ATTACHMENT 88135.17

RESIDENT INSPECTION PROGRAM
PERMANENT PLANT MODIFICATIONS

88135.17-01 INSPECTION OBJECTIVES

The objectives of this procedure are to provide requirements and guidance for evaluating and ensuring that the licensee is implementing its permanent plant modification program.

88135.17-02 INSPECTION REQUIREMENTS AND INSPECTION GUIDANCE

02.01 Annual Permanent Plant Modifications.

a. Inspection Requirement. Verify that licensee plant modification evaluations were performed in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 70.72 and the license application.

b. Inspection Guidance. For the purpose of this inspection, permanent plant modifications include permanent plant changes, design changes, set point changes, procedure changes, equivalency evaluations, suitability analyses, calculations, and commercial grade dedications.

Select plant modifications to be inspected, based on the risk significance of the equipment involved. During the review, evaluate the following:

1. Verify the technical basis for the change.

2. Verify that the licensee evaluated the impact of the change on safety and health or control of licensed material.

3. Verify that modifications affecting the facility design bases; licensing bases, and performance capability of items relied on for safety (IROFS) have been adequately implemented.

4. Verify that the procedures, and the design and licensing basis documentation affected by the change have been adequately updated.

5. Verify that the design and licensing basis documentation used to support the change, and the procedures, and the design and licensing basis documentation affected by the change reflect the design and licensing basis of the facility after the change has been made.

6. Verify that modifications to existing operating procedures were completed before the change was implemented.

7. Verify that any necessary training or retraining was completed before the change was implemented.

8. Verify that the change received the appropriate level of management review and that the reviews were adequate and documented in accordance with the requirements of the license.

9. If the modification was temporary, confirm that the duration of the change was approved and adequate.

10. Verify that impacts or modifications to the Integrated Safety Analysis (ISA), ISA summary, or other safety program information was developed in accordance with 10 CFR 70.62.

11. Verify that the change was evaluated before it was implemented, to determine whether an amendment to the license was required in accordance with 10 CFR 70.34. Specifically, confirm the modification did not:

(a) Create a new type of accident sequence that would exceed the performance requirements in 10 CFR 70.61, and that has not previously been described in the ISA summary;

(b) Use new processes, technologies, or control systems for which the licensee has no prior experience;

(c) Does not remove, without at least an equivalent replacement of the safety function, an IROFS that is listed in the ISA summary and is necessary for compliance with the performance requirements of 10 CFR 70.61;

(d) Does not alter any IROFS listed in the ISA summary that is the sole item preventing or mitigating an accident sequence that exceeds the performance requirements of 10 CFR 70.61; and

(e) Is not otherwise prohibited by the license.

Note: This procedure may be performed in conjunction with performing a system walkdown as outlined in Attachment 88135.04, "ISA Implementation."

02.02 Identification and Resolution of Problems.

a. Inspection Requirement. Verify that the licensee is identifying issues associated with implementing plant modifications at an appropriate threshold, and entering them in the corrective action program.

For a sample of significant plant modification issues documented in the corrective action program, verify that the licensee has identified and implemented appropriate corrective actions.

b. Inspection Guidance. The inspector should use the guidance in Attachment 02, "Plant Status," Section 02.05, "Identification and Resolution of Problems," when verifying the effectiveness of corrective actions.

88135.17-03 RESOURCE ESTIMATE

The total hours to complete this inspection is estimated to be 40 hours annually for sites with two residents, and 20 hours annually for sites with only one resident.

Time spent conducting activities associated with this procedure should be charged to IP 88135. Completion of plant modification inspection activities should be documented in the quarterly inspection report for the quarter in which the inspections were performed.

88135.17-04 REFERENCES

04.01 10 CFR 70.34, “Amendment of Licenses”

04.02 10 CFR 70.61, “Performance Requirements”

04.03 10 CFR 70.62, “Safety Program and Integrated Safety Analysis”

04.04 10 CFR 70.72, “Facility Changes and Change Process”

04.05 Reg Guide 3.74, “Guidance for Fuel Cycle Facility Change Processes”

88135.17-05 PROCEDURE COMPLETION

Inspection of the minimum sample size will constitute completion of this procedure. The minimum sample size is recommended to consist of one modifications inspection per year for sites with one resident inspector and two inspections per year for sites with two resident inspectors.

END

Attachment:
Revision History for IP 88135.17

Attachment 1 - Revision History for IP 88135.17

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML13233A175 01/31/14 CN 14-004	IP 88135 was revised in its entirety.[1] Attachment 88135.17 is new.	N/A	ML13354B897

[1] Specific changes include:

- Breakout of inspection requirements into attachments.
- Incorporated specific language requiring that inspection planning be risk-informed.
- Incorporated specific language requiring inspectors to address corrective action program effectiveness when performing inspections.
- Where it was determined that to maintain specific program elements within the 88135 base procedure (such as elements related to fire protection) would make the procedure too cumbersome, these elements were broken out separately using attachments.
- Incorporated program weaknesses identified in the July 2010 Self-Assessment of the Division of Fuel Facility Inspection Program recommending inspection procedures focus less on the observation of maintenance procedures and more on post-maintenance testing and surveillance testing.
- Revised format to comply with the requirements of IMC 0040.