sup> PROCEDURES

### REVIEW RESPONSIBILITIES

Primary - ~~Procedures and Systems Review Branch (PSRB)~~Quality Assurance and Maintenance Branch (HQMB)<sup>2</sup>

Secondary - None

### I. AREAS OF REVIEW

PSRBHQMB reviews the applicant's plan for development and implementation of ~~operating and~~ maintenance and other operating procedures, not defined in I.A (Areas of Review) of SRP Section 13.5.2.1, as described in the applicant's safety analysis report (SAR). This section of the SAR should describe the maintenance and other<sup>3</sup> operating procedures that will be used by the operating organization (plant staff) to ~~assure~~ ensure<sup>4</sup> that routine ~~operating, off-normal, and emergency activities~~ maintenance, test, and calibration activities, and control of chemical, radiochemical, and radioactive materials<sup>5</sup> are conducted in a safe manner. It is not expected that detailed written procedures will be included in the SAR. It is recognized that development of detailed procedures and associated training materials may be beyond the scope of design certification and then would be the responsibility of a combined license (COL) applicant referencing the certified design.<sup>6</sup> The ~~preliminary safety analysis report (PSAR)~~ should describe ~~preliminary schedules for the preparation of procedures and the final safety analysis report (FSAR)~~ should provide descriptions of the content and development process for procedures as detailed below, including preliminary schedules for the preparation of procedures.<sup>7</sup>

A. ~~The FSAR or other submitted section should describe the different classifications of procedures the operators will use in the control room for plant operations. The group within the operating organization having the responsibility for maintaining the procedure~~

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### USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20555.

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should be identified and the general format and content of the different classifications should be described. It is not necessary that each applicant's procedures conform precisely to the same classification since the objective is to assure that procedures will be available to the plant staff to accomplish the functions contained in the listing of Regulatory Guide 1.33. For example, some licensees prefer a classification of abnormal operating procedures whereas others may use off-normal condition procedures. Examples of classifications follow:

1. System Procedures. Procedures that provide instructions for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation, returning to service following testing (if not contained in the applicable testing procedure), and other instructions appropriate for operation of systems important to safety.
2. General Plant Procedures. Procedures that provide instructions for the integrated operations of the plant, e.g., startup, shutting down, shutdown, power operation and load changing, process monitoring, and fuel handling.
3. Off-normal Condition Procedures. Procedures that specify operator actions for restoring an operating variable to its normal controlled value when it departs from its normal range or to restore normal operating conditions following a transient. Such actions are invoked following an operator observation or an annunciator alarm indicating a condition which, if not corrected, could degenerate into a condition requiring action under an emergency operating procedure (EOP).
4. Emergency Operating Procedures. Procedures that direct actions necessary for the operators to mitigate the consequences of transients and accidents that cause plant parameters to exceed reactor protection system or engineered safety features actuation setpoints.
5. Alarm Procedures. Procedures that guide operator actions for responding to plant alarms.<sup>8</sup>

B. The FSAR<sup>9</sup> should describe how maintenance and other operating procedures are classified, what group or groups within the operating organization have the responsibility for maintaining and performing the duties prescribed in each class of procedures, and the general objectives and characteristics of each class. If their general objectives and characteristics are described elsewhere in the FSAR<sup>10</sup> or application, these may be approximately cited by referenced.<sup>11</sup>

An acceptable procedures classification system for IB<sup>12</sup> is contained in Regulatory Guide 1.33.

C. The FSAR or other submittal should describe the applicant's program for emergency operating procedures (A.4 above) and provides a description of the required content of the applicant's submittal. PSRB will review the applicant's program for development and implementation of the EOPs.

~~A procedures generation package (PGP), for EOPs should be submitted to NRC at least three months prior to the date the applicant plans to begin formal operator training on the EOPs. The PGP should include:~~

- ~~1. Plant-specific technical guidelines (P-STGs). Guidelines based on analysis of transients and accidents that are specific to the applicant's plant design and operating philosophy. The submitted documentation of the P-STGs will provide the basis for and include a reference to generic guidelines if used.~~
- ~~For plants not referencing generic guidelines, this section should contain the action steps necessary to mitigate transients and accidents in a format that allows mitigation without first having diagnosed the specific event, along with all supporting analyses, to meet the requirements of TMI Action Plan Item I.C.1 (NUREG-0737 and Supplement 1 to NUREG-0737).~~
- ~~For plants referencing generic guidelines, the submitted documentation should include (1) a description of the process used to develop plant-specific guidelines from the generic guidelines, (2) identification of significant deviations from the generic guidelines including identification of additional equipment beyond that identified in the generic guidelines, along with all necessary engineering evaluation or analyses to support the adequacy of each deviation, and (3) a description of the process used for identifying operator information and control requirements. Examples of significant safety deviations are provided in Appendix A to this SRP section, subsection 3.3.2.~~
- ~~2. A plant-specific writers guide (P-SWG) that details the specific methods to be used by the applicant in preparing EOPs based on P-STGs.~~
- ~~3. A description of the program for verification/validation (V/V) of EOPs.~~
- ~~4. A description of the program for training operators on EOPs.<sup>13</sup>~~

#### Review Interfaces:<sup>14</sup>

To the extent that operating and maintenance procedures incorporate elements of the program for monitoring the effectiveness of maintenance, they will also be reviewed for compliance with 10 CFR 50.65 under SRP Section 17.4 (proposed).<sup>15</sup>

PSRBHQMB coordinates evaluations by other branches that involve the review of operating and maintenance procedures. If an applicant references or provides unreviewed technical guidelines as the basis for the plant-specific EOPs, PSRB will conduct an initial review of the guidelines.<sup>16</sup> Assistance from other technical review branches will be obtained as necessary to perform a thorough review of the safety-significant deviations.<sup>17</sup> If the unapproved guidelines incorporate significant technical changes from approved guidelines, then the PSRB may request technical review by RSB. RSBThese technical branches<sup>18</sup> will provide develop<sup>19</sup> requests for additional information, if necessary, and will provide safety evaluation report (SER)<sup>20</sup> input to PSRB HQMB.

## II. ACCEPTANCE CRITERIA

Section 13.5.2.2<sup>21</sup> of the SAR constitutes additional evidence of the applicant's technical qualifications, and forms a basis for a key part of the regulatory inspection program. Acceptance is based on meeting the relevant requirements of 10 CFR Part 50.34 as indicated below. Additional guidelines listed in this subsection provide guidance to applicants for meeting basic requirements.

A. Completion of ~~operating and~~ maintenance and other operating procedures. A generally acceptable target date for completion of ~~operating and~~ maintenance and other operating procedures is about six months before fuel loading to allow adequate time for plant staff familiarization ~~and to allow NRC staff adequate time to develop operator license examinations.~~ The PGP for EOPs must be submitted not later than three months prior to the date formal operator training on EOPs is to begin.<sup>22</sup>

~~B. Operating Procedures to be used by licensed operators in the control room. The regulations and staff guidelines applicable to this subsection are as follows:~~

- ~~1. 10 CFR Part 50, §50.34(a)(6) and (10) and §50.34(b)(6)(iv) and (v).~~
- ~~2. NUREG-0737, Clarification of TMI Action Plan, Item I.C.1, Guidance for the Evaluation and Development of Procedures for Transients and Accidents. (Emergency Operating Procedures Only)~~
- ~~3. Supplement 1 to NUREG-0737, TMI Action Plan Items I.C.1 and I.C.9 Requirements for Emergency Response Capability, Item 7, Subsection 7.1 and 7.2, Upgrade of Emergency Operating Procedures. (Emergency Operating Procedures Only)~~
- ~~4. The guidelines in the Regulatory Position Section of Regulatory Guide 1.33.~~
- ~~5. The guidelines of ANSI/ANS 3.2 - 1982, Section 5.3.~~
- ~~6. Appendix A to Standard Review Plan, Section 13.5.2, Guidelines for the Evaluation of Procedures Generation Packages. (Emergency Operating Procedures Only)<sup>23</sup>~~

EB. ~~Other Operating and~~ Maintenance and Other Operating<sup>24</sup> Procedures. The regulations and staff guidelines applicable to this section are as follows:

1. 10 CFR ~~Part 50,~~ §50.34(a)(6) and §10 CFR 50.34(b)(6)(iv): , and the requirements of 10 Part CFR 50, Appendix B, Criteria V and VI.<sup>25</sup>
2. Requirements and guidance contained in 10 CFR 50.34(f)(2)(ii); 10 CFR 50.34(f)(3)(i); TMI items I.C.1, and I.C.5 regarding the development, verification and validation, implementation, and maintenance of revision of plant procedures.<sup>26</sup>

23.<sup>27</sup> The guidelines in the Regulatory Position Section of Regulatory Guide 1.33.

34. The guidelines of ANSI/ANS 3.2 - 1982, Section 5.3.<sup>28</sup>

Technical Rationale:<sup>29</sup>

The technical rationale for application of these acceptance criteria to operating and maintenance procedures is discussed in the following paragraphs:<sup>30</sup>

1. Compliance with the requirements of 10 CFR 50.34(a)(6) and (10) and 10 CFR 50.34(b)(6)(iv) and (v) requires that the applicant include in the SAR preliminary plans for organization, training, conduct of operations (including maintenance, surveillance, and periodic testing), and coping with emergencies.

10 CFR 50.34(a)(6) and (10) and 10 CFR 50.34(b)(6)(iv) and (v) are applicable to this section because they specify in general terms the information to be submitted in the SAR regarding the operating and maintenance procedures program, an important part of the safe conduct of operations for emergency and nonemergency activities.

Meeting these requirements provides assurance that the conduct of operations at the plant will be formalized with procedures covering normal and emergency activities. The planning and implementation of a procedures program will provide means for correct and standardize performance of activities important to safety.<sup>31</sup>

2. Compliance with the requirements of 10 CFR Part 50, Appendix B, Criteria V and VI, requires that activities affecting quality be prescribed by documented instructions, procedures, and drawings and that measures be established to control issuance of and changes to these documents.

10 CFR Part 50, Appendix B, Criteria V and VI, are applicable to this section because they require an applicant to ensure that quality assurance considerations are an integral part of the operating and maintenance procedures program governing the development of technical procedures, V&V, implementation, and document control relative to the safe operation of the facility under routine, off-normal, and emergency operating conditions.

Meeting these requirements provides assurance that activities affecting quality will be satisfactorily controlled.<sup>32</sup>

### III. REVIEW PROCEDURES

Review of the FSAR in accordance with this section ~~consists of a detailed comparison of the information submitted with the acceptance criteria of subsection II above. The PSAR review should encompass only the schedules for procedures development and determination that the applicant commits to follow the applicable Regulatory Guides and Standards, and consists of a detailed comparison of the information submitted with the acceptance criteria of subsection II above.~~<sup>33</sup>

To supplement the expertise of the reviewer, especially in the human factors area, and to promote consistency among the PGP reviews, Appendix A identifies the subjects which should be considered by the reviewer in the evaluation. However, Appendix A is not a "checklist" and each item of Appendix A need not be addressed in the PGP to be acceptable.

Normally the PGP review should be conducted prior to the date the applicant plans to begin formal operator training on the EOPs. If this is not possible because of a delayed submittal, perform an acceptance review of the PGP. Specifically, audit the four parts of the PGP to determine if there are any major deficiencies in the EOP program that warrant postponing operator training. If major deficiencies are found, identify the additional information necessary to conduct the complete PGP review to the Licensing Project Manager so that the applicant can be notified prior to the initiation of training on the EOPs.

Review the PGPs for operating license applicants to determine if the applicant's program meets the requirements of Generic Letter 82-33. The review consists of the evaluation of the four parts of the PGP: The P-STGs, the P-SWG, the description of the program for V&V of the EOPs, and the description of the training program for EOPs necessary to support the conclusions described in Section IV below. To support this review, Appendix A provides additional review guidance.

Review the P-STGs to determine if acceptable analyses of accidents and transients and development of technical guidelines for operator actions applicable to the plant have been completed, and to determine if an acceptable process for identifying operator information and control needs has been described. Instead of being included in the PGP, this process may be described by the applicant in the documentation submitted for staff review in accordance with SRP-18.1, in support of the Detailed Control Room Design Review (DCRDR). The reviewer should coordinate review of this material with the Human Factors Engineering Branch (HFEB). It is expected that most applicants will reference generic technical guidelines.

For an applicant using approved generic technical guidelines as the basis for its P-STG, the major portion of the review of the technical guidelines has been accomplished generically. Staff SERs approving each of the four owners groups' generic technical guidelines for use have been published and may be supplemented as guidelines are revised. To review this type of P-STG, review the process described for converting generic technical guidelines into plant-specific procedures to ensure that the safety-significant deviations from the generic guidelines are controlled. Evaluate the technical adequacy of the identified plant-specific deviations. Finally, evaluate the process for development of the plant-specific information and control requirements necessary to use the EOPs.

The review of identified safety-significant deviations from generic technical guidelines will be conducted to the same level of detail as the generic technical guidelines. Examples of safety-significant deviations are given in Appendix A, Subsection 3.3.2. Assistance from other technical review branches will be obtained as necessary to perform a thorough review of the safety-significant deviations. Only safety-significant deviations need to be reviewed. However, the reviewer will determine that the applicant's program will control this process so that the work is auditable. It is expected that most applicants will control the process by documenting all deviations.

Since B&W plant owners elected to use a lead plant concept rather than generic technical guidelines, each B&W applicant's identified deviations from the lead plant's (Oconee) guidelines will be reviewed.

For applicants not referencing generic technical guidelines, ensure that the submittal includes analysis of accidents and transients in accordance with the guidance of NUREG-0660, and NUREG-0737 Items I.C.1 and I.C.9. To do this, (1) become familiar with the integrated performance of the NSSS and balance of plant systems, (2) evaluate the completeness of the accidents and transients analyzed, (3) evaluate the use of appropriate models, calculational methods, and plant data, (4) consider audit calculations of selected accidents and transients, (assistance from other technical review branches required), (5) evaluate the adequacy of the applicant's program to develop guidelines from the analysis of accidents and transients, (6) test the guidelines against scenarios, including multiple failures, and (7) evaluate the information and control needs of the operators to execute the instructions of the guidelines.

The P-SWG review will consider the adequacy of the methods of presentation of the technical information as EOPs for the intended users of the EOPs (e.g., control room operators, shift supervisors, and auxiliary operators). Review the P-SWG by evaluating the applicant's methods for meeting the overall writer's guide objectives stated in NUREG-0899. Appendix A provides guidance to assist the reviewer in making this evaluation. This guidance is not to be used as strict criteria, but is to be used as an aid in the overall evaluation of the P-SWG. Because strict criteria do not exist for the human factors evaluation, the reviewer must make a professional judgment regarding the adequacy of the applicant's methods as described in the P-SWG.

Review the V/V and training programs by comparing the program descriptions with the objectives of NUREG-0899.

The level of effort for these reviews will vary significantly. For example, the effort necessary to review the P-STG will vary depending on the number, complexity and significance of the plant-specific deviations from the approved generic technical guidelines.

If the review of the PGP does not provide sufficient information to support the conclusions of the Evaluation Findings section, the reviewer should obtain at least one EOP for review. As a product of the EOP program, the EOP(s) would then be additional information for judging the program's acceptability and will provide additional information as to how the applicant's program for development and implementation of EOPs should be modified to ensure that it contains sufficient information to assure acceptability of the resulting EOPs.

When the reviewer has determined that each of the criteria of Section II has been satisfied based upon the statements made by the applicant in the SAR, the review of Section 13.5.2 is complete.

When the reviewer has determined that each of these criteria has been satisfied based upon the statements made by the applicant in the SAR, the review of this SRP section is complete.<sup>34</sup>

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3 (proposed), to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and

acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (proposed) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.<sup>35</sup>

#### IV. EVALUATION FINDINGS

The reviewer verifies that the information presented and his the<sup>36</sup> review support the following type of conclusion, to be used in the staff's safety evaluation report:

The applicant's program for operating and maintenance procedures as described in the SAR is in accordance with 10 CFR 50.34, Regulatory Guide 1.33, and ANSI/ANS 3.2-1982 Section 5.3<sup>37</sup> and is acceptable. ~~The applicant's program for development of EOPs has been reviewed and the staff concludes that:~~

- ~~1. In the area of the technical guidelines:~~
  - ~~(a) The EOPs will be based upon acceptable technical guidelines derived from approved analyses of transients and accidents.~~
  - ~~(b) Implementation of the applicant's described methods for conducting an analysis of the operator's tasks should result in the identification of the instrumentation and controls necessary to perform the tasks specified in the P-STGs.~~
- ~~2. In the area of writer's guidance:~~
  - ~~(a) The writer's guide provides sufficient information to help ensure that EOPs developed using P-STGs will be useable, accurate, complete, readable, convenient to use, and acceptable to control room personnel.~~
  - ~~(b) The methods described by the writer's guide appear sufficient to support upgrading of the procedures and to ensure long-term consistency within and among procedures.~~
- ~~3. Implementation of the described V/V program provides adequate assurance that EOPs are technically correct and useable, follow the writer's guide, correspond to the control room/plant hardware, and are compatible with the minimum number, qualifications, training, and experience of the operating staff.~~
- ~~4. Implementation of the described training program should result in the operator understanding the philosophy behind the approach to the EOPs, understanding the mitigative strategy and technical basis of the EOPs, having a working knowledge of the technical content of the EOPs, and having the capability to execute the EOPs under operational conditions.<sup>38</sup>~~

The evaluation findings for this section should also include the following:



1. A statement that the applicant has committed to operate the plant in accordance with written and approved procedures.
2. A brief description of the categories of procedures to be included.
3. ~~A description of the review conducted to ensure that Supplement 1 to NUREG-0737 Item 7, "Upgrade of Emergency Operating Procedures" has been implemented.~~<sup>39</sup>

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, tests, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.<sup>40</sup>

## V. IMPLEMENTATION

The following is intended to provide guidance to applicants and licensees regarding the NRC staff's plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.<sup>41</sup> Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commissions' regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.<sup>42</sup>

Implementation schedules for conformance to parts of the methods discussed herein are contained in the referenced regulatory guides, NUREGS, and in accordance with the following:

- ~~a. This SRP revision is applicable to all construction permit applicants. Only the guidance pertaining to PSAR contents, i.e., schedules and commitments to follow guidance in appropriate published documents, will be used as review guidance.~~
- ~~b. This SRP revision will be used by the staff for judging the acceptability of Operating Reactor licensees and operating license applicant emergency operating procedure program submittals made in accordance with Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability (Generic Letter 82-33). The review guidance in this SRP section replaces the review guidance contained in Generic Letter 82-33.~~<sup>43</sup>

It is recognized that development of detailed procedures and associated training materials may be beyond the scope of design certification and then would be the responsibility of an OL or COL applicant referencing the certified design.<sup>44</sup>

## VI. REFERENCES<sup>45</sup>

31. 10 CFR ~~Part 50, §~~ 50.34, "Contents of Applications; Technical Information."
2. 10 CFR Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants."
5. ~~NUREG-0737, Clarification of TMI Action Plan Requirements.~~
6. ~~Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability (Generic Letter 82-33, December, 1982).~~
7. ~~NUREG-0899, Guidelines for Preparation of Emergency Operating Procedures.~~
8. ~~Generic Letters 83-05, 83-22, 83-23, and 83-31, Staff Safety Evaluation Reports for Generic Technical Guidelines for GE, CE, W, and B&W plants, respectively.<sup>46</sup>~~
23. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."
4. Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants."
15. ANSI/ANS 3.2 1982, "Standard for Administrative Controls for Nuclear Power Plants," American National Standards Institute.<sup>47</sup>



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**SRP Draft Section 13.5.2.2**  
Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

Item	Source	Description
1.	PRB Comment Resolution	Revised the SRP Section number and title in accordance with PRB comments. The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." <b>The Redline and Strikeout text is relative to the previous version of Section 13.5.2.</b>
2.	PRB Comment Resolution	The HQMB is identified as the PRB for the proposed SRP Section 13.5.2.2.
3.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The text is revised to reflect the scope and PRB responsibilities of SRP Section 13.5.2.2 in accordance with PRB comments.
4.	Editorial	Changed assure to ensure (global for this section).
5.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The text is revised to reflect the scope of SRP Section 13.5.2.2 in accordance with PRB comments.
6.	Integrated Impact No. 1479	Added statement that detailed procedures and training development may be beyond the scope of design certification.
7.	PRB Comment Resolution	The last sentence of the first paragraph is restructured and reference to a PSAR is changed to the more general "SAR" in accordance with PRB comments.
8.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The text associated with operating procedure classification is deleted because this area of review is covered in new SRP Section 13.5.2.1.
9.	PRB Comment Resolution	The reference to a FSAR is changed to the more general "SAR" in accordance with PRB comments.
10.	PRB Comment Resolution	The reference to a FSAR is changed to the more general "SAR" in accordance with PRB comments.
11.	Editorial	Revised sentence for added clarity.

**SRP Draft Section 13.5.2.2**  
Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
12.	PRB Comment Resolution, Editorial	Deleted reference to "IB" since development of the new SRP Section 13.5.2.2 eliminates the need to specify the applicable paragraph.
13.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The text associated with EOP development and guidelines is deleted because this area of review is covered in new SRP Section 13.5.2.1.
14.	SRP-UDP format item	Added "Review Interfaces" to AREAS OF REVIEW.
15.	Potential Impact 25952	Added a Review Interface to new section 17.4 for review of compliance with the Maintenance Rule, 10 CFR 50.65.
16.	PRB Comment Resolution	Revised the Review Interfaces subsection to reflect the scope of the review conducted in new SRP Section 13.5.2.2. Review Interfaces related to EOPs and procedure development guidelines are covered in new SRP Section 13.5.2.1.
17.	SRP-UDP format item	Added information on coordination to make consistent with information in REVIEW PROCEDURES.
18.	PRB Comment Resolution	Revised the Review Interfaces subsection to reflect the scope of the review conducted in new SRP Section 13.5.2.2. Review Interfaces related to procedure development guidelines are covered in new SRP Section 13.5.2.1.
19.	Editorial modification	Changed wording to improve clarity.
20.	Editorial modification	Defined SER as safety evaluation report.
21.	PRB Comment Resolution	Revised the SRP Section number in accordance with PRB comments. The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures."
22.	PRB Comment Resolution	The text is revised to reflect the scope of new SRP Section 13.5.2.2 in accordance with PRB comments.
23.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The Acceptance Criteria associated with EOP development and guidelines is deleted because this area of review is covered in new SRP Section 13.5.2.1.

**SRP Draft Section 13.5.2.2**  
Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
24.	PRB Comment Resolution, Editorial	Rearranged the Acceptance Criteria subheading title to be consistent with the title and other changes to the SRP section.
25.	Integrated Impact No. 1482	Added reference to 10 CFR Appendix B to ACCEPTANCE CRITERIA.
26.	Integrated Impact No. 1481	Added references to 10 CFR 50.34(f), and TMI action items to ACCEPTANCE CRITERIA for other operating and maintenance procedures.
27.	Editorial modification	Renumbered items in list to reflect correct sequence.
28.	Update standard	This standard needs to be updated to the 1994 version if comparison supports update of the citation.
29.	SRP-UDP format item	Added "Technical Rationale" to ACCEPTANCE CRITERIA.
30.	SRP-UDP format item	Added lead-in sentence for "Technical Rationale."
31.	SRP-UDP format item	Added "Technical Rationale" paragraphs for 10 CFR 50.34(a) and (b) requirements.
32.	Integrated Impact No. 1482	Added "Technical Rationale" paragraphs for 10 CFR 50, Appendix B, requirements.
33.	PRB Comment Resolution	Restructured the Review Procedure lead-in paragraph in accordance with PRB comments.
34.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The Review Procedures associated with EOP development and guidelines are deleted because this area of review is covered in new SRP Section 13.5.2.1.
35.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard paragraph to address application of Review Procedures in design certification reviews.
36.	Editorial modification	Replaced "his" with "the."
37.	Update standard	This standard needs to be updated to the 1994 version if comparison supports update of the citation
38.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The Evaluation Findings associated with EOP development and guidelines are deleted because this area of review is covered in new SRP Section 13.5.2.1.

**SRP Draft Section 13.5.2.2**  
Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
39.	PRB Comment Resolution	The PRB proposes to subdivide existing SRP Section 13.5.2 into SRP Sections 13.5.2.1, "Operating and Emergency Operating Procedures," and 13.5.2.2, "Maintenance and Other Operating Procedures." The Evaluation Findings associated with EOP development and guidelines are deleted because this area of review is covered in new SRP Section 13.5.2.1.
40.	SRP-UDP Format Item, Implement 10 CFR 52 Related Changes	To address design certification reviews a new paragraph was added to the end of the Evaluation Findings. This paragraph addresses design certification specific items including ITAAC, DAC, site interface requirements, and combined license action items.
41.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard sentence to address application of the SRP section to reviews of applications filed under 10 CFR Part 52, as well as Part 50.
42.	SRP-UDP Guidance	Added standard paragraph to indicate applicability of this section to reviews of future applications.
43.	PRB Comment Resolution	The Implementation Subsection is revised to delete schedule details associated with EOP development and guidelines because this area of review is covered in new SRP Section 13.5.2.1.
44.	Integrated Impact No. 1479	Added statement that procedures and training materials may be the COL applicant's responsibility.
45.	Editorial modification	Revised REFERENCES section to add new references, modify existing references to correct format, and renumber list to correct sequence.
46.	PRB Comment Resolution	The References Subsection is revised to delete references associated with EOP development and guidelines because this area of review is covered in new SRP Section 13.5.2.1.
47.	Update standard	This standard needs to be updated to the 1994 version if comparison supports update of the citation.
48.	PRB Comment Resolution	Appendix A to SRP Section 13.5.2 is included within new SRP Section 13.5.2.1 and is outside the scope of the review conducted in new SRP Section 13.5.2.2. Therefore it has been deleted from this section.



**SRP Draft Section 13.5.2.2**  
Attachment B - Cross Reference of Integrated Impacts

<b>Integrated Impact No.</b>	<b>Issue</b>	<b>SRP Subsections Affected</b>
1477	Update Standards	Not updated. No staff position to support change.
1479	Revise the section to indicate the detailed procedures and training may be beyond the scope of design certification and thus the responsibility of a COL applicant.	AREAS OF REVIEW, first paragraph  IMPLEMENTATION, paragraph b
1480	Consider identifying specific plant procedures issues detailed in regulatory documents and including such information in SRP 13.5.2	Not Implemented See IPD 13.5.2-3
1481	Consider revising Acceptance Criteria and Review Procedures regarding procedures other than those used in the control room.	ACCEPTANCE CRITERIA, item C.2.
1482	Consider adding citations of 10 CFR 50, Appendix B, Criteria V and VI as acceptance criteria.	ACCEPTANCE CRITERIA, item C.1 Technical Review, item 2
1483	Revise Acceptance Criteria (specific criteria) related to TMI action plan item I.C.9 long-term upgrading of plant procedures.	Not processed
1484	Revise the Acceptance Criteria, Review Procedures, and Evaluation Findings as necessary to incorporate the guidance of the proposed draft Regulatory Guide DG-1001.	Placeholder integrated impact - not processed.
1485	Revise the Acceptance Criteria, Review Procedures, and Evaluation Findings as necessary to incorporate the guidance of the proposed draft Regulatory Guide DG-1035 (formerly DG-1018).	Placeholder integrated impact - not processed.
1486	Revise the Acceptance Criteria, Review Procedures, and Evaluation Findings as necessary to incorporate the guidance of the proposed draft Regulatory Guide RS-902-4 (second proposed revision 3 to RG 1.33).	Placeholder integrated impact - not processed.