

DECOMMISSIONING POWER REACTOR INSPECTION PROGRAM

2561-01 PURPOSE

To establish the policy and guidance for the inspection of decommissioning nuclear power reactors for the Office of Nuclear Material Safety and Safeguards (NMSS) and the Office of Nuclear Reactor Regulation (NRR), in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.82, "Termination of license," and other decommissioning regulations, as applicable.

2561-02 OBJECTIVES

02.01 To obtain information through direct observation and verification of licensee activities to determine whether the power reactor is being decommissioned safely, that spent fuel is safely and securely stored onsite or transferred to another licensed location, and that site operations and license termination activities are in conformance with applicable regulatory requirements, the facility licensing basis, licensee commitments, and management controls.

02.02 To verify that (1) the licensee's procedures, processes, and programs for post-operational transition, decommissioning, and license termination are adequate, (2) necessary programs continue from the period of operation into decommissioning in accordance with the applicable regulatory requirements, and (3) the safety culture established during reactor operations is maintained. These decommissioning programs are assessed by inspection of four functional areas: plant status; modifications, maintenance, and surveillances; problem identification and resolution; and radiation protection.

02.03 To identify declining trends in performance and perform inspections to verify that the licensee has resolved the issue(s) before performance declines below an acceptable level.

02.04 To provide for effective allocation of resources for the inspection of nuclear power reactors following permanent cessation of operations.

2561-03 APPLICABILITY

This program is to be implemented following the certification date for permanent removal of fuel from the reactor vessel (10 CFR 50.82(a)(1)(ii)) and is to continue until license termination.

Decommissioning. To remove a facility or site safely from service and reduce residual radioactivity to a level that permits (1) release of the property for unrestricted use and termination of the license, or (2) release of the property under restricted conditions and termination of the license.

DECON. The equipment, structures, and portions of the facility and site that contain radioactive contaminants are removed or decontaminated to a level that permits termination of the license after cessation of operations.

Independent Spent Fuel Storage Installation (ISFSI). A complex designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage. An ISFSI may either have a general license or a specific license under 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste," and may or may not be located near an operating or formerly operating nuclear reactor.

License Termination Plan. A plan required by 10 CFR 50.82(a)(9) that includes (1) a site characterization; (2) identification of remaining dismantlement activities; (3) plans for site remediation; (4) detailed plans for the final radiation survey; (5) a description of the end use of the site, if restricted; (6) an updated site-specific estimate of remaining decommissioning costs; (7) a supplement to the environmental report describing any new information or significant environmental change associated with site decommissioning; and (8) identification of parts, if any, of the site that were released for use before approval of the license termination plan.

Current Licensing Basis. The licensing basis is the set of NRC requirements applicable to a specific facility, plus a licensee's docketed and currently effective written commitments for ensuring compliance with, and operation within, applicable NRC requirements and the plant-specific design basis. This includes all modifications and additions to these commitments over the life of the facility operating license, such as changes made during the transition to decommissioning.

The set of NRC requirements applicable to a specific facility licensing basis include:

- The NRC regulations contained in 10 CFR Parts 2, 19, 20, 21, 26, 30, 40, 50, 51, 54, 55, 70, 72, 73, and 100, and the appendices thereto.
- Commission orders, license conditions, exemptions, and site-specific technical specification requirements.
- Plant-specific design basis information defined in 10 CFR 50.2, "Definitions," and documented in the most recent Updated Final Safety Analysis Report (UFSAR) (as required by 10 CFR 50.71, "Maintenance of records, making of reports").
- Licensee commitments remaining in effect that were made in docketed licensing correspondence (such as licensee responses to NRC bulletins, generic letters, and enforcement actions), which are subject to change as the plant enters the decommissioning process.

- Licensee commitments documented in required certifications and submittals, NRC safety evaluations, and licensee event reports.

Major Decommissioning Activity. For a nuclear power facility, any activity that results in permanent removal of major radioactive components, permanently modifies the structure of the containment (for pressurized water reactors (PWRs), primary containment; for boiling water reactors (BWRs), the primary and secondary containments), or results in the dismantling of components or systems for shipment containing “greater than Class C” (GTCC) waste (see 10 CFR 61.55, “Waste classification”). The licensee is precluded by regulation from conducting major decommissioning activities until 90 days after the NRC has received the Post-Shutdown Decommissioning Activities Report (PSDAR) submittal and the 10 CFR 50.82(a)(1) certifications have been submitted by the licensee.

Major Radioactive Component. For a nuclear power plant, this includes the reactor vessel and internals, steam generators, pressurizer, large bore reactor coolant system piping, and other large components that are radioactive to a comparable degree.

Permanent Cessation of Operations. The permanent cessation of power operations means, for a nuclear power reactor facility, a certification by a licensee to the NRC that it has permanently ceased or will permanently cease reactor operation(s), or a final legally effective order to permanently cease operation(s) has come into effect. Following this certification, the licensee may possess the power reactor structures, systems, and components, reactor site, and related radioactive material, but is prohibited by regulation from operating the reactor.

Permanent Fuel Removal. Permanent fuel removal from the reactor vessel is a licensee determination certified to the NRC in writing in accordance with 10 CFR 50.82(a)(1)(ii). Following the receipt of this certification, the licensee has permanently ceased operations and entered decommissioning.

Possession-Only License. Possession-only licenses (POLs) were issued by NRR to decommissioning licensees prior to the decommissioning regulation changes in 1996. POLs are amended to reflect the permanently shutdown condition of the facility and the licensee's continued possession of spent nuclear fuel. POLs are no longer issued to any facility that entered decommissioning after the 1996 decommissioning rule change.

Post-Operation Transition Phase. The interval between final reactor shutdown and the establishment of a safe and stable permanently shutdown and defueled condition, which is based on the completion of regulatory and safety milestones. NRR Office Instruction COM-101 and NMSS Policy and Procedure 5-1 provide direction for NRC activities and funding requirements during the operation-to-decommissioning transition. During this phase, the licensee establishes safe shutdown conditions and places the facility in a configuration acceptable for decommissioning, consistent with the decommissioning strategy chosen by the licensee. In addition, during this transition phase the licensee will be implementing policies, programs, and procedures to reflect the permanently shutdown and defueled condition of the facility. These changes may include making physical modifications to the plant, such as alterations to the spent fuel pool that could modify the facility security plan.

Post-Shutdown Decommissioning Activities Report. A report required by 10 CFR 50.82(a)(4) that provides a description of the licensee's planned decommissioning activities, a schedule for their accomplishment, an estimate of the associated decommissioning costs, and a discussion that provides the reasons for concluding that the environmental impacts associated with

site-specific decommissioning will be bounded by appropriate, previously issued environmental impact statements or other environmental assessments.

Power Reactor. A nuclear facility having a reactor licensed under 10 CFR Part 50, “Domestic Licensing of Production and Utilization Facilities,” for power generation which may or may not have generated electrical power. For the purposes of this manual chapter, the power reactor is also considered to include the land area within the licensed boundaries of the site, as described in the NRC operating license.

SAFSTOR. The facility is placed in a safe, stable, condition and maintained in that state until it is subsequently decontaminated and dismantled to levels that permit license termination.

Technical Specifications (TSs). An appendix to the facility license that contains safety requirements, bases, safety limits, limiting conditions for operation, and administrative requirements to provide assurance that decommissioning can be conducted safely and in accordance with regulatory requirements. Terminology such as “permanently defueled TSs” (PDTS) or “decommissioning TSs” (DTS) has been used to describe TSs that have been amended to reflect the permanently shutdown and defueled condition of the reactor.

2561-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Director, Office of Nuclear Reactor Regulation. Provides overall direction for the transition of power reactors from operation to decommissioning and the transfer of the facility from NRR project management and the Reactor Oversight Program to NMSS project management and the Decommissioning Power Reactor Inspection Program. NRR Office Procedure COM-101 provides details on the project management transfer to NMSS, as well as the necessary resource transfer for both NMSS project management and appropriate regional inspection program responsibilities.

05.02 Chief, Inspection Program Branch (NRR). Provides overall agency leadership for the Reactor Oversight Program and concurs on changes to this manual chapter that impact or potentially affect the inspection of power reactors in the Post-Operation Transition Phase.

05.03 Director, Office of Nuclear Materials Safety and Safeguards. Provides overall direction for the decommissioning power reactor project management and inspection programs, for power reactors in decommissioning status, until the license is terminated. NMSS Policy and Procedure 5.1 provides details on the project management transfer to NMSS, as well as the necessary resource transfer for both NMSS project management and appropriate regional inspection program responsibilities.

05.04 Chief, Reactor Decommissioning Branch (NMSS). Coordinates, develops, and implements the decommissioning power reactor project management program, and provides programmatic oversight of the regional inspection requirements and policies.

05.05 Regional Administrator and Regional Management. In concert with NRC Headquarters, the Regional Offices direct the implementation of the inspection program for decommissioning power reactors. Ensures that the regional office staff includes an adequate number of inspectors in various disciplines to carry out the inspection program as assigned and described in this manual chapter and within budget limitations. Determines the need for the temporary assignment of an inspector at a facility that has permanently shutdown and the duration and

scope of this inspection coverage. Applies inspection resources, as necessary, to deal with issues that arise at specific facilities undergoing decommissioning. Headquarters and Regional Division Directors responsible for the implementation of the Reactor Oversight Program and the Decommissioning Power Reactor Inspection Program should determine the appropriate timing for transfer of the reactor inspection program from Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase," to IMC 2561, "Decommissioning Power Reactor Inspection Program." The transfer should be documented in a letter between the appropriate Division Directors, including a statement of the formal transfer date, in order to ensure that the necessary resources, including travel funds, are allocated appropriately between the divisions to support performance of the required inspection activities.

05.06 Chief, Decommissioning Inspection Branch. Directs and implements the decommissioning power reactor inspection program in the Regions in accordance with this manual chapter. This inspection program is to be implemented on or shortly after the licensee certifies permanent removal of the fuel from the reactor vessel and coordinated with the appropriate Resident Inspectors, and Headquarters and Regional Managers.

2561-06 REACTOR DECOMMISSIONING INSPECTION PROGRAM

06.01 Program Discussion

The decommissioning power reactor inspection program describes the inspection requirements for the decommissioning of 10 CFR Part 50 power reactor licensees. This inspection program should be implemented on or shortly after the date the licensee certifies permanent fuel removal from the reactor vessel (in accordance with the certifications required by 10 CFR 50.82(a)(1)) and is to continue during all parts of decommissioning until the license is terminated.

In accordance with the NRC regulations, the decommissioning of power reactors may take up to 60 years depending on a number of considerations. In addition, the decommissioning activities at a specific facility may range from relative inactivity (e.g., deferred dismantlement under SAFSTOR) to activities that have a greater potential to challenge public health and safety and the environment (e.g., active dismantlement under DECON). Because of this wide range of decommissioning and safety considerations, this manual chapter promulgates inspection requirements and guidance necessary to provide reasonable assurance that (1) the NRC's regulatory oversight contributes to the protection of public health and safety, and (2) NRC staff oversight and inspection resources are effective, consistent, and appropriately focused. Specifically, this inspection program focuses on ensuring that:

- (Plant Status) Licensee documents, programs, and procedures are adequately implemented and maintained, and reflect the status of decommissioning at the facility.
- (Modifications, Maintenance, and Surveillance) Licensee activities, organizational structure, and programmatic controls provide reasonable assurance that decommissioning and spent fuel storage can be conducted safely and in accordance with the regulatory requirements.
- (Problem Identification and Resolution) Licensee staff readily identify emergent problems, evaluate them, and correct issues of concern in accordance with the NRC-approved corrective action program and other quality assurance requirements.

- (Radiation Protection) Licensee adequately protects workers, the public, and the environment from the hazards associated with ionizing radiation.

These objectives comprise the functional areas evaluated during inspection activities required by the decommissioning core inspection procedures listed in Appendix A of this manual chapter. The overall inspection effort is divided into functional area assessments to inspect licensee performance, identify performance trends, preclude problems, identify weaknesses, and foster corrective actions to contribute to public health and safety and the protection of the environment during the decommissioning process. The inspection program also provides appropriate latitude for NRC management to administer, plan, and implement site-specific master inspection plans commensurate, in part, with licensee performance, site activities, and safety.

The decommissioning inspection program is further divided into two program elements: core inspections and discretionary inspections (i.e., routine and reactive inspections). The core inspection procedures, listed in Appendix A, Section I, are to be performed in accordance with the periodicity and scope outlined in the resource table in Appendix A, Section II, at all decommissioning power reactors. Deviations from the core inspection program should be handled as discussed in Section 06.04, "Master Inspection Plans," of this manual chapter. Decommissioning core inspection areas include, but are not limited to: organization and management controls; quality assurance; spent fuel wet storage and handling, if applicable; maintenance and surveillance activities; radiation protection; materials control and accountability; physical security; and evaluations of modifications made at the facility in accordance with 10 CFR 50.59, "Changes, tests, and experiments." Other core procedures include those applicable to license termination activities and the transportation of irradiated fuel and other radioactive materials.

The discretionary inspection documents, listed in Appendix B, are inspection procedures and IMCs that may be performed as needed at a decommissioning power reactor (as determined by NRC management), or used as supplemental guidance during the conduct of the core inspection program. The Appendix B procedures include generic safety reviews, team inspections, and functional area assessments that focus on radiation protection, radioactive material control, transportation, and other disciplines. These supplemental inspection procedures are referenced from IMC 2515, IMC 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program," and IMC 2800, "Materials Inspection Program," among others, in order to provide insight into the allocation of resources, completion of inspection procedures, and follow-up of open items. Discretionary inspections should be used to augment the core inspection program and assess particular functional areas, safety concerns, or aspects of licensee performance, and may be used to supplement or inform inspections conducted under a core inspection procedure.

The core inspection procedures in Appendix A will be reviewed by headquarters inspection personnel and the regional staff and revised by headquarters staff, as necessary, to enhance the overall inspection program and provide for the early identification of potential decommissioning safety problems and other issues. The list of inspection documents for discretionary use in Appendix B of this manual chapter will be reviewed by headquarters inspection personnel and the regional staff and revised by headquarters staff, as appropriate, to reflect the discretionary documents that are applicable and useful to the decommissioning power reactor inspection program. In most cases, groups outside of the decommissioning power reactor inspection program have ownership of these inspection procedures and are responsible for their periodic review and revision. Accordingly, decommissioning power reactor

inspection staff should provide any suggested content improvements for the discretionary procedures to the appropriate inspection branch or office as needed.

The direct inspection effort associated with the implementation of the core inspection procedures should, in part, be dependent on the decommissioning activities being planned or performed at the facility. For planning purposes, the range of decommissioning activities are grouped into eight possible categories. These categories are defined as follows:

1. Post-Operation Transition Phase
2. Actively Decommissioning (DECON), Fuel in the Spent Fuel Pool
3. Actively Decommissioning (DECON), No Fuel in the Spent Fuel Pool
4. SAFSTOR, Fuel in the Spent Fuel Pool
5. SAFSTOR, No Fuel in the Spent Fuel Pool
6. SAFSTOR, Co-Located with Operational Unit, Fuel in the Spent Fuel Pool
7. SAFSTOR, Co-Located with Operational Unit, No Fuel in the Spent Fuel Pool
8. Final Status Surveys Underway, No Fuel in the Spent Fuel Pool

It is expected that the category, and thus the appropriate direct inspection effort and associated resources for a decommissioning power reactor, will change over time, based on the progress of decommissioning at the facility (i.e., an actively decommissioning facility would be expected to go from Category 1 to 2 and eventually to Category 8 as decommissioning progresses). Categories 4 and 5 are intended for decommissioning single or multi-unit sites in SAFSTOR where all units have permanently shutdown. Categories 6 and 7 are intended for decommissioning units at multi-unit sites where at least one unit is still in operation. These operational units are expected to maintain resident inspectors that provide oversight of the site wide programmatic inspections, such as radiological safety, corrective action, and quality assurance. Appendix A, Section II provides a table with the recommended average annual inspection hours for each of these decommissioning categories.

In summary, the decommissioning power reactor inspection program emphasizes balanced oversight and review of a cross-section of licensee activities important to the conduct of safe decommissioning and spent fuel safety. Licensee decommissioning programs and procedures should be assessed to ensure that they afford a comparable level of quality, rigor, and effectiveness as those in existence during power reactor operations, while taking into consideration the decreased risk to public health and safety and the environment that is present at a decommissioning facility. The decommissioning power reactor inspection program also provides NRC management with flexibility in the allocation of inspection resources to address emergent activities and potential issues at specific decommissioning power reactors.

06.02 Inspection Procedures

Each core inspection procedure listed in Appendix A is to be completed in accordance with the periodicity and scope outlined in the resource table in Section II, at each decommissioning power reactor facility. Discretionary inspection procedures listed in Appendix B, or TIs, may also be used to meet a core inspection procedure requirement as long as the functional area assessments are equivalent. Although all of the specific requirements in each inspection procedure need not be completed during every decommissioning inspection, the objectives of the inspection procedure should be met for each inspection activity. This allows the overall decommissioning inspection program the flexibility to adjust resources to address the level of activity and other considerations at a particular decommissioning facility. Inspection completion is determined by a combination of regional management evaluating the number of hours spent

on an inspection procedure and consulting with the appropriate inspector in order to conclude that the inspection may be closed.

The scope of a particular inspection procedure and its respective requirements may be adjusted by regional management, as appropriate, to satisfy the objectives of this manual chapter as it applies to the specific facility being inspected. A TI may be required during decommissioning in order to cover areas not explicitly addressed by existing inspection procedures for site-specific situations, and will be determined on a case-by-case basis. The core inspection procedures are always expected to be performed in accordance with the periodicity and scope outlined in the resource table in Appendix A, Section II, at each facility. If no activity is believed to have occurred since the last annual inspection at a SAFSTOR facility, an inspector should verify that no activities occurred onsite using the applicable inspection procedure(s). If a core inspection procedure is not applicable to the current facility conditions (e.g., the spent fuel pool is no longer in service and therefore the associated inspection procedure is unnecessary), then the procedure is not required to be performed to complete the inspection requirements at the site.

06.03 Direct Inspection Effort

The estimate of direct inspection hour resources in Appendix A of this manual chapter refers to the estimated average time needed to complete the inspection procedure objectives at a given facility. The resource estimate is provided for planning purposes only, and deviations from the estimate should be made based on licensee performance, multi-unit site considerations, resident inspection activities, the type and schedule of decommissioning activities being conducted by the licensee, and the radiological source term present at the site.

The direct inspection hour estimates are based on current experience regarding the time needed on site to complete the inspection procedure requirements, and will be reviewed periodically. It is expected that actual direct inspection hours will vary from site to site, as well as from the estimate given in a particular inspection procedure, depending on the status of decommissioning and the activities underway at the site, as well as NRC management discretion and the availability of inspection funding. Completion of inspection procedures shall be accurately recorded. Completion of the overall decommissioning inspection program is dependent on completing the scope of inspections required in Appendix A, Section II.

06.04 Master Inspection Plans

At the discretion of Regional Management, the regional staff may choose to develop annual site-specific master inspection plans for a power reactor facility undergoing decommissioning, consistent with the guidance in this manual chapter, and using the inspection procedures listed in Appendix A and Appendix B, or an applicable TI. Regional and headquarters staff should review the licensee's planned decommissioning activities for the upcoming year based on the schedule details in the PSDAR and discussions with licensee management. If used, the site-specific master inspection plan should list the inspection procedures planned at each facility throughout the inspection period. Master inspection plans should, at a minimum, be reviewed as a licensee transitions between decommissioning phases (e.g., transition from SAFSTOR to DECON) and updated accordingly. Discretionary procedures may be used to augment the site-specific master inspection plan or used as guidance (and not listed in the master inspection plan). Discretionary inspection procedures or TIs may also be used to meet a core inspection procedure requirement as long as the functional area assessments are equivalent.

The following factors should be considered in developing and implementing a site-specific master inspection plan:

- a. Design. Some power reactors will have unique designs, configurations, and environmental considerations that could bias an inspection effort to specific areas of potential concern. For example, unique or challenging hydrological conditions at a site (such as diversion of the radiological effluent stream, excavation of contaminated soils from below a water table, or dredging of soils from outfalls or intakes) or shared systems between reactor units, may warrant an increased inspection effort.
- b. Plant Status. Plant status will vary between reactor units and depend, in part, on the status of decommissioning. For example, even if a power reactor is in long-term storage, the licensee could elect to change system(s) operation, configuration, or design to enhance performance, efficiency, or reduce costs. These plant status changes may subsequently change the NRC inspection effort listed in Appendix A, Section II. Master inspection plans should also take into account the licensee's spent fuel storage location and transfer plans, criticality and decay heat removal considerations in the spent fuel pool, and planned facility and environmental changes.
- c. Licensee Performance, Management, and Decommissioning Scheduling. The scope and frequency of inspections specified in the site-specific master inspection plan should also be based on licensee performance, staffing plans, effectiveness of management oversight and contractor control, and the timing and scheduling of significant decommissioning activities. Other elements, such as the loss of licensee technical expertise and nuclear experience, should factor into the development of a site-specific master inspection plan. For example, a lack of detail or missing licensee radiological release records (see 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning"), a marked reduction in staff experience, technical expertise, or significant changes in the level of quality assurance oversight, or significant problems that originated during power operations may require additional NRC inspections. Similarly, the use of technologically advanced contamination removal methods, dismantlement techniques, or transportation packaging may require enhanced NRC oversight.
- d. Multi-Unit Sites. The site-specific master inspection plan should take into account whether the decommissioning facility shares programs and structures, systems, and components (SSCs) with other operating or decommissioning units on site. These SSCs could include service water, fire protection, electrical systems, and radiological effluent streams. Additionally, programs such as the Corrective Action, Radiation Protection, Emergency Preparedness, and Fire Protection Programs could be shared among units. The amount of direct inspection effort at the decommissioning unit(s) should be tailored to avoid duplicating reviews of the plans, programs, and procedures shared among the units where the resident and regional inspectors provide various levels of oversight, and the inspectors should evaluate those shared areas to provide assurance that potential vulnerabilities between units are understood and mitigated.

Inspections conducted early in the decommissioning process should use the procedures listed in Appendix A, and should: (1) provide sufficient evidence to confirm that the licensee can or will safely transition into decommissioning; (2) verify that procedures, programs, and facility operations implement license requirements and reflect the current licensing bases as described in the Final Safety Analysis Report (or Updated Final Safety Analysis Report), PSDAR, or other applicable licensing basis documentation; (3) confirm that management oversight and control,

as well as safety culture, are adequate; and (4) take appropriate credit for NRC inspections conducted while the unit was operating.

For power reactors in a SAFSTOR condition, it is not expected that the licensee will undertake activities that have the potential to significantly impact public health and safety, security, or the environment. Therefore, the direct inspection effort for units in SAFSTOR is likely to be at the lower end of the range for decommissioning inspections, while still maintaining an acceptable periodic NRC presence at the site. Based on the NRC staff's assessment of licensee performance and the conduct of facility activities, appropriate changes to the inspection plan, inspection procedure periodicity, or level of inspection effort could be implemented. Similarly, although a power reactor unit may be in SAFSTOR, the licensee may elect to incrementally dismantle certain SSCs over the course of years using the 10 CFR 50.59 process. To account for the incremental dismantlement of a facility while in SAFSTOR, the decommissioning inspection program conservatively assumes that licensee procedures, controls, staff knowledge and cognizance of the 10 CFR Part 50 requirements could diminish over time, and anticipates that the direct inspection effort for sites in SAFSTOR would increase toward the upper end of the range for decommissioning inspections.

For a licensee planning or preparing to actively dismantle, decontaminate, or decommission its facility after a long period of relative inactivity, the NRC staff expects that the inspection effort will also increase commensurate with the planned licensee activities, and may approach the same level of effort as at actively decommissioning facilities. If, as a part of overall facility decommissioning, the operating license is transferred to another entity, or a general decommissioning contractor is used to perform reactor decommissioning or maintain the unit in SAFSTOR, attention should be given to ensure the safety culture of the new management is appropriate and consistent with license requirements and expectations.

For a licensee planning or conducting irradiated fuel handling activities, direct inspection efforts should be accomplished in accordance with IMC 2690, "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations." IMC 2690 inspection requirements should complement the inspection effort required by this manual chapter.

06.05 Periodic Management Review of Site-Specific Master Inspection Plans

The regional staff should periodically review the site-specific master inspection plans and adjust the planned inspection efforts to reflect any identified inspection issues or changes in plant status and decommissioning activities. During these inspection plan reviews, regional management should assess licensee performance and use these insights as one of the many possible justifications to change the site-specific master inspection plan (i.e., increased or decreased inspection effort, schedule changes, or inspection procedure deletions). This review of licensee performance should focus on the four functional area assessments of the decommissioning power reactor inspection program: plant status; modifications, maintenance, and surveillance; problem identification and resolution; and radiation protection.

In addition, regional management should periodically assess completion of the required periodic core decommissioning inspections at each facility. This assessment should include a review of whether the master inspection plan was executed as outlined by the staff, and where deviations from the master inspection plan exist, they should be justified and accounted for in a manner acceptable to regional management. Per the performance plan requirements, a minimum of 80 percent of the required periodic core decommissioning inspections are to be completed at each decommissioning facility across all Regions.

06.06 Management Communication with Licensee Representatives and Public Outreach

In addition to the 10 CFR 50.82 requirements to hold public meetings related to certain decommissioning activities in the vicinity of the decommissioning power reactor, NRC headquarters and regional management should plan periodic visits to decommissioning facilities in order to more fully understand the licensee's plans to decommission the facility. Licensee programs for the control and handling of radioactive materials, the conduct of 10 CFR 50.59 evaluations, and configuration control are potential topics to be discussed for the benefit of both parties. Further, licensee staffing and retention plans could be discussed and understood in order to provide assurance that changes in site staffing, experience, or expertise will not result in unsafe decommissioning practices, impact spent fuel safety, or result in excessive use of the decommissioning funds. The NRC managers could also address plans to maintain and preserve the licensed configuration of the facility (as described in the current licensing basis), as well as whether the licensee is planning any significant licensing actions and/or changes to its programs as a result of decommissioning. NRC management should consider visiting the site prior to the development of a site-specific master inspection plan or a significant change in decommissioning status. As decommissioning progresses, additional site visits may be held periodically or prior to major changes in the status of decommissioning to gain licensee management insights and perspectives. The NRC management focus should be to understand licensee plans, schedules, and controls implemented to ensure quality and safety.

The NRC is an independent safety regulator and maintains an "open door" policy with regard to access by members of the public or State and local officials to the NRC staff, as well as to publicly available documentation concerning a licensee's current and past performance. Some licensees or States will sponsor periodic community engagement panels or citizens advisory boards to discuss various decommissioning topics that may be of interest to affected stakeholders near the plant; inspectors should consider attending these community meetings when appropriate. The degree of interaction that is considered necessary to maintain transparency regarding ongoing NRC oversight activities is expected to vary widely depending upon the situation at each decommissioning facility. In each case where inspectors are utilized in support of this purpose, regional management must carefully balance the use of inspection resources to complete inspections with the need to maintain and enhance public confidence.

06.07 Use of Resident Inspectors at Decommissioning Power Reactors

After a licensee permanently ceases power operations, the inspection program for decommissioning power reactor facilities considers the following: (1) there will likely be initial, short-term, resident inspector coverage; (2) licensee decommissioning programs and procedures should be comparable to the rigor, quality, and effectiveness of those used during power reactor operation; (3) few immediate changes would be expected in the technical ability and safety perspective of the licensee's staff and management; and (4) the primary safety significant activities would consist of maintaining safe reactor shutdown, conducting safe fuel handling and storage, and placing systems that are no longer necessary for safe facility operation into a storage or de-energized configuration.

During the period with a resident inspector still assigned at a permanently shutdown reactor unit, the site-specific inspection effort will be based on the operating reactor inspection program (IMC 2515). Section 2515-15, "Baseline Inspection Guidance for Power Reactors Preparing for Transition to Decommissioning Phase," gives additional guidance for inspectors to use during this transition phase. After the licensee certifies permanent fuel removal from the reactor

vessel, IMC 2561 is implemented for the remainder of the decommissioning process, and the licensee is removed from oversight under the operating power reactor inspection program. The licensee is informed of the transition in oversight programs as specified in IMC 0305, "Operating Reactor Assessment Program." After implementation of the decommissioning power reactor inspection program, resident inspector (or region-based) direct inspection effort will be based on the "Transition" column of Appendix A, Section II, until the facility has fully transferred to a decommissioning status (i.e., the licensing basis reflects the decommissioning approach and project management responsibility has been transferred from NRR to NMSS). Therefore, resident inspectors assigned at decommissioning facilities can be temporarily detailed to other sites or assignments, as necessary, to support the NRC's mission.

At a single unit power reactor facility that has just entered permanent shutdown, one of the two resident inspectors could be detailed away from the site shortly after the establishment of safe reactor shutdown. The remaining resident inspector should stay at the site for a pre-determined period as agreed upon by the applicable regional and headquarters Division Directors. Considerations for establishing this time period include if the licensee: (1) plans to enter active decontamination and dismantlement, or if licensee operational performance dictates, the remaining resident inspector could stay at the site for up to a year; (2) plans to enter SAFSTOR, the length of service of the remaining inspector would be based, in part, on the licensee's decommissioning schedule and the NRC's assessment of licensee performance, and should typically not exceed 6 months; or (3) had a significant operational event or accident prior to permanent shutdown, the assignment of NRC staff to the site would be based solely on NRC management discretion, not subject to the guidance in this section. For scenarios (1) and (2) above, and for the multi-unit discussion below, the assignment of a resident inspector in excess of the 6-month and 12-month periods described should be justified and documented in a memo to file, created by the Division of Reactor Projects and agreed upon by the applicable regional and headquarters Division Directors.

For multi-unit reactor sites that have one or more units permanently shutdown, the guidelines in the preceding paragraph would be applicable. However, the guidelines should be further defined by the following: (1) if multiple units are decommissioning and more than one resident inspector is assigned to the particular facility, a Senior Resident Inspector (SRI), or equivalent, should be assigned to supervise the NRC site activities; and (2) if one or more units remain operational and if there are full- or part-time inspector(s) assigned to the decommissioning unit(s), the decommissioning resident inspectors should have a primary reporting responsibility to the applicable regional division management and a secondary reporting responsibility to the operational unit SRI when decommissioning activities have the potential of impacting operating unit safety. This command structure establishes one "senior" NRC representative at the site to represent the NRC when the need arises, and minimizes any potential adverse impact on the operating unit that may be caused by activities at the decommissioning unit(s).

For multi-unit reactor sites at which there is a mix of operating and decommissioning units, but with no resident inspector coverage at the decommissioning unit(s), headquarters or regional management may allocate decommissioning inspection hours to the operating reactor resident inspector staff in order to conduct periodic assessments of the decommissioning unit(s). The direct inspection activities conducted by the resident inspector(s) in this scenario should be charged to the applicable docket and decommissioning core inspection procedure (Appendix A), and not to the operating reactor docket. These inspection activities may include assessments that focus on observing licensee management meetings, or discussions with the cognitive decommissioning management staff, to ascertain the status of the decommissioning unit(s) or identify any problems encountered while implementing the site decommissioning strategy.

Resident inspector activities at the decommissioning unit(s) shall contribute to the NRC's overall mission to ensure adequate protection of public health and safety and the environment in the use of nuclear materials, and not detract from effective inspection oversight of the operating unit(s). Any follow-up to these routine decommissioning inspection activities should be charged to the appropriate IMC 2515 or IMC 2561 inspection procedure after discussion with the appropriate regional and headquarters management. For decommissioning event response, resident inspectors could be utilized in the same manner to assess and report the situation.

06.08 Basic Inspection Process

The NRC inspection program can only cover a sampling of licensee activities in any particular area, with an emphasis on those activities with relatively high radiological risk. Inspection activities begin with the planning of core and discretionary inspections as part the master inspection plan, using the periodicity described in Appendix A, Section II. Implementation of the inspection plan also includes the coordination of NRC site visits and inspections to promote regulatory efficiency and effectiveness and to reduce regulatory burden on the licensee. Subsequently, the core and discretionary inspections are conducted, inspection reports are written, licensee performance is assessed, and feedback on the decommissioning inspection program should occur. This process will repeat until the site is decommissioned.

A basic inspection should involve the following steps, as applicable:

- a. Prepare for the inspection by reviewing appropriate background material (e.g., the current facility license, the UFSAR, safety evaluations prepared in support of decommissioning activities, environmental monitoring and other environmental reports, the Decommissioning Emergency Preparedness Plan, TSs, the PSDAR, hazards analysis report(s), the license termination plan, past inspection reports, allegations, open item lists (violations, open/unresolved items, license deviations, licensee event reports, and other pertinent information). Attention should also be paid to licensee documents that describe how decommissioning will be conducted (e.g., 10 CFR 50.59 evaluations, quality assurance plans, and license termination plans).
- b. As needed, prepare an inspection plan describing the scope and major areas of emphasis that will be reviewed, evaluated, or assessed during the inspection.
- c. If needed for the specific inspection, the inspector should use appropriate, calibrated radiation detection instrumentation or any other equipment necessary to evaluate and verify licensee activities. The collection of in situ measurements by the NRC can be beneficial as part of future determinations regarding the scope of confirmatory surveys required for the facility. The use of an outside contractor may also be considered to perform confirmatory in situ measurements or laboratory analyses.
- d. Conduct an entrance meeting with the licensee. Inspectors should discuss the inspection scope with licensee management and articulate whether any open items will be reviewed. The lead inspector should state that the inspection may involve the observation of facility operations, interviews with staff, document reviews, and/or radiation surveys to obtain independent and confirmatory data. Appropriate emphasis should be placed on observing staff training, equipment operation, and implementation of the licensed programs during the inspection. Any change or potential change to the onsite inspection plan should be communicated to the appropriate NRC management.

Although unique plant conditions may exist following the permanent cessation of operations, NRC inspectors should not face situations in which license conditions, regulatory requirements, or licensee commitments no longer apply. In cases where unique situations or unclear configurations may be identified, and considered potentially adverse to the conduct of safe decommissioning or public health and safety, the inspector(s) should evaluate whether the licensee is aware of the situation and taking appropriate action, if necessary, to correct and preclude recurrence. Such cases or potential issues involving NRC requirements or licensee commitments should be raised to the responsible NRC manager. Of equal importance, the lead inspector should determine if the situation is beyond the expertise of the inspectors participating in the inspection. If the issue is beyond their expertise, the lead inspector should promptly inform his or her supervision and make recommendations regarding the skillset necessary to appropriately address the decommissioning issue, so that the responsible NRC managers can determine the urgency of the request for assistance, what type of expertise is required, and what extent of effort is required to resolve the issue.

- e. Conduct an exit meeting with licensee management at the conclusion of the inspection. The inspection scope should be reiterated, specific inspection activities discussed, including any facility walkdowns or personnel interviews that yielded information pertinent to the inspection, and any potential violations or other inspection results should be presented, emphasizing their impact on safety. If potential violations are to be presented as part of the inspection results, licensee management and the inspectors' supervisor should be briefed on the preliminary findings and conclusions, as well as any licensee corrective actions identified, prior to the official exit meeting.
- f. Brief additional regional and headquarters personnel, as needed, either while the inspector is onsite or back in the regional or headquarters office. This briefing should include the inspection results, a discussion of any potential violations, and inspector conclusions in order to ascertain whether additional inspection activities should occur.
- g. Document inspection results, open items, follow-up items, and overall inspection conclusions in accordance with IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports," and other relevant regional or headquarters guidance documents. Any allegations reviewed during inspections will be documented and dispositioned in accordance with NRC Management Directive 8.8, "Management of Allegations."

Because decommissioning involves the reduction of residual radioactivity to a level that permits subsequent release of the property and license termination, inspections at decommissioning facilities should: (1) evaluate and document the performance or effectiveness of licensee programs, processes, and equipment used to provide assurance that regulatory requirements are met and that decommissioning is conducted safely; and (2) act as a historical record of the licensee's ability to effectively and accurately conduct radiological surveys and characterization, manage occupational dose, maintain the facility licensing and design basis, and control radiological effluents. This record should help focus future inspections in areas of licensee performance directly related to site release and license termination activities.

06.09 Decommissioning Inspectors

It is expected that all decommissioning inspectors be qualified in accordance with IMC 1248, "Formal Qualifications Program for Federal and State Material and Environmental Management Programs," Appendix F, "Training Requirements and Qualification Journal for Decommissioning

Inspectors.” The decommissioning inspector shall, in part, independently assess and verify licensee activities and performance, discuss any observations and results with the licensee, discuss inspection and general decommissioning issues with NRC management as needed, and periodically docket inspection observations, findings, violations, and conclusions.

The regional division management responsible for inspections at decommissioning power reactors should be kept apprised of all inspection activities. All inspections should be coordinated with the licensee and in concert with the appropriate NRC Project Manager, who is responsible for headquarters oversight and coordination of the facility, well in advance of the inspection. (Note that depending on the status of the decommissioning transition effort, either NRR or NMSS project managers may need to be involved in the inspection coordination effort.) Additional oversight or coordination with NMSS may be needed during the review and approval process for the license termination plan in order to verify or validate implementation of the radiological remediation strategies described in the plan. As appropriate, an outside contractor may be used to provide independent verification of adequate site cleanup and remediation of residual radioactivity during the later phases of decommissioning.

06.10 Modifications or Changes to the Facility

Before undertaking any major decommissioning activities (as defined by 10 CFR 50.2), the licensee must have: (1) certified the permanent removal of all reactor fuel from the vessel and the permanent cessation of operations; (2) submitted a PSDAR to the NRC; and (3) waited 90 days from the date the PSDAR was submitted to allow the NRC time to review the document and solicit stakeholder feedback via a public meeting and other interactions. Prior to these PSDAR activities being complete, a licensee may undertake any minor decommissioning activity that does not result in the permanent removal of major radioactive components (e.g., the steam generators, reactor vessel and internals, pressurizer, large bore reactor coolant system piping, and other large components that are radioactive), permanently modify the structure of the containment, or result in dismantling components for shipment that contain greater than Class C waste in accordance with 10 CFR 61.55, “Waste classification.”

Examples of activities that are not considered major decommissioning activities include: (1) those that could be performed under normal maintenance and repair procedures; (2) the removal of certain, relatively small radioactive components, such as control rod drive mechanisms, control rods, pumps, and valves; (3) removal of components similar to that for maintenance and repair; (4) removal of non-radioactive components and structures not required for safety; and (5) activities related to radiological and contamination characterization.

An important inspection activity during facility decommissioning is the assessment of facility design changes and modifications that were not submitted to the NRC for review and approval before implementation. Such changes to the facility or licensing basis must be performed in accordance with 10 CFR 50.59, license conditions, and applicable licensee procedures. In addition, 10 CFR 50.82(a)(6) states that decommissioning activities must not: (1) foreclose release of the site for possible unrestricted use; (2) significantly increase decommissioning costs; (3) cause any significant environmental impact not previously reviewed; or (4) violate the terms of the existing facility license. Headquarters staff has the lead for assessing the appropriateness of a licensee's decommissioning fund allocation.

END

Appendices

- A. Core Inspection Procedures for Decommissioning Power Reactors
- B. Discretionary Inspection Procedures for Decommissioning Power Reactors

APPENDIX A

I. Core Inspection Procedures for Decommissioning Power Reactors

IP 36801	Organization, Management and Cost Controls at Permanently Shutdown Reactors (PSRs)
IP 37801	Safety Reviews, Design Changes, and Modifications at PSRs
IP 40801	Self-Assessment, Auditing, and Corrective Action at PSRs
IP 60801	Spent Fuel Pool Safety at PSRs
IP 62801	Maintenance and Surveillance at PSRs
IP 71801	Decommissioning Performance and Status Reviews at PSRs
IP 83750	Occupational Radiation Exposure
IP 83801	Inspection of Remedial and Final Surveys at PSRs
IP 84750	Radioactive Waste Treatment, and Effluent and Environmental Monitoring
IP 86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials
IP 71111.01	Adverse Weather Preparations

II. Recommended Average Annual Inspection Hours per Decommissioning Category

IMC 2561 Estimated Inspection Resources											
ESTIMATED (DIRECT) INSPECTION HOURS (CORE IPs)											
Functional Area	Core IP	Title	Cat 1	Cat 2	Cat 3	Cat 4	Cat 5	Cat 6	Cat 7	Cat 8	Procedure Comments
			Transition	D w/ Fuel	D No Fuel	SS w/ Fuel	SS No Fuel	FSS	SS Co-located w/ Fuel	SS Co-located w/o Fuel	
Plant Status	36801	Organization, Management and Cost Controls at PSRs	42	30	20	2	2	0	0	0	Currently considering moving the contents of this IP to other core inspection procedures and deleting IP 36801. As an alternative, this procedure may be renamed to inspect Training and Qualifications.
Plant Status	71801	Decommissioning Performance and Status Reviews at PSRs	32	24	24	10	5	10	8	8	This is essentially a plant status procedure, recommend including hours for all categories.
Corrective Action Program	40801	Self-Assessment, Auditing, and Corrective Action at PSRs	64	64	64	21	21	4	4	4	Adopt IP 71152 guidance as supplemental information. Recommend always including time for corrective action program reviews.
Modifications, Maintenance, and Surveillance	37801	Safety Reviews, Design Changes, and Mods at PSRs	32	32	12	6	2	0	2	2	Hours should be included for final status surveys since a site could make changes to the license termination plan (as discussed in the IP).
Modifications, Maintenance, and Surveillance	60801	Spent Fuel Pool Safety at PSRs	40	25	0	25	0	0	4	0	The operating unit procedure should encompass all spent fuel pool inspection needs at the site. An exception would be for sites with separate spent fuel pools.
Modifications, Maintenance, and Surveillance	62801	Maintenance and Surveillance at PSRs	28	28	10	4	0	0	0	0	This is the "Maintenance Rule" inspection procedure. This inspection needs to be included whenever there is fuel in the pool. Alternatively, the applicable sections could be relocated to IP 60801 since the maintenance rule is limited to the safe storage of spent fuel.
Modifications, Maintenance, and Surveillance	71111.01	Adverse Weather Preparations	12	4	0	4	0	0	4	0	The operating unit procedure should encompass all adverse weather protection needs at the site. An exception would be for sites with separate spent fuel pools.
Radiation Protection and Health Physics	83750	Occupational Radiation Exposure	64	48	46	28	24	30	4	4	
Radiation Protection and Health Physics	83801	Inspection of Remedial and Final Surveys at PSRs	20	78	78	2	2	96	0	0	
Radiation Protection and Health Physics	84750	Radioactive Waste Treatment, and Effluent and Environmental Monitoring	40	40	18	8	4	2	2	2	
Radiation Protection and Health Physics	86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials	72	72	72	10	2	10	2	2	
NOTES:											
1 - Multiply estimated hours by 1.5 for multi-unit decommissioning sites											
2 - These are estimated hours only and may be changed to reflect actual inspection needs											
3 - For decommissioning facilities co-located with an operating unit, radiation protection and other site programs will be reviewed by the resident inspector(s)											
4 - In most cases, the estimated hours represent the direct inspection effort											

END

APPENDIX B

Discretionary Inspection Documents for Decommissioning Power Reactors

Many of these inspection guidance documents are applicable to programs outside the reactor decommissioning inspection process. However, the information they contain may be used to supplement or enhance the inspection activities undertaken in accordance with the core decommissioning inspection procedures listed in Appendix A, Section I.

PLANT OPERATIONS AND OVERSIGHT

IP 42700	Plant Procedures
IP 60705	Preparation for Refueling
IP 60710	Refueling Activities
IMC 0350	Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational Concerns
IMC 0375	Implementation of the Reactor Oversight Process at Reactor Facilities in an Extended Shutdown Condition for Reasons Not Related to Performance

RADIOLOGICAL CONTROLS

IP 69004	Non-Power Reactor Effluent and Environmental Monitoring
IP 71124	Radiation Safety—Public and Occupational
IP 83100	Occupational Exposure During SAFSTOR and DECON
IP 83723	Training and Qualifications: General Employee Training, Radiation Safety, Plant Chemistry, Radwaste, and Transportation Training
IP 83724	External Occupational Exposure Control and Personal Dosimetry
IP 83725	Internal Exposure Control and Assessment
IP 83726	Control of Radioactive Materials and Contamination, Surveys and Monitoring
IP 83728	Maintaining Occupational Exposures As Low As Reasonably Achievable
IP 83729	Occupational Radiation Exposure During Extended Outages
IP 83890	Closeout Inspection and Survey
IP 84101	Radioactive Waste Management

- IP 84850 Radioactive Waste Management-Inspection of Waste Generator Requirements of 10 CFR Part 20, "Standards for Protection Against Radiation," and 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"
- IP 86740 Inspection of Transportation Activities
- IP 88035 Radioactive Waste Processing, Handling, Storage, and Transportation
- IP 88045 Effluent Control and Environmental Protection

MAINTENANCE, SURVEILLANCE, AND FIRE PROTECTION

- IP 42051 Fire Prevention and Protection
- IP 61726 Surveillance Observation
- IP 62700 Maintenance Program Implementation
- IP 62706 Maintenance Rule
- IP 64704 Fire Protection Program
- IP 69010 Research and Test Reactor Surveillance
- IP 88025 Maintenance and Surveillance of Safety Controls

EMERGENCY PREPAREDNESS AND PHYSICAL SECURITY

- IP 81311 Physical Security Requirements for Independent Spent Fuel Storage Installations
- IP 81502 Fitness For Duty
- IP 82401 Decommissioning Emergency Preparedness Scenario Review and Exercise Evaluation
- IP 82501 Decommissioning Emergency Preparedness Program Evaluation
- IP 85103 Material Control and Accounting at Decommissioning Nuclear Power Reactors
- IP 87137 10 CFR Part 37 Materials Security Programs
- IMC 2202 Security Inspection Program for Decommissioning Reactors

ENGINEERING AND TECHNICAL SUPPORT

- IP 37700 Design Changes and Modifications
- IP 41500 Training and Qualification Effectiveness
- IP 69007 Research and Test Reactor Review and Audit and Design Change Functions

IMC 2690 Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings

SAFETY ASSESSMENT AND QUALITY ASSURANCE

IP 71152 Problem Identification and Resolution

IP 88110 Quality Assurance: Problem Identification, Resolution and Corrective Action

IP 90712 In-office Review of Written Reports of Non-Routine Events At Power Reactor Facilities

IP 92700 Onsite Follow-up of Written Reports of Non-Routine Events At Power Reactor Facilities

IP 92701 Follow-up

IP 92702 Followup on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, And Alternative Dispute Resolution Confirmatory Orders

IP 92720 Corrective Action

IMC 1230 Quality Assurance Program for Radiological Confirmatory Measurements

IMC 1232 Collection, Preparation, and Shipment of Independent Measurement Samples

ORGANIZATION, MEETINGS, AND DOCUMENTATION

IP 69006 Research and Test Reactors Organization and Operations and Maintenance Activities

IMC 0620 Inspection Documents and Records

IMC 1007 Interfacing Activities Between Regional Offices of NRC and OSHA

END

Revision History for IMC 2561

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	03/26/92	Initial issuance to establish the inspection policy and guidance for nuclear power reactor facilities during the interval between permanent shutdown and the NRC's approval of a licensee's decommissioning plan.		
	08/11/97	Revised to enhance the NRC inspection of decommissioning power reactors. The IMC requires implementation of a core inspection program and provides inspection guidance for the staff. The IMC was also revised to address a recent amendment to the decommissioning regulations (10 CFR 50.82). This revision does not increase the die allocation and will be applicable during all phases of decommissioning. Note that SALP is not performed for decommissioning reactors.		
	04/23/03	IMC 2561 (Decommissioning Power Reactor Inspection Program) has been revised to reflect recent changes in the program.		
	ML17348A400 03/06/18 CN 18-007	Revised the manual chapter to reflect updates in the overall decommissioning reactor inspection program and reflect the changes to the core and discretionary inspection procedures.	None	ML17362A141