

June 8, 2015

MEMORANDUM TO: Brian E. Thomas, Director  
Division of Engineering  
Office of Nuclear Regulatory Research

FROM: Lawrence E. Kokajko, Director **/RA/**  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: RESULTS OF PERIODIC REVIEW OF REGULATORY GUIDE 2.5

This memorandum documents the U.S. Nuclear Regulatory Commission (NRC) periodic review of Regulatory Guide (RG) 2.5, "Quality Assurance Program Requirements for Research and Test Reactors." The RG describes a method acceptable to the staff of the NRC of complying with the Commission's regulations with regard to the overall quality assurance program requirements for research and test reactors, published in June 2010. As discussed in Management Directive 6.6, "Regulatory Guides," the NRC reviews RGs approximately every five years to ensure that the RGs continue to provide useful guidance. The documentation of the Office of Nuclear Reactor Regulation (NRR) staff review is enclosed.

Based on the results of the periodic review, the NRR staff concludes that no changes to RG 2.5, Revision 1, are warranted at this time. However, the staff identified one minor item during the review that could warrant addressing in a future revision. An update to the most recent reaffirmation date of May 10, 2013, for American National Standards Institute/American Nuclear Society-15.8-1995, should be effected at the next revision.

Enclosure:  
Regulatory Guide Periodic Review

CONTACT: Leslie Perkins, NRR/DPR  
(301) 415-2375

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## **Regulatory Guide Periodic Review**

Regulatory Guide Number: **2.5**  
Revision number: **Rev. 1**

Title: **Quality Assurance Program Requirements for Research and Test Reactors**

Office/division/branch: **NRR/DPR/PRLB**  
Technical Lead: **Geoffrey Wertz**

Staff Action Decided: **Reviewed with issues identified for future consideration**

**1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?**

There are no known technical or regulatory issues with RG 2.5, "Quality Assurance Program Requirements for Research and Test Reactors." The RG provides guidance that describes a method acceptable to the staff of the U.S. Nuclear Regulatory Commission (NRC) of complying with the Commission's regulations with regard to the overall quality assurance program requirements for research and test reactors. The guidance in RG 2.5 endorses the American National Standards Institute (ANSI)/American Nuclear Society (ANS)-15.8-1995, "American National Standard Quality Assurance Program Requirements for Research Reactors." The regulatory position in the RG is acceptable and suitable for use to develop and/or propose a quality assurance program applicable to research and test reactors today. The references provided in the RG remain current.

The only change noted in the staff review was that ANSI/ANS-15.8-1995 was reaffirmed May 10, 2013. RG 2.5, which was last updated in June 2010, provides the version of ANSI/ANS-15.8-1995 current at that time, which has a reaffirmation date of September 2005. However, there are no indicated changes to ANSI/ANS-15.8-1995 as a result of the reaffirmation, and therefore, no reason to revise RG 2.5 due to this change in reaffirmation date.

**2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?**

There are currently no known or anticipated licensing or inspection activities from internal or external stakeholders that will be impacted by not updating RG 2.5 at this time.

ENCLOSURE

- 3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?**

Revising RG 2.5 will require 40 staff hours to update the reference to the reaffirmation date of May 10, 2013, for ANSI/ANS-15.8-1995.

- 4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Reviewed with issues identified for future consideration. However, the Nuclear Reactor Regulation staff recommends that RG 2.5 be considered acceptable for use at this time.

- 5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

An update to the most recent reaffirmation date of May 10, 2013, for ANSI/ANS-15.8-1995, should be considered when a revision is required for a more significant technical or regulatory reason.

**NOTE: This review was conducted in April 2015 and reflects the staff's plans as of that date. These plans are tentative and are subject to change.**