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# Standard Review Plan Maintenance Program Implementing Procedures Document

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U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation



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Division of Inspection and Support Programs  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
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## **Abstract**

The Implementing Procedures Document (IPD) was developed by the Inspection Program Projects Branch, Office of Nuclear Reactor Regulation, with assistance from Pacific Northwest National Laboratory, for the Standard Review Plan Maintenance Program (SRP-MP). The SRP-MP was established to maintain the Standard Review Plan (SRP) on an on-going basis. The IPD provides guidance, including an overall approach and procedures, for SRP-MP tasks. The objective of the IPD is to ensure that modifications to SRP need to reflect current NRC requirements and guidance are identified and that a consistent methodology is used to develop and revise SRP sections.

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## Executive Summary

The Nuclear Regulatory Commission (NRC) Office of Nuclear Regulation (NRR) has established a program, the Standard Review Plan Maintenance Program (SRP-MP), to address the on-going maintenance of the SRP. This Implementing Procedures Document (IPD) establishes the guidance and procedures to implement the SRP-MP.

The SRP was first issued in 1975 as NUREG-75/087. The SRP was extensively revised in 1981 and subsequently issued as NUREG-0800. In 1991 the Standard Review Plan Update and development program (SRP-UDP) was established to update the SRP for use in reviewing future reactor design applications. The SRP-UDP was completed and the revised SRP was issued for public comment in 1996. The SRP-MP was established following the completion of the SRP-UDP to maintain the SRP on an on-going basis.

The SRP and SRP-MP are described in Chapter 1 of this IPD. Chapter 2 describes the methods for periodically identifying and reviewing documents that contain information which is potentially relevant to the maintenance of the SRP. Chapter 3 describes the methods for assessing the need for SRP modifications and developing draft SRP sections. Chapter 4 addresses the process for the review and approval of SRP sections. Chapter 6 describes independent work review guidelines for SRP-MP tasks. Chapter 7 other regulatory development activities relevant to the SRP are coordinated with SRP-MP.

In order to produce high quality and consistent SRP modifications, it is intended that NRC staff as well as contractor staff involved in the modification of the SRP will follow this Implementing Procedures Document.

# 1 Introduction

The U.S. Nuclear Regulatory Commission's (NRC's) Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants (SRP) provides guidance to the Office of Nuclear Reactor Regulation (NRR) staff performing safety reviews of license applications for the construction, operation, and modification of nuclear power plants. The SRP was extensively revised and issued for public comment in 1996. The NRC has undertaken a program to maintain the SRP on an on-going basis. This Implementing Procedures Document contains the approach and procedures for the tasks to be performed in maintaining the SRP. Some of the tasks described in this document will be performed by NRC staff and others by NRC contractor personnel. However, all regulatory decisions will be made by the NRC.

## 1.1 Background and History of the SRP, Including Its Modifications

The SRP was first issued in 1975 as NUREG-75/087. It evolved from many years of NRC staff experience in establishing safety requirements and applying them in safety evaluations of nuclear facilities. Use of the SRP as a routine tool for the NRC staff in the safety evaluation of nuclear power plants was established by NRR Office Letter No. 2, dated August 12, 1975.

The NRC undertook a major program to revise NUREG-75/087, culminating in a new edition of the SRP issued in July 1981 as NUREG-0800. This revision program had three major objectives: (1) to more completely identify the NRC requirements that are relevant to each review topic; (2) to more fully describe how the review determines that safety requirements have been met; and (3) to incorporate a number of newly established regulatory positions. To accomplish these objectives and to conform the SRP to the revised NRR organization, some SRP sections were added, deleted, split, or combined.

NRR Office Letter No. 800 dated November 24, 1987, established a procedure for NRC management approval of SRP revisions. Office Letter No. 800 distinguished Type I revisions, which represent accepted NRC positions and may be issued without public comment, and Type II revisions,

which represent new positions and are issued following public comment.

In 1991, the Standard Review Plan Update and Development Program (SRP-UDP) was established to update NUREG-0800 for use in reviewing future reactor design applications. NUREG-1447, "Standard Review Plan Update and Development Program - Implementing Procedures Document" (IPD), was issued in May 1992 to describe the SRP-UDP and establish the procedures for updating the SRP. Prior to the SRP-UDP, the SRP had not undergone a general revision since 1981, although 21 individual SRP sections had been revised. The objectives of the SRP-UDP were to update the SRP to reflect the substantial changes in regulation and regulatory guidance that occurred since the 1981 revision of the SRP and to reflect the experience of the safety reviews conducted of design certification applications for evolutionary nuclear plants. The revised SRP included several new SRP sections and was issued for public comment in 1996.

In addition to revising the SRP to reflect new regulatory requirements and guidance, the following significant changes were also implemented during the SRP-UDP: (1) application of the NRC metrication policy; (2) resolution of NUREG-0933 Generic Issue B-3, as related to the SRP; (3) reconciliation of TMI Action Plan Items; (4) addition of Technical Rationale for Acceptance Criteria; and (5) changes related to the 10 CFR 52 licensing process.

Following preparation of the 1996 revision of the SRP for public comment, the NRC established the Standard Review Plan Maintenance Program (SRP-MP) to maintain the SRP on an on-going basis.

## 1.2 Purpose and Scope of the SRP

The main purposes of the SRP are to ensure the quality and uniformity of staff reviews, to present a well-defined base from which to evaluate future reactor applications and to provide the public with NRC's interpretation of an "acceptable level of safety" for light water reactor facilities. The SRP makes information about the NRC's approach to reactor safety regulation widely available and improves understanding of the staff review process by interested

members of the public and the nuclear power industry. In short, the SRP plays a primary role in ensuring that the NRC staff performs an adequate review and that all plants licensed include those features that are essential to protect the public health and safety.

The SRP provides guidance for the safety review of construction permit applications, operating license applications, final design approval and design certification applications, and requests for amendment of operating licenses. The SRP currently addresses only light water reactors (pressurized-water reactors and boiling-water reactors) of conventional design.

NRR staff's safety review of nuclear power plant license applications is based on the information provided in the applicant's Safety Analysis Report required by 10 CFR Section 50.34--in the case of a construction permit application, the Preliminary Safety Analysis Report; in the case of an operating license application, the Final Safety Analysis Report. Applications for design certifications and combined licenses must meet the technical content requirements of 10 CFR Sections 52.47 and 52.79, respectively, which incorporate by reference the applicable requirements of 10 CFR 50.34.

The Safety Analysis Report is the primary means by which the applicant provides the information to enable the reviewing staff to determine whether the proposed plant can be built and operated without undue risk to the health and safety of the public. This determination is documented in the Safety Evaluation Report prepared by the reviewing staff at the conclusion of their review.

### 1.3 Structure of the SRP

The structure of the SRP reflects its purpose and scope. Each section of the SRP describes a specific review performed by the NRC Staff. In general, the numbering of SRP sections corresponds to the sections of Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants - LWR Edition." As shown in Table 1.1, the SRP sections are grouped into chapters, each of which addresses a general topic.

The Appendix to this Implementing Procedures Document provides a detailed description of the organization and format for SRP sections. The following summarizes the six subsections of an SRP section:

**Table 1.1 Chapters of the Standard Review Plan**

1. Introduction and General Description of Plant	11. Radioactive Waste Management
2. Site Characteristics	12. Radiation Protection
3. Design of Structures, Components, Equipment, and Systems	13. Conduct of Operations
4. Reactor	14. Initial Test Program
5. Reactor Coolant System and Connected Systems	15. Accident Analysis
6. Engineered Safety Features	16. Technical Specifications
7. Instrumentation and Controls	17. Quality Assurance
8. Electric Power	18. Human Factors Engineering
9. Auxiliary Systems	19. Severe Accidents
10. Steam and Power Conversion System	

**Subsection I - Areas of Review**, describes the scope of the review for which that SRP section provides guidance: that is, it specifies what is being reviewed by the NRR branch having primary review responsibility (primary review branch) and required input from other review branches (Secondary Review Branch). This subsection contains a description of the systems, components, analyses, data, or other information on which the review will be based. Areas of Review also contains a sub-subsection, Review Interfaces, that identifies the review performed by other branches used by the primary review branch in its overall review under this SRP section.

**Subsection II - Acceptance Criteria**, identifies which NRC requirements are applicable, and the specific criteria for determining the acceptability of the design or the programs within the scope of the area of review of the SRP section. A discussion is provided to describe the safety rationale associated with selecting and applying specific regulatory requirements to the area being reviewed in the SRP section.

**Subsection III - Review Procedures**, identifies the general steps that the reviewer is to follow in performing the review.

**Subsection IV - Evaluation Findings**, states the conclusion that the reviewer is expected to reach following completion of the review. Such a conclusion is included in the staff's Safety Evaluation Report, which combines the staff's findings under all the SRP sections.

**Subsection V - Implementation**, provides guidance to applicants and licensees regarding the staff's plans for use of the SRP section and its applicability.

**Subsection VI - References**, lists the references used in the review process.

## 1.4 Revisions to the SRP

The SRP is intended to provide complete and comprehensive guidance for staff review of applicant submittals within its scope. The Standard Review Plan is the result of many years of experience by the staff in establishing and using regulatory requirements to evaluate the safety of nuclear power plants and the review of Safety Analysis Reports. The Standard Review Plan may be considered part of a continuing regulatory standards development activity that not only documents current methods of review but also

provides a basis for orderly modifications of the review process in the future.

The Commission disseminates information regarding current safety issues and proposed solutions through various means such as generic communications, proposed rules, proposed NRC regulatory guides, and generic safety issues. In the interim period prior to publication of a revised SRP, safety review of information provided by applicants will also include consideration of these on-going safety issues in addition to the criteria contained in the SRP. As these safety issues are resolved and regulations and guidance are finalized and promulgated, the SRP will be revised as necessary. An SRP Modification Data Base (MDB) is maintained that identifies these issues and documents related to the scope of reviews currently addressed in the SRP.

The SRP will be maintained current by periodic revision to reflect new NRC requirements and guidance relevant to licensing reviews. The criteria and procedures for evaluating the need for SRP revisions are described in Section 3.2 of this Implementing Procedures Document. Until a revision to the SRP section is published, the NRC will maintain and publish annually a list of the additional issues that will be considered in the review of license applications. The SRP revision in effect at any time consists of the published SRP plus these additional issues.

## 1.5 Purpose and Maintenance of this Implementing Procedures Document

The NRC has established the Standard Review Plan Maintenance Program (SRP-MP) to maintain the SRP on an on-going basis. This Implementing Procedures Document provides guidance, including an overall approach and procedures, for each of the tasks involved in the on-going development and maintenance of the SRP. In order to produce high quality and internally consistent SRP modifications, all NRC staff as well as all contractor staff involved in the modification of the SRP will follow this Implementing Procedures Document. This Implementing Procedures Document requires the recording and entry of data into the SRP Modification Database (MDB).

This Implementing Procedures Document will be a living document used to keep the SRP current. Accordingly, the Implementing Procedures Document itself will be revised

over time to reflect the experience and knowledge gained during its use and to reflect evolving NRC requirements and priorities.

## 1.6 Definitions

### 1.6.1 NRC Organizations

*Generic Issues and Environmental Projects Branch (PGEB), NRR* - is the branch responsible for managing the SRP Maintenance Program.

*Primary Review Branch (PRB)* - with respect to a particular SRP section, is the NRR branch that is assigned primary responsibility for conducting the review within the scope of the SRP section. The responsible PRB is specified at the beginning of each SRP Section.

*Secondary Review Branch (SRB)* - with respect to an SRP section, is a branch which has responsibility for certain technical issues found in the SRP section, but not the SRP section in its entirety. The SRB provides safety evaluation input to the PRB. The responsible SRB(s) is/are specified at the beginning of each SRP Section.

### 1.6.2 Databases

*SRP Modification Database (MDB)* - is the database established to catalog SRP modification-related data and information, to track SRP modification activities, and to facilitate administrative and management control of the SRP Maintenance Program.

*Text Retrieval System (TRS)* - is the database established to store full text versions of documents being used in the SRP Maintenance Program.

*Automated SRP* - is the system that contains an electronic copy of the SRP.

### 1.6.3 Position Titles

*Analyst* - refers to the individual performing work under any procedure except Procedure 6.0 and excluding management activities (e.g., assignment of analysts).

*Reviewer* - refers to the individual who performs an independent review of work according to the guidance provided in Procedure 6.0.

### 1.6.4 SRP Sections

*SRP Sections* - for purposes of the SRP Maintenance Program, are the fundamental units of the SRP. They contain the complete review procedures for a given review topic. Each SRP section currently contains six subsections, numbered from I through VI. Some SRP sections include appendices and Branch Technical Positions (BTPs).

### 1.6.5 SRP-MP Process

*Potential Impact* - is a discrete requirement, NRC Staff position, or other item of information identified from analysis of documents that may have relevance to revising the SRP. Potential Impacts are specific to an individual SRP section. As such, a potential impact defines a relationship between a single item of information from a document and a specific SRP section.

*Integrated Impact* - describes an issue that is relevant to revision of the SRP. An integrated impact references one or more potential impacts and describes how the issue impacts the existing SRP. Integrated impacts contain a specific proposal related to modifying the SRP.

*Revision Options Checklist* - documents how an issue described in an integrated impact was actually addressed in a revision to the SRP. The revision options checklist summarizes the analytical work performed during the development of the revision, including the resolution of any conflicting information or criteria. The revision options checklist also documents a determination of the SRP revision type (see Subsection 1.6.6) which establishes review and approval requirements for the revision.

### 1.6.6 Types of SRP Revisions

*Type I Revisions* - revisions that incorporate requirements or guidance that have received public comment and have been approved by the Director, NRR and for which additional public comments are not necessary. Changes that are clearly administrative or clarifying in nature. Accepted NRC positions are taken from approved regulatory documents including positions documented in Safety Evaluation Reports. Also included are revisions that

incorporate new positions that have been approved by the Director, NRR, and by CRGR and EDO as being so clearly needed that a public comment period would cause unacceptable delay in implementing them.

*Type II Revisions* - revisions that incorporate proposed new or revised requirements, positions, or guidance that have not been previously reviewed and approved, including new SRP sections, and are issued for public comment.

### 1.6.7 Reactor Terminology

*Evolutionary Reactors* - light water reactors that include some advanced design features, but are considered evolutionary developments of current nuclear plant designs (such as the General Electric ABWR and the ABB/Combustion Engineering System 80+).

*Advanced Reactors* - include both passive light water reactors (such as the Westinghouse AP 600, the ASEA/Brown Boveri PIUS, the General Electric SBWR, and the ABB/Combustion Engineering SIR) and non-light water reactors (such as the AECL CANDU-3, the General Atomics MHTGR, and the General Electric PRISM).

*Future Reactors* - refers to both evolutionary and advanced reactors.

## 1.7 NRR Responsibilities Regarding SRP Modifications

NRR staff responsibilities regarding SRP modification are as follows:

### Director, NRR

- Establishes and coordinates NRR SRP policies, guidance, and programs.

### Associate Director for Inspection and Technical Assessment, NRR

- Assigns Primary and Secondary Review Branch responsibilities for SRP sections to branches within the associate directorship.

### Director, DRPM, NRR

- Approves all SRP revisions and additions.

### Generic Issues and Environmental Projects Branch (PGEB), NRR

- Responsible for the overall management and coordination of the SRP Maintenance Program.

### Primary Review Branch, NRR

- Responsible for revisions and additions to assigned SRP sections and maintains this primary responsibility even when another NRR branch or NRC office performs the majority of the work involved in the revision.
- Is responsible for determining whether an SRP section requires revision and selects one of the following options for performing the revision: (1) performs the SRP revision in-house; (2) enlists a contractor of its choosing to either perform or assist in performing the revision; (3) requests the Generic Issues and Environmental Projects Branch (PGEB), NRR, to prepare, with contractor assistance, an initial draft of the revision. The PRB remains responsible for revision of the section, regardless of the option chosen.
- Ensures that the appropriate NRR organizations and other NRC offices are given the opportunity to participate in the revision of SRP sections.
- Reviews all proposed modifications to the assigned SRP sections to ensure that they are consistent with applicable NRC policies and guidance.
- Coordinates its activities pertaining to revisions or additions with appropriate Secondary Review Branches.

### Secondary Review Branch, NRR

- Is responsible for an assigned technical area with respect to an SRP section.
- Provides proposed changes and review and comment on draft changes prepared by others to the Primary Review Branch in a timely manner.

## 2 Identification and Review of Documents

An important aspect of maintaining the SRP is identifying and reviewing documents that contain requirements, guidance, staff positions, and other potentially relevant information. Chapter 2 specifies the methods for identifying and reviewing documents that contain information which is potentially relevant to the maintenance of the SRP. The information from these document reviews is used in the subsequent SRP maintenance tasks described in Chapter 3 of this Implementing Procedures Document.

Chapter 2 is organized as follows:

- **Section 2.1, Documents** - the approach is described for identifying and obtaining documents pertinent to maintaining the SRP. This section also describes the SRP-MP Text Retrieval System (TRS) and the procedures for its maintenance.
- **Section 2.2, Identifying Potential SRP Impacts** - the approach and procedures are described for identifying specific SRP potential impacts resulting from the analysis of pertinent documents.
- **Section 2.3, New and Revised Regulatory Document Analysis** - the approach and procedures are described for performing periodic analysis of new or revised regulatory documents added to the Text Retrieval System.
- **Section 2.4, Industry-Consensus Codes and Standards** - the approach and procedures are described for identifying new or revised industry-consensus codes and standards that may be pertinent to maintaining the SRP.

### 2.1 Documents

#### 2.1.1 Approach

Information potentially relevant to maintaining the SRP is contained in numerous NRC documents as well as documents originating from the NRC's contractors, industry, and the technical community. The purpose of Section 2.1 is to describe specific documents that are considered in the maintenance of the SRP and the database used in the SRP-MP to collect and work with these documents. Section 2.1

also describes the procedures that SRP-MP personnel and other NRC staff use to identify and obtain these documents.

Documents that meet the following three criteria are likely to be relevant to maintenance of the SRP:

1. The document has the potential to provide information useful in revising SRP sections for future nuclear power plant applications, making Type I versus Type II revision determinations, establishing bases for Acceptance Criteria, or revising SRP sections for unique technology or unique applications of existing technology in future reactor designs.
2. The document contains regulatory requirements, accepted NRC positions or guidance or otherwise has sufficient technical authority to merit consideration for use in revising or developing the SRP. Documents are generally considered to have sufficient technical authority if they meet one or more of the following criteria:
  - The document was issued by the Commission or staff for use by staff or licensees and is generic in nature (this includes reports and generic correspondence).
  - The document is a formal report of work performed by a contractor for the NRC, has generic application, and has been endorsed by the NRC in the licensing process.
  - The document was prepared by an organization that clearly has the expertise to address the technical issues involved (e.g., vendor reports describing its designs or product lines) and is referenced by the NRC in support of a generic staff position.
  - The document was prepared by individuals recognized as experts in their fields or has been peer reviewed by such individuals and has direct reference to NRC generic positions.
3. The document contains information that is generically applicable.

### The SRP-MP Text Retrieval System

The SRP-MP Text Retrieval System (TRS) is a searchable full text regulatory document database used in support of SRP maintenance activities. The TRS serves the following two primary purposes relative to the SRP-MP:

- The TRS supports the analysis of documents for potential SRP impacts. The TRS has a full text search capability that aids in this process.
- The TRS supports documentation of SRP revisions and the development of new SRP sections. To the extent practical, and consistent with applicable restrictions (e.g., copyright, proprietary information, etc.), the TRS contains documents that are referenced by the SRP and the documents that were used to develop SRP revisions and new SRP sections.

The TRS is intended to be a high-quality database that serves as a useful tool to persons involved in SRP-MP activities and to other NRC staff that find the data and search capabilities of the TRS useful. The database may contain errors and omissions in the documents represented in the database. These errors and omissions result from practical limitations of the methods used to convert documents into TRS compatible data formats. The TRS does not replace the documents represented in the database. Final technical decisions and legal determinations shall be made using appropriately controlled versions of the documents represented in the TRS, and not the TRS alone.

The TRS contains a wide variety of documents, including many of the NRC's principal regulatory documents. The TRS is periodically updated to incorporate the latest regulatory documents applicable to the maintenance of the SRP. The following document categories contained in the TRS have been judged likely to contain documents meeting the above stated criteria for applicability to the SRP-MP:

- NRC Regulations (Rules) - The NRC's rules in 10 CFR Parts 0-199 include the basic regulatory requirements governing the licensing and operation of nuclear power plants.
- NRC Policy Statements - From time to time, the NRC issues Policy Statements, which authoritatively set forth the NRC's position on matters within the scope of the policy.

- Regulatory Guides - Regulatory Guides are published by the NRC to inform applicants, licensees, the nuclear industry, and the public of various solutions and approaches to meeting requirements that are acceptable to the NRC staff. However, they are not the only possible solutions and approaches to meeting regulatory requirements.
- NRC Generic Letters - Generic Letters are prepared to inform applicants and licensees of regulatory requirements related to licensing and schedules for compliance. These letters include requests for licensee information pursuant to 10 CFR § 50.54(f) and are also used to clarify NRC policy.
- NRC Bulletins - Bulletins transmit information to licensees regarding safety, safeguards, or environmental matters and may request specified actions and a written response.
- NRC Circulars - Now discontinued, NRC Circulars were issued to licensees to provide information on a somewhat less urgent basis than Bulletins.
- NRC Information Notices - Information Notices are issued to licensees to provide information that may be relevant to safety, safeguards, or environmental issues.
- NUREG-0737 - The TMI Action Plan, issued as NUREG-0737, describes certain NRC decisions and actions taken or to be taken as a result of the Three Mile Island accident.
- NUREG-0933 - Summarizes Unresolved Safety Issues, Generic Safety Issues, and Three Mile Island action items. This document describes the current status of these issues and any actions taken to resolve the issues.
- Safety Evaluation Reports (SERs) for Evolutionary and Advanced Reactors - These reports document the NRC staff review of proposed future nuclear plant designs. These reports reflect recent staff thinking on a wide range of safety issues including the application of new technologies in nuclear plant designs.

Several of the document types included in the TRS will not be directly considered in tasks associated with the SRP Maintenance Program because they are not generic in scope, do not represent staff resolutions of issues, or do not otherwise meet the three criteria set forth above. Examples

of the document types not considered include; Licensee Event Reports, Systematic Assessment of Licensee Performance reports, and the NRC Enforcement Manual.

### Industry Codes and Standards

The SRP, as well as many of the other documents in the Text Retrieval System, makes frequent reference to the codes and standards of such industry and professional groups as the American National Standards Institute, the American Nuclear Society, the American Society for Testing and Materials, the American Society of Civil Engineers, the American Society of Mechanical Engineers, the Institute of Electrical and Electronics Engineers, and many others.

A listing of industry consensus codes and standards referenced in regulatory documents has been developed, and is periodically updated, for the purpose of supporting SRP-MP activities. This listing has been published as NUREG/CR-5973, "Codes and Standards and Other Guidance Cited in Regulatory Documents." In addition to identifying cited codes and standards, NUREG/CR-5973 also identifies the latest versions of cited codes and standards and characterizes the nature of the regulatory citations for the purposes of SRP-MP activities.

Due to copyright considerations, codes and standards are not incorporated in the TRS. Section 2.4 of this Implementing Procedures Document describes how codes and standards are addressed in the SRP-MP.

### Other Documents

The SRP and the other documents in the Text Retrieval System contain numerous references to documents that support stated positions or otherwise contain related information other than those described above. The following are some examples:

- **Technical Reports** - NRC's contractors as well as reactor vendors and owner groups prepare technical reports that may support NRC positions or NRC-endorsed guidance or illustrate solutions to safety issues that the NRC staff has found acceptable in the past. As such, these documents may contain potential SRP impacts.
- **Technical Literature** - The scientific and technical literature that supports NRC positions may include information with potential SRP impacts. This literature includes articles in technical journals, staff and contractor

reports issued by other federal agencies (such as the Department of Energy, the Environmental Protection Agency, the National Institute of Standards and Technology, the National Oceanic and Atmospheric Administration, the Army Corps of Engineers, and others), monographs, and conference proceedings.

- **NUREG Reports** - NUREG reports address a variety of topics that may potentially impact the SRP. These documents are formal reports on regulatory, technical, and administrative issues of interest to the NRC staff, industry, other governmental entities, and the public.

These other documents do not normally meet all of the previously discussed criteria for documents that are relevant to the maintenance of the SRP, particularly the criteria related to generic applicability. These other documents potentially impact the SRP when a document that does meet the criteria cites these other documents in a manner that establishes generic applicability.

Where practical and where copyright restrictions allow, these other documents may be added to the Text Retrieval System when it is determined that a specific document is relevant to the SRP-MP.

## 2.1.2 Procedure for Routine Maintenance of the Text Retrieval System

### Purpose and Scope of this Procedure

The purpose of this procedure is to periodically identify new or revised regulatory documents with potential SRP impacts and to make these documents available in the Text Retrieval System.

### Prerequisites for Performing this Procedure

1. The TRS has been established and has been deployed to those sites where SRP-MP activities are performed.
2. Agreements and permissions have been obtained regarding the use and distribution of TRS software and data (i.e., electronic versions of regulatory documents).
3. Arrangements have been made to convert hard-copy documents into an electronic format compatible with the TRS with in-house and/or contractor organizations under approved procurement procedures.

### Overview of this Procedure

The Text Retrieval System has been established to store full text versions of regulatory documents relevant to maintenance of the SRP in order to facilitate SRP-MP activities. The types of regulatory documents that are likely to be significant to SRP maintenance have been identified. As new documents of these types are issued, copies of these documents are obtained in either hard-copy or electronic form. These documents are then processed (scanned, converted, etc.) as necessary and entered in the Text Retrieval System. Updated versions of the Text Retrieval System data are then made available to NRC staff and other staff involved in SRP-MP activities. Documents added to the TRS under this procedure are reviewed for potential SRP impacts under Section 2.3.

### Procedure

1. On at least an annual basis, identify new regulatory documents in the document categories identified in Section 2.1.1 that have been issued or revised since the last update of the TRS.
2. Determine whether the document is available in electronic format from either the organization that developed the document, NRC online information systems, or through a service to which the NRC subscribes.
3. Obtain a copy of the document, preferably in electronic format. In cases where the document is not readily available in-house, select a source that best meets SRP-MP needs (cost, schedule, document format compatibility, etc.).
4. If the document is a hard-copy, arrange to have the document converted to an electronic format compatible with the TRS.
5. Prior to entering newly converted documents in the TRS database, take reasonable steps to ensure the converted version of the document accurately represents the original document.
6. Transfer the new or revised documents to the TRS database and create updated search indexes of the revised document set.
7. Update the TRS data at all online sites.

### 2.1.3 Procedure for Identifying Other Documents

#### Purpose and Scope of this Procedure

This procedure provides a means to identify relevant documents, other than those routinely identified under Procedure 2.1.2, that may contain potential SRP impacts. These documents may be identified in the course of performing other SRP-MP activities or by NRC staff not directly involved in SRP-MP activities. These other documents will be added to the TRS where practical and where adding these documents to the TRS is compliant with copyright and NRC procedural restrictions.

This procedure may also be used to accommodate NRC staff requests to add documents to the TRS that are not specifically relevant to SRP-MP activities but are useful to the staff for other purposes. In this case, the portions of this procedure related to establishing a document's relevance to the SRP and reviewing the document for potential SRP impacts are not applicable.

#### Prerequisites for Performing this Procedure

The prerequisites for performing this procedure are the same as those for Procedure 2.1.2.

#### Overview of this Procedure

Any NRC staff person may identify documents that may contain potential SRP impacts or may otherwise be relevant to SRP-MP activities. After being identified, these documents are reviewed for relevance to the SRP-MP and a determination is made as to the practicality of incorporating the document in the TRS. The documents in this category can be originated by wide variety of different sources and may contain information that must be restricted in some manner. As such, it must be established that the document can be included in the TRS within copyright and NRC procedural restrictions. These other documents are then either added to the TRS using the applicable portions of Procedure 2.1.2, or a copy of the document is housed in the SRP-MP library.

### Procedure

1. Requests to consider a document for potential SRP impacts may be made by NRC staff in person, by telephone, or in writing.
2. Determine if the document meets the criteria of Section 2.1.1 regarding the likelihood of the document containing potential SRP impacts and verify that the document has not been previously reviewed for potential SRP impacts.
3. If the document does not meet the criteria for documents likely to contain potential SRP impacts or, if the document was already reviewed, notify the requester immediately what actions have already been taken with regard to the document. No further action is required under this procedure.
4. If the document is not available in-house:
  - a. Determine the document source to be used. Select a source that best meets SRP-MP needs (cost, schedule, document format compatibility, etc.).
  - b. Make necessary arrangements for obtaining the document. Procurement will be accomplished in accordance with established procedures.
5. Where practical, documents identified under this procedure should be added to the TRS as follows:
  - a. If the document is not sourced from the NRC, determine if the document can be incorporated in the TRS within copyright restrictions. Obtain any required permissions or agreements from the originator of the document.
  - b. Verify that the document can be incorporated in the TRS within NRC policy and procedures. Documents in the TRS shall not contain proprietary or pre-decisional information.
  - c. Process as necessary and add the document to the TRS per the applicable portions of Section 2.1.2.

If the document is not added to the TRS, a copy of the document should be retained in the SRP-MP library.

6. The document should be reviewed for potential SRP impacts as follows.
  - a. If analysis of the document for potential SRP impacts is not likely to involve substantial resources beyond that required for normal periodic SRP maintenance activities, analysis of the new document may be incorporated in the periodic analysis activity described in Section 2.3.
  - b. If analysis of the document will involve substantial resources that cannot be accommodated within the routine scope of Section 2.3, analysis of the document should be addressed as a Candidate for Future Work. Procedures for addressing Candidates for Future Work are provided in Chapter 7.0.
7. Inform the requestor of actions taken or planned to review the identified document for potential SRP impacts.

## 2.2 Identifying Potential SRP Impacts

### 2.2.1 Approach

This section describes the process used to identify potential SRP impacts contained in documents described in Section 2.1. The term "potential impact" is used in the SRP-MP to describe the result of identifying a document, or portion of a document, that may be relevant to maintaining the SRP. Potential impacts identified under this procedure have the following significant characteristics:

- A potential impact addresses a single topic (regulatory requirement, NRC Staff position, or other item of information) relevant to maintaining the SRP.
- A potential impact is related to a specific SRP section.
- Potential impacts are identified in a liberal manner; a potential impact, in-and-of-itself, does not establish a need to revise the SRP.

Potential impacts are used to identify links between documents relevant to maintaining the SRP and specific SRP sections. Potential impacts facilitate the process of determining the need to revise an SRP section or develop new SRP sections. Once the need to revise the SRP is de-

terminated, potential impacts facilitate the analytical work necessary to prepare and document changes to the SRP.

A potential impact must meet one or more of the following criteria relative to one or more SRP sections:

1. Contains established staff positions, guidance, or generic requirements directed at applicants or licensees.
2. Contains conclusions or recommendations suggesting that current requirements or guidance are inadequate, overly restrictive, or otherwise need some revision.
3. Contains design or analysis information, or evaluation of design or analysis information, that can be used in establishing licensing requirements for evolutionary reactor designs.
4. Contains design or analysis information, or evaluation of design or analysis information, that can be used in establishing licensing requirements for future reactor designs.
5. Contains design, operational, or analysis information, or evaluation of design, operational, or analysis information, that can be used in establishing technical rationales for SRP Acceptance Criteria.
6. Contains backfit or other analyses, or requirement approvals that can be used in making Type I/Type II SRP change determinations.

The above six criteria are a more specific version of the three criteria discussed in Section 2.1.1. These six criteria are based on the specific uses envisioned for the information to be collected in SRP-MP program work.

Each potential impact identified should address a single topic. The topic may be broadly or narrowly defined by the analyst, depending on the nature of the subject, the relationship of the potential impact to the SRP, and the judgment of the analyst identifying the potential impact. If a given document or part of a document meeting any of the six review criteria addresses more than one topic, a separate potential impact should be identified for each topic addressed.

In general, the entirety of a potential impact should apply to the SRP section to which it is assigned. In cases where different issues in a document apply to different SRP

sections, several potential impacts should be created. As an example of the foregoing, consider 10 CFR 50.44. This regulation contains a number of requirements regarding combustible gas control. Two of those requirements (among a number of others) include the provision of hydrogen recombiners and training in the use of the recombiner equipment. Recombiners are appropriately addressed in SRP Section 6.2.5; training in SRP Section 13.2. Therefore, §50.44 should result in at least two different potential impacts. (In actuality, this regulation would result in additional potential impacts if all requirements contained therein were considered.)

All potential impacts should be identified and recorded, and there should be a reasonable expectation that the potential impact will relate in some way to an actual change to the SRP. A potential impact that appears somewhat insignificant when viewed in isolation may be important when considered in the context of other related potential impacts. Correlation of potential impacts and the elimination of insignificant potential impacts are addressed in Section 3.1.

Two different methods of identifying potential impacts are described in this procedure. The first method, called the "document-to-SRP method," requires that documents be reviewed in their entirety by analysts in order to find potential impacts. The analyst then uses the Text Retrieval System to assist in correlating potential impacts with the SRP sections that may be affected. The second method, called the "SRP-to-document method," identifies potential impacts associated with a given SRP section through use of electronic key-word searches of the TRS based on the content of that SRP section. The "SRP-to-document method" requires that documents being reviewed for potential impacts be entered in the Text Retrieval System and the "document-to-SRP method" does not. Both of these methods are described in this procedure.

### 2.2.2 Procedure for Identifying Potential SRP Impacts

#### Purpose and Scope of this Procedure

This procedure establishes guidance for reviewing documents to identify potential SRP impacts. It provides criteria for performing this review and a methodology to assist in assigning potential impacts to the specific SRP sections they affect.

### Prerequisites for Performing this Procedure

1. The Text Retrieval System, described in Section 2.1, is available.
2. Documents to be reviewed for potential impacts have been identified and obtained as described in Section 2.1.

### Overview of this Procedure

Potential impacts are identified using either a "document-to-SRP" or "SRP-to-document" method. In the "document-to-SRP" method, the analyst identifies potential impacts in a specific document and then, using the analyst's knowledge of the SRP or by performing searches of the Text Retrieval System, identifies those SRP sections that may be affected. In the "SRP-to-document" method, the analyst reviews a specific SRP section and then searches a defined set of documents for potential impacts using the search capabilities of the Text Retrieval System.

Potential SRP impacts are identified and assigned to specific SRP sections by an analyst using the analyst's knowledge and judgement. The process is assisted by the use of the Text Retrieval System (TRS). The potential impacts are recorded either on a form or directly in the SRP Modification Database (MDB). Potential impact forms are retained until such time that the data is entered in the MDB. Independent verification is performed in accordance with Chapter 6.0.

### Procedure

#### Document-to-SRP Method

1. If using a TRS version of a document for the potential impact review, verify that the document is complete (i.e., all referenced attachments and enclosures are present). If necessary, obtain a hard-copy of the document.
2. Identify any potential impacts contained in the document being reviewed by applying the six review criteria described in Section 2.2.1.
3. Assign each potential impact to the appropriate SRP section(s). If helpful, create search strings for each potential impact and use the TRS to assist in correlating potential impacts with SRP sections. If the potential

impact cannot be correlated to any existing SRP section:

- a. Select an SRP section that provides the best correlation between the subject of the potential impact and the SRP. This section will be used as basis for completing the required potential impact documentation.
  - b. Document the need to consider new SRP content development by completing a Research/Regulatory Action Need Form in accordance with Chapter 7.0.
4. Create a potential impact for each identified document-to-SRP section link. Record results of the review on the Potential Impact Identification Form or enter the information directly in the MDB.
  5. If a Potential Impact Identification Form was used, submit the form for data entry.

#### SRP-to-Document Method

1. Review the assigned SRP section and develop search strings to be used in TRS document searches.
2. Perform TRS searches using the search strings developed in Step 1.
3. Review each search "hit" identified in the TRS stored text.
4. Create a potential impact for each identified document-to-SRP section link. Record results of the review on the Potential Impact Identification Form or enter the information directly in the MDB.
5. If a Potential Impact Identification Form was used, submit the form for data entry.

### Forms

The Potential Impact Identification Form serves to record data that will be input into the SRP Modification Database. Use of the form is not required if the analyst records the data directly in the MDB. All organizations implementing this procedure must record their work either on the indicated form, an alternate form that incorporates the same information, or directly in the MDB.

**Potential Impact Identification Form**

Assigned Analyst \_\_\_\_\_

**Document Identification**

Document No \_\_\_\_\_

Document Title \_\_\_\_\_

\_\_\_\_\_

Document Revision \_\_\_\_\_ Document Date \_\_\_\_\_

**Impact Identification**

Impacted SRP Section No. \_\_\_\_\_

Reactor Type \_\_\_\_\_

Impact Size and Location:

\_\_\_\_\_ Entire Document \_\_\_\_\_ Block: From \_\_\_\_\_ To \_\_\_\_\_

Impact Summary \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Potential Impact Identification Form (Continued)**

TRS Search Index(es) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

TRS Search Strings \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Impact Criteria:**

- \_\_\_\_\_ 1. Staff position, guidance, or requirement
- \_\_\_\_\_ 2. Suggestion that requirement or guidance needs revision
- \_\_\_\_\_ 3. Information that can be used for establishing criteria bases or licensing requirements for evolutionary reactors
- \_\_\_\_\_ 4. Information that can be used for establishing criteria bases or licensing requirements for advanced reactors
- \_\_\_\_\_ 5. Information that can be used for establishing technical rationales for Acceptance Criteria
- \_\_\_\_\_ 6. Information that can be used for making Type I/Type II determinations

Analyst Signature \_\_\_\_\_ Date \_\_\_\_\_

**Data Entry Information**

MDB Assignment Number \_\_\_\_\_ Potential Impact Number \_\_\_\_\_

## How to Complete the Form

The following are summary instructions for completing the Potential Impact Identification Form. More detailed instructions, including instructions for entering data directly in the MDB, is available in the MDB user's manual.

*Assigned Analyst* - Person's name that identified the potential impact.

*Document No.* - A number that uniquely identifies the document (e.g., GL 94-01) that contains the potential impact. For regulatory documents, use document type prefixes that correspond to document type codes used in the MDB (refer to MDB user's manual).

*Document Title* - Title of the document that contains the potential impact.

*Document Revision/Document Date* - The revision and/or date of the document that contains the potential impact.

*Impacted SRP Section No.* - The number of the SRP section impacted.

*Reactor Type* - Normally the reactor type should be consistent with the reactor type associated with the SRP section (Generic, Generic PWR, or Generic BWR). If the potential impact is being developed from a Safety Evaluation Report (SER), the reactor type should be consistent with the specific reactor type being addressed by the SER (ABWR, CE80+, or others as may be added to the MDB).

*Impact Size and Location* - This information is used to indicate if the entire document or a specific portion of the document forms the basis of the potential impact. Do not over-use the Entire Document designation. If more than one location in the document relates to the potential impact, multiple locations can be identified.

*Impact Summary* - This field provides a brief one or two paragraph description of the impact. If the potential impact is identifying a concise requirement, criterion, or recommendation, simply state the information as it appears in the document. If the potential impact involves a complex set of information, use judgement and develop a summary with an appropriate level of detail. Potential impacts will be integrated to establish the basis for possible changes to the SRP as described in Section 3.1. It is important that the

potential impact summary convey sufficient information to ensure that another analyst will understand how the potential impact was intended to relate to the content of the SRP section.

*TRS Search Index(es)/TRS Search Strings* - The TRS search index(es) and search strings used that resulted in the identification of the potential impact. This field is only used for potential impacts identified using the SRP-to-Document method (enter "None" in this field if the Document-to-SRP method was used). Search indexes indicate the scope of documents searched and the revision of the TRS data used during the search.

*Impact Criteria* - Indicates the pertinent potential impact criteria. Check all criteria that apply; however, at least one criterion must be checked. Some guidelines regarding the assignment of impact criteria are:

- Most potential impacts are assigned impact criterion 1 and/or 5.
- Potential impacts associated with CFRs, Regulatory Guides and Policy Statements are normally assigned an impact criterion 1.
- Generic Letters are assigned an impact criterion 1 if the Generic Letter includes a staff position or guidance.
- Impact criteria 3 and 4 are assigned for potential impacts that *only* affect future reactor designs.

*MDB Assignment Number/Potential Impact Number* - This information is created by the MDB during data entry and used to uniquely identify the potential impact.

## 2.3 New and Revised Regulatory Document Analysis

### 2.3.1 Approach

Maintaining the SRP requires that new and revised regulatory documents be identified and reviewed for potential SRP impacts. Section 2.1 describes how documents are identified and the process of updating the Text Retrieval System. As relevant documents are identified, they are either reviewed for potential impacts as part of the routine SRP-MP activity described in this section or a special analysis task is developed. Identified potential impacts are

then evaluated to determine if there is a need to revise the SRP as described in Chapter 3.

Any documents identified in accordance with Section 2.1 may be reviewed under this process; however, new or revised documents of the following types periodically added to the Text Retrieval System are normally evaluated:

- NRC Regulations (Rules)
- NRC Policy Statements
- Regulatory Guides
- NRC Generic Letters
- NRC Administrative Letters
- NRC Bulletins

PGEB makes the determination if an identified document is reviewed under this procedure or if a special analysis task should be developed. In general, documents that require extensive resources to review or involve unique review criteria are addressed under special analysis tasks (e.g., the analysis of a Safety Evaluation Report issued in support of a design certification application). In any case, the review process of Section 2.2 is used to perform the actual document analysis.

### 2.3.2 Procedure for Routine Regulatory Document Analysis

#### Purpose and Scope of this Procedure

This procedure establishes guidance for reviewing new or revised regulatory documents to identify potential SRP impacts. This procedure is normally performed anytime the Text Retrieval System data is updated.

#### Prerequisites for Performing this Procedure

The Text Retrieval System has been updated to include new or revised regulatory documents as described in Section 2.1.

#### Overview of this Procedure

The Text Retrieval System (TRS) is periodically updated to incorporate any new or revised regulatory documents as

described in Section 2.1. Following each TRS update, a list is developed of the new or revised regulatory documents that have been added to the TRS. This list of documents is then subjected to a screening process to identify those documents that have an application with respect to SRP-MP. A review for potential impacts is then performed in accordance with Section 2.2. Independent verification is performed in accordance with Chapter 6.0.

#### Procedure

1. Following each TRS update, a special TRS index is developed that indicates those documents in the TRS that have been added or updated. The index is referred to as the "delta index." Using the TRS, print a list of all documents identified in the delta index.
2. Delete any documents from the list that are not associated with the document types identified in Section 2.3.1, except draft Regulatory Guides.
3. Screen each document identified on the list resulting from Step 2 by reviewing the document list and identifying those documents that have no obvious application with respect to the SRP (e.g., a Regulatory Guide applicable to fuel manufacturing plants).
4. Perform a detailed review of each remaining document on the list for potential SRP impacts using the Document-to-SRP method of Section 2.2.
5. For each potential impact identified, determine if work is currently in progress to revise the relevant SRP section in accordance with the procedures of Chapter 3. If any such work is in progress, notify PGEB. PGEB will make the determination if the potential impact should be addressed within the scope of the in-progress revision effort or deferred to the next SRP revision cycle.
6. Documentation resulting from the performance of this task are the potential impacts developed during the review of new or revised regulatory documents added to the TRS. The potential impacts may be recorded on Potential Impact Identification Forms (Section 2.2), or entered directly in the SRP Modification Database (MDB).

## 2.4 Industry-Consensus Codes and Standards

### 2.4.1 Approach

Codes and standards referenced in regulatory documents provide many of the specific acceptance criteria presented in the SRP. As part of the SRP-MP, codes and standards cited in regulatory documents are periodically re-evaluated to ensure that the most appropriate code and standard revisions are used in the SRP.

Industry-consensus codes and standards are developed in the following process. The participating members of a standards-writing group who represent the various interests of that industry (e.g., product manufacturers, material manufacturers, product users, utilities, insurers, designers, constructors, consultants, and regulators, whether local, regional, or national) develop a standard. An industry-consensus process does not approve, recommend, nor endorse any specific or proprietary design or manufacturing process. The standards-writing group members regularly meet on a formal basis to consider revisions of the current requirements, requests for interpretation of current requirements, and new requirements as dictated by technological development. The industry-consensus process satisfies the separate and distinct needs, requirements, and interests of its participants through a process of arriving at mutually agreed-upon rules.

NRC regulatory documents may endorse, either in whole or in part, industry-consensus codes and standards. "Endorse" in this case, means that the solutions and approaches contained therein are acceptable to the NRC staff, but that they are not required as the only possible solutions and approaches.

#### Maintenance of the Codes and Standards Citation Database

A database of NRC regulatory document industry codes and standards citations is maintained as part of the SRP-MP for the purpose of supporting SRP-MP activities. Information presented in the database includes the following: (1) the code or standard title, number, and date; (2) the NRC document containing the citation and date; (3) characterization of the citation, including whether the NRC document endorses the code or standard; (4) com-

ments related to the citation, and (5) current version and date of the cited code or standard.

The status of industry codes and standards citations are subject to continual change. Industry codes and standards are continually evolving. Also, the publication of new and revised regulatory documents result in citation of additional codes and standards, or may change information related to an existing citation. Accordingly, the SRP-MP codes and standards citations database must be periodically updated. Procedures 2.4.2 and 2.4.3 of this section describe the process used to maintain the database.

The data contained in the database have been published as NUREG/CR-5973, "Codes and Standards and Other Guidance Cited in Regulatory Documents." The data are published to make the information readily available to individuals who might find this information useful and to facilitate obtaining comments regarding the contents of the database. NUREG/CR-5973 is revised periodically to reflect changes made to the database.

#### Codes and Standards Comparisons

Changes in the status of codes and standards can impact the appropriateness of citations in the SRP or regulatory documents referenced in the SRP. In the course of maintaining the SRP-MP codes and standards citations database, changes in the status of codes and standards cited in the SRP and other regulatory documents are identified. These changes in status may result in a need to compare a code or standard, or referenced portion of a code or standard, with the latest version. These comparisons, referred to as "code comparisons," contain detailed descriptions of the differences between the cited version of a code or standard and the current version. Code comparisons also contain any recommendations regarding appropriate changes to the regulatory documents citing or endorsing the code or standard, including changes to qualifications that may be associated with the endorsement. The need to perform a comparison is identified and evaluated as a candidate for future work in accordance with Chapter 7.0. Procedure 2.4.4 of this section describes the process for performing a code comparison.

Changes in the status of cited codes and standards, pending completion of a code comparison and resolution of the code comparison recommendations, are documented in the SRP Modification Database. This is accomplished by creating a

"placeholder" integrated impact in accordance with Section 3.1.

## 2.4.2 Procedure for Codes and Standards Citation Maintenance

### Purpose and Scope of this Procedure

This procedure establishes guidance for periodically reviewing new or revised regulatory documents to identify new or revised citations of codes or standards in the SRP or other regulatory documents. This procedure is normally performed prior to the update of NUREG/CR-5973, but may be done more frequently (e.g., when the Text Retrieval System data are updated).

### Prerequisites for Performing this Procedure

1. The Text Retrieval System has been updated to include new or revised regulatory documents as described in Section 2.1.
2. An up-to-date index is available that indicates the latest published versions of standards for all the industry code groups currently identified in the SRP-MP codes and standard database.
3. The SRP-MP codes and standards citations database is available at the location where this procedure is to be performed.

### Overview of this Procedure

The Text Retrieval System (TRS) is periodically updated to incorporate any new or revised regulatory documents as described in Section 2.1. At least annually, the TRS is searched for any new code or standard citations contained in new or revised regulatory documents. New citations identified are then recorded in the SRP-MP codes and standards citations database. Independent verification is performed in accordance with Chapter 6.0.

### Procedure

1. All changes made to the SRP-MP codes and standard database data during the performance of this procedure shall be made to appropriately controlled versions of the database.

2. Using the TRS, search the latest regulatory document index using appropriate search strings to identify all documents that contain codes and standards citations.
3. Review each document in the TRS search result list and identify those documents that are not currently recorded in the SRP-MP codes and standard database.
4. Review each search "hit" in the documents identified in Step 2 to identify new citations.
5. For each new code or standard citation, create a new SRP-MP codes and standard database record.
6. Document completion of the task by creating a report of all new citation records added to the database.

## 2.4.3 Procedure for Codes and Standards Version Maintenance

### Purpose and Scope of this Procedure

This procedure establishes guidance for periodically updating the latest code and standard version data contained in the SRP-MP codes and standard database. This procedure is performed at least annually.

### Prerequisites for Performing this Procedure

1. An up-to-date index is available that indicates the latest published versions of standards for all the industry code groups currently identified in the SRP-MP codes and standard database.
2. The SRP-MP codes and standards citations database is available at the location where this procedure is to be performed.

### Overview of this Procedure

Data regarding the latest versions of cited codes and standards listed in the SRP-MP codes and standards citations database are reviewed and the database is updated using latest available information. Any changes to the latest version of a code or standard are evaluated for relevance to the SRP-MP. Recommendations are then developed to perform code comparisons, as necessary. Independent verification is performed in accordance with Chapter 6.0.

## Procedure

1. All changes made to the SRP-MP codes and standard database data during the performance of this procedure shall be made to appropriately controlled versions of the database.
2. For each unique code or standard in the database, determine the latest version and/or date of the standard and compare with information contained in the database.
3. Update each citation record in the database, as necessary.
4. For each updated code or standard citation, determine if the update affects a code or standard referenced in the SRP or a Regulatory Guide cited in the SRP. If so, perform the following:
  - a. Determine if a Research/Regulatory Action Need Form (as described in Chapter 7.0) currently exists to recommend performance of a code comparison for the cited and current versions of the code or standard.
  - b. If such a recommendation exists, update the Regulatory/Research Action Need Form and any related integrated impact(s) to indicate the latest code or standard version.
  - c. If such a recommendation does not exist:
    - (1) complete a Research/Regulatory Action Need Form to recommend performance of a code comparison for the cited and current versions of the code or standard in accordance with Chapter 7.0.
    - (2) document the code comparison recommendation in the SRP Modification Database by creating an integrated impact that references the Research/Regulatory Action Need Form in accordance with Section 3.1.

## 2.4.4 Procedure for Performing Code Comparisons

### Purpose and Scope of this Procedure

This procedure establishes guidance for performing a comparison of codes and standards cited in regulatory documents with the current version of the codes and standards.

### Prerequisites for Performing this Procedure

A need for a code comparison has been identified in accordance with Procedure 2.4.3 and the need has been documented and evaluated per Chapter 7.0.

### Overview of this Procedure

The cited version and the current version of the code and standard are compared and a code comparison document is prepared. The code comparison is published to allow an opportunity for public comment on the comparison and its recommendations. Following a public comment review period and review by cognizant NRR technical branches, the recommendations relevant to SRP are documented as potential SRP impacts in accordance with Section 2.2. The potential impacts are later evaluated and incorporated in SRP revision process described in Chapter 3. Independent verification is performed in accordance with Chapter 6.0.

### Procedure

1. Obtain copies of the cited version and the latest version of the code or standard to be compared.
2. Compare the current version of the code or standard with the referenced version and develop a code comparison document. The code comparison document should contain the following elements:
  - a. Identification of the cited code or standard.
  - b. Identification of the current code or standard.
  - c. Identification of existing regulatory citations of the code or standard.
  - d. Characterization of each regulatory citation. This includes to what extent the code or standard was

endorsed and any exceptions that are stated in the regulatory document(s).

- e. Detailed side-by-side comparison of the current and cited versions of the standard. The comparison will identify any significant differences between the two versions. A significant difference is:

a substantive change to a portion of the code or standard that the NRC has relied upon to establish a position in the regulatory document. Specifically in the case of SRP citations, a change is significant if it affects a portion of the code or standard relied upon as the basis for SRP acceptance criteria; or

the addition of substantive new information or criteria within a code or standard that has been endorsed either in whole, or in part.

- f. Discussion of differences. This section describes the rationale in making significant/not significant difference determinations.
- g. Recommendations that address each regulatory citation associated with code or standard.

3. Submit the code comparison document to PGEB for review and comment. PGEB will review the document for consistency with previously prepared code comparison documents and coordinate or perform any other reviews deemed appropriate based on the nature of the code comparison.
4. Resolve PGEB comments and revise the code comparison as necessary.
5. Submit copies of the final code comparison to cognizant NRR technical branches for comment.
6. Publish the code comparison document. The published version should include a description of the reason for performing the comparison and should solicit public comments.
7. After receiving comments from the cognizant NRR technical branches and allowing a sufficient interval for public comment, resolve the comments and revise the code comparison as necessary.
8. Publish the revised version of the code comparison.
9. Create potential impacts for each SRP recommendation contained in the final comparison in accordance with Section 2.2.

### 3 SRP Maintenance

This chapter describes the approach and procedures for maintaining the SRP for use in the review of future reactor license applications to reflect current NRC requirements and guidance.

Chapter 3 is organized as follows:

- **Section 3.1, "Integrating Impacts"** - describes the process of developing specific recommended changes to the SRP based on the evaluation of potential SRP impacts.
- **Section 3.2, "Identifying the Need for SRP Revisions"** - describes the process for determining the need to create new SRP sections or revise existing SRP sections as a result of the evaluation of SRP impacts (resulting from processes described in Chapter 2 and Section 3.1) or in response to NRC staff requests.
- **Section 3.3, "Drafting SRP Sections"** - describes the process for, evaluating integrated impacts, drafting revised or new SRP sections, and documenting the analysis work associated with draft SRP section development.

#### Participation by Primary Review Branches

Regardless of who performs work related to preparing new or revised SRP sections, the designated Primary Review Branch (PRB) for each section is ultimately responsible for the technical content of that section.

The PRB reviews the integrated impacts identified in Section 3.1. The PRB can delete, modify or add integrated impacts as necessary. Once integrated impacts are approved and the need for a new or revised SRP section is identified, three options are available to accomplish the work of developing a draft SRP section:

1. The PRB may perform the work in-house.
2. The PRB may enlist a contractor of its choosing to assist in performing the work.
3. The PRB may request that PGEB arrange for the work to be done, assisted by PGEB's contractor. If this option is used, PGEB will provide the PRB with the

initial draft of the revised SRP section and associated documentation for its review and approval.

The final draft of a revised or new SRP section will be considered a PRB product, without regard to which of the above options is chosen.

#### Documentation of Changes to the SRP Not Prepared Under the SRP-MP

Sections 2.2, 3.1, and 3.3 of this Implementing Procedures Document describe the SRP-MP process of reviewing documents for potential SRP impacts and processing these potential impacts to the point of preparing a draft SRP section and associated documentation for PRB review. As described in Section 3.2, revisions to the SRP may result from work being performed under programs other than the SRP-MP.

Changes to SRP prepared under other programs are documented in the SRP Modification Database in the same way that changes to SRP under SRP-MP are documented; however the methodology of arriving at the draft SRP and supporting documentation may be reversed (i.e., Revision Options Checklists and associated potential impacts are developed by analysis of a draft new or revised SRP section).

### 3.1 Integrating Impacts

#### 3.1.1 Approach

The purpose of this activity is to evaluate and consolidate potential SRP impacts and establish specific recommendations for changes to the SRP. This activity achieves the following objectives:

- Integrate the information contained in potential impacts by grouping related potential impacts and identifying those potential impacts that are not relevant to revising the SRP.
- Develop specific recommendation(s) with respect to revising the SRP. (Detailed analysis associated with im-

plementing the recommendation is performed in accordance with section 3.3.)

- Identify any conflicts between potential impacts that may need to be addressed.
- Characterize the amount of effort that is likely to be required to implement the recommendation.

The tasks involved are described in more detail in the following paragraphs:

Integrating the information contained in potential impacts is accomplished by reviewing the documents associated with potential impacts, grouping related potential impacts into specific topics that relate to possible SRP changes, and discarding potential impacts that are determined not to be relevant to changing the SRP.

After integrating potential impacts, a recommendation to revise the SRP is developed. The description of this recommendation is referred to as the impact summary. This description is usually two to three paragraphs in length that includes a description of the issue, how the issue relates to the SRP section, NRC action to address the issue, and a general summary of the proposed changes to the section.

There may be occasions during the grouping of related potential impacts that a conflict is identified in information presented in potential impacts. Any such conflicts are described in the impact summary discussion. These conflicts are identified, but not resolved, at this point in the process.

After developing the recommendation, the amount of effort that is likely to be required to implement the recommendation is identified.

The process for evaluating potential impacts and developing integrated impacts is described in Section 3.1. The integrated impact process is documented by completing an Integrated Impact Form. The Integrated Impact Form included in this section is a hard-copy representation of data normally entered directly in SRP Modification Database.

### **Placeholder Integrated Impacts**

In addition to providing documentation of potential impact analysis and a mechanism to present recommended changes to the SRP, integrated impacts may also be developed to

document on-going issues that have the potential for significant future impacts on the content of the SRP. These integrated impacts serve to identify issues that may be relevant in licensing reviews, but have no established generic resolution. The following are examples of such integrated impacts.

*Codes and Standards Placeholders* - As described in Section 2.4, new versions of codes and standards currently cited in regulatory documents are issued by standards organizations. Placeholder integrated impacts identify the differences in cited and current versions of those codes and standards that are determined to be relevant to SRP review criteria. These integrated impacts document recommendations and decisions made regarding code comparisons and the current status of related code comparisons. Once code comparison process has been completed as described in Section 2.4, the integrated impact is updated to reflect the final resolution.

*Draft Regulatory Guide and Proposed Rule Placeholders* - Draft Regulatory Guides and Proposed Rules may identify safety issues for which there are proposed solutions, but no currently approved generic resolution. These issues may be relevant to licensing reviews and may indicate the need to establish case-by-case resolutions for the purpose of reaching safety conclusions. Integrated impacts are developed to identify draft Regulatory Guides and Proposed Rules that are determined to be relevant to licensing reviews described in the SRP. Once the Regulatory Guide or Rule is finalized and approved, the integrated impact is updated.

*Future Work Item Placeholders* - During the course of SRP-MP activities, the need for new regulatory documents, or for revisions to existing regulatory documents (including the development of new SRP content), are identified that are not within the scope of the SRP-MP. These needs are identified and tracked as candidates for future work in accordance with Chapter 7.0. Integrated impacts are developed for those SRP sections that are likely to be affected by work identified in candidates for future work. Codes and Standards Placeholders described above are a specific form of this type of integrated impact. In addition to identifying issues that may need to be considered in licensing reviews, as previously discussed, these integrated impacts also serve to help prevent duplicate potential impact identification, analysis work, and needs identification for those issues that have already been identified and for which solutions have already been proposed.

Procedure 3.1.3 describes the process for developing placeholder integrated impacts.

### 3.1.2 Procedure for Integrating Impacts

#### Purpose of this Procedure

This procedure describes the process for evaluating potential impacts on a section-by-section basis, that have been identified for an SRP section as described in Section 2.2 and developing recommendations for changes to the SRP. The results of this procedure are used as a starting point for evaluating the need for SRP revisions (Section 3.2,) and for draft section development (Section 3.3).

#### Prerequisites for Performing this Procedure

Potential impacts have been identified for the assigned SRP section as described in Section 2.2 of this Implementing Procedures Document and the potential impacts have been entered in the SRP Modification Database.

#### Overview of this Procedure

On a section-by-section basis, potential impacts related to the assigned SRP section are retrieved and evaluated for their relevance to revising the SRP. Relevant potential impacts are organized, and combined as necessary to address specific topics associated with revising the SRP. A specific recommendation related to revising the SRP is then developed based on analysis of the potential impacts. The evaluation also characterizes the amount of effort that is likely to be required if the recommended changes are implemented in a draft SRP section. The results of the evaluation and resulting recommendation are described on an Integrated Impact Form or entered directly in the SRP Modification Database (MDB). Integrated impact forms are retained until such time that the data is entered in the MDB. Independent verification is performed in accordance with Chapter 6.0.

#### Procedure

1. Become thoroughly familiar with the contents and subject matter of the assigned SRP section.
2. Obtain, from the SRP Modification Database, the new potential impacts related to the SRP section under consideration.
3. Perform a potential impact/section consistency check by completing the Potential Impact/Section Consistency Form or by entering data directly in the MDB for each potential impact. Indicate the need to retain each potential impact for further evaluation by answering the questions indicated on the form or in the database. If it is determined during this process that a potential impact was incorrectly assigned to the SRP section, create a related potential impact for the appropriate SRP section and record the new (replacement) potential impact number in the disposition comments for the original potential impact.
4. Review the potential impacts and group them into specific topics relevant to the revision of the SRP.
5. Identify any conflicts among potential impacts in each topic group.
6. From analysis of the potential impacts in each topic group, develop a specific recommendation related to the revision of the SRP.
7. Develop an integrated impact summary description. The summary is usually two or three paragraphs in length, but may vary, and should contain the following elements:
  - Introductory statement that briefly introduces the subject of integrated impact and describes the nature of the proposed change (e.g., a change to Acceptance Criteria, Review Procedures, etc.)
  - Brief description of the regulatory concern or issue and, if not obvious, how this issue relates to the SRP section.
  - Brief description of the NRC action taken with regard to the issue and any associated requirement or guidance that resulted from the action taken.
  - Brief description of any conflicts noted in Step 5, as applicable.

Summary description of the proposed change (conclusion).
8. Characterize the amount of effort that is likely to be required to implement the recommendation presented in the integrated impact summary by designating one of

the following four categories in Part B of the Integrated Impact:

- MAJOR revision - the SRP section will largely have to be rewritten.
  - SIGNIFICANT revision - a major subsection will have to be rewritten or significant changes will have to be made throughout the SRP section
  - MODERATE revision - a number of minor revisions will be required throughout the SRP section
  - MINOR revision - small word, sentence, or parameter value changes.
9. Complete an Integrated Impact Form or enter the integrated impact data directly in the MDB.

### 3.1.3 Procedure for Preparing Placeholder Integrated Impacts

#### Purpose of this Procedure

This procedure describes the process for preparing placeholder integrated impacts as discussed in Section 3.1.1. These integrated impacts are used to document regulatory activities in progress that have significant potential for affecting the content of the SRP.

#### Prerequisites for Performing this Procedure

A regulatory development activity as documented on a Research/Regulatory Action Need Form (IPD 6.0), a draft Regulatory Guide, a Proposed Rule, or a revised code or standard, has been identified that has significant potential for affecting the content of the SRP.

#### Overview of this Procedure

Draft Regulatory Guides, Proposed Rules, revised codes and standards, and Research/Regulatory Action Need Forms input into the SRP Modification Database. Use of the forms is not required if the analyst records the data directly in the MDB. All organizations implementing this procedure must record their work either on the indicated form, an alternate

are identified in the course of other SRP-MP activities described in Chapters 2 and 3. Following identification, the issues represented by these documents are described in integrated impacts assigned to specific SRP sections. Integrated impact forms are retained until such time that the data is entered in the MDB. Independent verification is performed in accordance with Chapter 6.0.

#### Procedure

1. Develop an integrated impact summary description, usually two or three paragraphs in length, that addresses the following items:
  - An identifying statements "This integrated impact identifies a draft regulatory guide/proposed rule and will not be processed further."

Note: This statement indicates to the analyst performing integrated impact evaluations during draft section development work (as described in Section 3.3) that the integrated impact is not intended to be used as a basis for proposing changes to the SRP at this time.

  - A discussion of the regulatory issue involved, including an identification of the regulatory document(s) involved, as applicable. This discussion should also indicate why the regulatory issue identified is relevant to the SRP.
  - Identification of the applicable Research/Regulatory Action Need Form number, as applicable.
2. Complete an Integrated Impact Form or enter the integrated impact data directly in the MDB.

#### Forms

The Potential Impact/Section Consistency Form and Integrated Impact Form serve to record data that will be

form that incorporates the same information, or directly in the MDB.

**Potential Impact/Section Consistency Form**

Analyst \_\_\_\_\_

SRP Section No. \_\_\_\_\_

Potential Impact No. \_\_\_\_\_ (Attach Copy)

1. Is this potential impact already incorporated in the SRP?

Yes \_\_\_\_\_ No \_\_\_\_\_

2. Retain this potential impact as a technical rationale for acceptance criteria?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. Was this potential impact incorrectly assigned to this SRP section?

Yes \_\_\_\_\_ No \_\_\_\_\_

4. Should the potential impact be eliminated from consideration for some other reason?

Yes \_\_\_\_\_ No \_\_\_\_\_

If any of the above is answered "yes", provide further explanation: \_\_\_\_\_

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Analyst Signature \_\_\_\_\_

Date \_\_\_\_\_

Reviewer \_\_\_\_\_

Date \_\_\_\_\_

MDB Data Entry \_\_\_\_\_

Date \_\_\_\_\_

**Integrated Impact Form**

Part A - Impact Identification

SRP Section No. \_\_\_\_\_

Related Potential Impact Nos. \_\_\_\_\_

Integrated Impact ID \_\_\_\_\_

Description of Impact \_\_\_\_\_

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\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

Part B - Determination of Impact Significance

- \_\_\_\_\_ Major
- \_\_\_\_\_ Significant
- \_\_\_\_\_ Moderate
- \_\_\_\_\_ Minor

Analyst Signature \_\_\_\_\_

Date \_\_\_\_\_

Reviewer \_\_\_\_\_

Date \_\_\_\_\_

MDB Data Entry \_\_\_\_\_

Date \_\_\_\_\_

MDB Assignment Number \_\_\_\_\_ Integrated Impact Number \_\_\_\_\_

## 3.2 Identifying the Need for SRP Revisions

### 3.2.1 Approach

The SRP section is the basic unit of the SRP. Most of the work performed in revising the SRP is scheduled and accomplished on a section-by-section basis. The need to revise an existing SRP section or develop a new SRP section is identified through the following processes:

- The periodic SRP-MP review of new or revised regulatory documents as described in Section 2.3.
- NRR requests for the preparation of SRP revisions by the PGEB.
- SRP section revisions or the development of new SRP sections resulting from NRR programs other than the SRP-MP.

Regardless of how the need to revise the SRP is identified and how the drafting of these revisions is accomplished, SRP revisions must ultimately be incorporated in the SRP-MP so that revisions to the SRP are documented in the SRP Modification Database and to facilitate review, approval, and publication of revisions to NUREG-0800. When completed, SRP revisions that are developed on a section-by-section basis are consolidated into a NUREG-0800 revision package as described in Chapter 4.

The need to revise the SRP as the result of the periodic SRP-MP review of new or revised regulatory documents is evaluated at least annually by reviewing potential impacts that have been identified as described in Sections 2.2 and 2.3.

Other NRR organizations may request the assistance of the PGEB in preparing SRP revisions or new SRP content. The PGEB will determine the ability to support these requests within available SRP-MP resources. Development of new or revised SRP sections by the PGEB with the assistance of its contractor will follow the processes described in Chapters 2 and 3 regarding the identification of relevant documents, identification of potential SRP impacts, and the development of draft SRP sections and supporting documentation.

The documentation, approval, and publication of new or revised SRP sections resulting from NRR programs other than the SRP-MP may be assisted by the PGEB. The PGEB will coordinate with other NRR organizations to determine the scheduling of such support, taking into account available SRP-MP resources. The development of documentation for draft SRP sections not prepared under the SRP-MP is described in Section 3.3. The incorporation of such SRP sections in the periodic review, approval, and publication of NUREG-0800 revisions will be coordinated by the PGEB.

### 3.2.2 Procedure for Identifying the Need for SRP Revisions

#### Purpose of this Procedure

This procedure describes the process for determining the need to revise existing, or to develop new, SRP Sections. This determination is based on the evaluation, as described in Section 3.1, of potential impacts that have been identified during the review of new or revised regulatory documents as described in Section 2.3. This procedure is normally performed on an annual basis.

#### Prerequisites for Performing this Procedure

Potential impacts have been identified from the review of new and revised regulatory documents as described in Sections 2.2 and 2.3 of this Implementing Procedures Document.

#### Overview of this Procedure

Potential impacts added to the SRP Modification Database since the last revision of NUREG-0800 are evaluated as described in Section 3.1. The integrated impacts are then assessed for the need to develop new or revised SRP sections for the next revision of NUREG-0800.

#### Procedure

1. Query the SRP Modification Database to determine those SRP sections that have had potential impacts assigned since the last update of NUREG-0800.
2. For each SRP section identified in Step 1, perform impact integration in accordance with Section 3.1.

3. Evaluate the integrated impacts for each SRP section and prioritize SRP sections based on the significance of the integrated impacts. For those SRP sections that do not have substantive integrated impacts, SRP section revisions may be deferred, depending on SRP-MP resource constraints.
4. Develop a schedule for the completion of draft SRP section development to be performed in accordance with Section 3.3.

### 3.3 Drafting SRP Sections

#### 3.3.1 Approach

This section describes the process for evaluating integrated impacts, determining the SRP revisions that will be made and drafting revised or new SRP sections. Drafting SRP sections involves two distinct tasks: the analysis of integrated impacts, and the preparation of a draft SRP section.

#### Evaluating Integrated Impacts

Evaluating integrated impacts involves the following:

- Analysis of the issue identified in the integrated impact.
- Determination of the actual changes that will be made to the SRP.
- Documentation of the analysis performed to arrive at the changes.
- Documentation of the resolution of conflicts between documents identified in the potential impacts associated with the integrated impact.
- Characterization of the changes to the SRP as Type I or Type II as defined in this section.

Documentation of this integrated impact evaluation process is accomplished by completing a Revision Options Checklist. The Revision Options Checklist is an extension of the integrated impact described in Section 3.1. The Revision Options Checklist form included in this section is a hard-copy representation of data normally entered directly in SRP Modification Database. When completed, the Revision

Options Checklist represents a detailed and specific recommendation to revise the SRP. During the review and approval of a draft SRP section (described in Chapter 4), the Revision Options Checklist(s) associated with the draft SRP section is(are) revised as necessary to reflect the resolution of comments received during the review process. After a draft SRP section is approved, the data in the SRP Modification Database related to the Revision Options Checklist serves to provide a detailed historical record of changes made to the SRP.

The process for performing integrated impact analysis and completing the Revision Options Checklist is described in Procedure 3.3.2. The following discussion provides additional information regarding characterization of proposed changes as Type I or Type II changes.

Characterizing proposed revisions as Type I or Type II requires an assessment of prior NRC approvals and justification for including each suggested revision in one of the two categories. The categories are defined as follows:

#### Type I - Revisions to the SRP Without Public Comments

- Revisions to existing SRP sections or new sections that incorporate requirements or guidance that have received public comment and have been approved by the Director, NRR, and for which additional public comments are not necessary (e.g., implementation or referencing in the SRP of Commission Policy Statements or instructions, Regulatory Guides, Standards and Resolution of Generic Issues including approved Three Mile Island Action Plan items).
- Revisions that incorporate new positions in the SRP that have been approved by the Director, NRR, and by the Committee to Review Generic Requirements (CRGR) and the Executive Director of Operations (EDO) as being so clearly needed that a public comment period would cause an unacceptable delay in implementing them.
- Clarifications, corrections, changes in names or assignments of branches, deletions of unused references or other similar minor changes and editorial items that do not affect the technical content of the SRP.

#### Type II - Revisions to the SRP With Public Comments

- Revisions that incorporate proposed new or revised requirements, positions, or guidance that have not yet been

reviewed and approved by the Director, NRR, CRGR and the EDO, or that include proposed new sections for the SRP that address these new or revised requirements, positions, or guidance.

The determinations are made in terms of criteria listed in Part F of the Revision Options Checklist, and these criteria will form the basis for the Type I/Type II determination. A rationale is also developed by the analyst to assist decision makers in assessing the results provided. The rationale is a brief description of how and why the proposed revision meets the Type I or II criteria and is included in the Revision Options Checklist.

#### **Draft SRP Section Preparation**

Responsibility for revising the SRP rests with the NRR technical branch that is designated as the Primary Review Branch (PRB) for the SRP section.

PRB concurrence with proposed changes to the SRP is facilitated by providing a draft SRP section and Revision Options Checklist(s) as supporting documentation. The information identified, processed, evaluated, and organized by previous steps and procedures assists the PRB in determining the need for, and concurrence with, proposed SRP changes. This documentation will be provided to the PRBs and will be used by the PRBs, along with the knowledge and experience contained within the PRB staff, to determine which changes will be made.

Decisions and comments of the PRBs will need to be recorded in the SRP Modification Database. To this end, the PRBs are asked to record their decisions and comments in writing. This information is returned to the PGEB, which will have it entered in the SRP Modification Database.

Appendix A to this Implementing Procedures Document describes the standard format for SRP sections and various guidelines associated with developing new or revised draft SRP sections. Procedure 3.3.3 describes the process for developing draft SRP sections, and supporting documentation, for PRB review.

### **3.3.2 Procedure for Evaluating Integrated Impacts**

#### **Purpose and Scope of this Procedure**

This procedure describes the process for performing the analysis necessary to develop specific and detailed SRP changes in order to implement the SRP change recommendation made in integrated impacts developed under Section 3.1. This procedure also provides guidance for completing the Revision Options Checklist that is used to document this analysis.

#### **Prerequisites for Performing this Procedure**

1. Integrated impacts have been developed for the assigned SRP section in accordance with Section 3.1.
2. The PRB designated as having responsibility for the assigned SRP section has reviewed the integrated impacts and provided comments, as applicable.

#### **Overview of this Procedure**

Analysis is performed to determine the actual changes that will be made to the SRP to implement the recommendation(s) presented in the integrated impact(s) associated with the assigned SRP section. Any conflicts identified in integrated impact are resolved. The analyst then documents the detailed, proposed changes for the assigned SRP section and the rationale associated with those changes. Finally, the analyst characterizes the proposed changes as Type I or Type II. Revision Options Checklist forms are retained until the data are entered in the MDB. Independent verification is performed in accordance with Chapter 6.0.

#### **Procedure**

1. Obtain the integrated impacts for the section (produced under Section 3.1).
2. Resolve any PRB comments received on the Integrated Impact(s). Document these review comments and action taken to resolve the comment in Part A of the Revision Options Checklist(s).
3. Perform analysis as necessary to determine the specific changes to SRP that are necessary to implement the recommendation of each integrated impact.

4. Complete Part C of the Revision Options Checklist Form. To the extent practical, Part C should reflect changes as they are intended to appear in the actual SRP section.
5. Complete Part D of the Revision Options Checklist Form. Part D is used to document the rationale associated with how the issue described in the integrated impact was addressed in the SRP changes proposed in Part C.
6. Resolve any conflict identified in the integrated impact. Most conflicts arise from outdated information and can be resolved through careful analysis of the regulatory documents associated with the issue. It may be necessary to coordinate with the responsible PRB in order to arrive at a satisfactory resolution. Document resolution of any conflicts by completing Part E of the Revision Options Checklist Form.
7. Recommend whether the changes to the SRP should be considered Type I or Type II by completing Part F of the Revision Options Checklist.

### 3.3.3 Procedure for Drafting SRP Sections

#### Purpose of this Procedure

The purpose of this procedure is to describe the process for developing a draft SRP section that incorporates the changes to the SRP detailed in Revision Options Checklists associated with the assigned SRP section. The procedure also describes the process for assembling a draft SRP section documentation package that will be used in the SRP review and approval process described in Chapter 4.

#### Prerequisites for Performing this Procedure

Integrated impacts have been evaluated and Revision Options Checklists developed for the assigned SRP section in accordance with Procedure 3.3.2.

#### Overview of this Procedure

For SRP section revisions, a redline/strikeout copy of the SRP section is prepared that documents text additions, deletions, and modifications proposed in Revision Options Checklists. For new SRP sections, a draft SRP section is developed that implements the review topics and issues

described in the associated Revision Options Checklist(s). Two attachments to the draft SRP section are developed to provide a detailed identification of the sources of the proposed changes to the SRP section. Independent verification is performed in accordance with Chapter 6.0.

#### Procedure

1. Using the Revision Options Checklist(s) developed for the SRP section, draft the new or revised SRP section. During preparation of the draft, observe the following:
  - a. Appendix A to this Implementing Procedures Document describes the standard format for SRP sections and various guidelines associated with developing new or revised draft SRP sections.
  - b. If the SRP section is a revision of an existing section, start with a copy of the currently approved SRP section and indicate each text addition, deletion, or modification using redline/strikeout text markers. Text markers should be provided for editorial changes as well as changes specifically related to a Revision Options Checklist.
2. Prepare an attachment to the draft SRP section labeled "Proposed Changes in Order of Occurrence," as follows:
  - a. For revised SRP sections, each change identified in Step 1.b should be provided with a superscripted number corresponding to a line item in the attachment. For new SRP sections, each significant topic of the new SRP section should be provided with a superscripted number corresponding to a line item in the attachment.
  - b. Include in the following for each attachment line item: (1) A line item number; (2) Description of the source of the change (e.g., "Editorial" or Revision Options Checklist number); and (3) Brief description of the change.
3. Prepare a second attachment to the draft SRP section labeled "Summary of ROCs." Include a line item in the attachment that identifies each Revision Options Checklist used to develop the draft SRP section and the subsections of the draft SRP section that were affected by the Revision Options Checklist.

**Forms**

The Revision Options Checklist form (Parts A through F) structures the analyst's review of integrated impacts and the resulting potential changes to the SRP. It provides the PRB with the information needed to decide if and how the SRP will be modified.

All organizations implementing this procedure must record their work on the indicated form and forward the completed forms to the PGEB upon completion of the work, or enter the information directly in the SRP Modification Database.

**Revision Options Checklist**

Part A - Impact Identification

SRP Section No. \_\_\_\_\_

Related Potential Impact Nos. \_\_\_\_\_

\_\_\_\_\_

Integrated Impact No. \_\_\_\_\_

Description of Impact \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Part B - Determination of Impact Significance

\_\_\_\_\_ **Major**  
\_\_\_\_\_ **Significant**  
\_\_\_\_\_ **Moderate**  
\_\_\_\_\_ **Minor**

Part C - Characterization of Type and Nature of Change

\_\_\_\_\_

\_\_\_\_\_

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**Revision Options Checklist (Continued)**

Part D - Discussion of Possible Changes

Statement of Option \_\_\_\_\_

Pros \_\_\_\_\_

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**Revision Options Checklist (Continued)**

Part E - Identification of Conflicts

Conflict Identified? Yes \_\_\_\_ No \_\_\_\_

Conflicting Potential Impact Nos. \_\_\_\_\_

Description of Conflict \_\_\_\_\_

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Potential Resolution \_\_\_\_\_

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Rationale \_\_\_\_\_

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Is potential research indicated? Yes \_\_\_\_ No \_\_\_\_

Is potential rulemaking, regulatory guide  
revision, or other regulatory action indicated? Yes \_\_\_\_ No \_\_\_\_

Is potential codes/standards development indicated? Yes \_\_\_\_ No \_\_\_\_

Are there additional conflicts? Yes \_\_\_\_ No \_\_\_\_

("Yes" to "additional conflicts" will require completion of another Part E)

**Revision Options Checklist (Continued)**

## Part F - Type I/Type II Determination

Type I - Revisions to the SRP Without Public Comment

1. Do the suggested revisions incorporate new or revised requirements or guidance that have received, or will receive, public comment and have been approved by the Director, NRR, and therefore do not require additional public comments?  
  
Yes \_\_\_\_\_ No \_\_\_\_\_
2. Do the suggested revisions incorporate new positions that have been approved by the Director, NRR, and by CRGR and EDO as being so clearly needed that a public comment period would cause an unacceptable delay in implementing them?  
  
Yes \_\_\_\_\_ No \_\_\_\_\_
3. Do the suggested revisions involve only minor changes, such as clarifications, corrections, changes in names or assignments of branches, or deletions of unused references?  
  
Yes \_\_\_\_\_ No \_\_\_\_\_

Type II - Revisions to the SRP with Public Comments

1. Do the suggested revisions incorporate proposed new or revised requirements, positions, or guidance that have not been reviewed and approved by the Director, NRR, CRGR and the EDO, or which could result in new sections for the SRP?  
  
Yes \_\_\_\_\_ No \_\_\_\_\_

Provide Rationale for Above Determination \_\_\_\_\_

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**Revision Options Checklist (Continued)**

**Analyst Signature** \_\_\_\_\_

**Date** \_\_\_\_\_

**Reviewer** \_\_\_\_\_

**Date** \_\_\_\_\_

**MDB Data Entry** \_\_\_\_\_

**Date** \_\_\_\_\_

## 4 Review and Approval of SRP Revisions

This chapter contains the procedures to be followed in reviewing and approving revisions of the SRP developed as described in Chapter 3.

Chapter 4 is organized as follows:

- **Section 4.1, "PRB Review of Draft SRP Sections,"** draft SRP sections are reviewed by the PRB.
- **Section 4.2, "Consistency Review,"** PRB-approved SRP sections are reviewed for consistency with established format and procedural requirements.
- **Section 4.3, "SRP Revision Package Integration,"** PRB-approved SRP sections are integrated into a SRP Revision Package.
- **Section 4.4, "NRC Review and Approval,"** NRC review necessary for the issuance of SRP revisions is accomplished.

### 4.1 PRB Review of Draft SRP Sections

#### 4.1.1 Approach

Draft SRP sections are considered a PRB product, regardless of who developed the draft. Therefore, the PRB must approve all drafts before they are submitted for inclusion in the SRP.

It should be noted that the intent of this section is to provide for PRB review of draft SRP sections; other procedures that require such a review may be used in lieu of this procedure. The guidance provided in this procedure is general in nature, recognizing that the PRBs have developed their own methods based on the specific requirements associated with their review areas.

It should be also noted that, in order to implement the Commission's Interim Policy Statement on Improving Technical Specifications issued in February 1987, the PRBs should consult the Technical Specifications Branch when the Acceptance Criteria or review procedures of an SRP section could affect the plant's technical specifications.

#### 4.1.2 Procedure for PRB Review of Draft SRP Sections

##### Purpose of this Procedure

This procedure recommends a review process by which NRR branches review SRP draft sections for which they are responsible, and provides general guidance for that review. This procedure applies to new or revised SRP sections resulting from the SRP-MP, and it applies to a PRB only for those sections for which it has primary responsibility. (The application of this section is a PRB decision; the only program requirement is that the PRB must approve all draft SRP sections for inclusion in the SRP.)

##### Prerequisites for Performing this Procedure

An SRP section draft and supporting documentation have been prepared as described in Section 3.3.

##### Overview of this Procedure

The PRB reviews the draft for consistency. After comments are appropriately resolved and the draft revised accordingly, the draft is reviewed and approved by PRB management. Although there may be discussion between PRB staff and contractors in preparation of revised drafts, PRB staff will make all decisions which are implemented by contractor personnel. In the case of NRC staff-prepared drafts, comments are resolved between reviewers and preparers and the results are incorporated in the draft. Finally, the completed draft is forwarded to the PGEB with a memorandum documenting the PRB's approval.

##### Results of this Procedure

The written product resulting from the implementation of this procedure is a PRB-approved draft of a revised or new SRP section. Any intermediate review drafts, comments, or comment resolutions resulting from the review are the responsibility of the PRB and are not maintained as part of the SRP-MP.

### Procedure

Any or all of the following steps may be superseded by existing procedures that accomplish the same goals.

1. PGEB coordinates with the responsible PRB and establishes resource availability and a scheduled completion date in support of the SRP section draft review.
2. PRB informs PGEB of any changes to the review schedule as soon as schedule impacts become apparent.
3. PRB reviews drafts, as follows:
  - a. Assign the PRB staff member(s) responsible for reviewing the draft and resolving comments. The assigned reviewer should not have had significant involvement with the preparation of the portion of the document being reviewed.
  - b. Review the draft to ensure that PRB objectives are met. Verify that the draft provides adequate review guidance, is technically correct, and is consistent with NRC and NRR policy and procedures.
  - c. Document the reviewer comments and, if required, transmit comments to the section preparer.
  - d. Revise the draft and associated Revision Options Checklists, as necessary, to incorporate comment resolutions. Revisions may be made by the PRB staff, or the PRB staff may direct the contractor to do so.
  - e. PRB reviews the revised draft to ensure proper implementation of review results.
  - f. Iterate Steps d and e until the draft is in a satisfactory form.
  - g. Provide the draft section to the PRB Branch Chief or designated individual for approval review.
  - h. Obtain the PRB Branch Chief's or designated individual's signature and date on a memorandum indicating PRB approval of the SRP section.
4. Assemble any forms that were completed by the PRB in evaluating impacts and drafting of the section revision.

5. Forward the draft section to the PGEB, along with the signed approval memorandum.

## 4.2 Consistency Review

### 4.2.1 Approach

Section 4.1 describes the process for a technical and policy review of each SRP section by the PRB. Section 4.2 provides for a review of each section for consistency with format and procedural requirements established by this document and for consistency with other SRP sections. The consistency review makes four determinations: (1) whether the revised SRP section meets the requirements set forth in this document (primarily the ones included in Section 3.3 and Appendix A to this document); (2) whether technical issues also treated in other SRP sections are treated in a consistent manner; (3) whether the revised SRP section is consistent with established format; and (4) whether the revised SRP section meets basic editorial requirements.

Appendix A sets forth the established SRP section format and guidelines for subsection content. Section 3.3 sets forth the basic requirements for the drafting of new or revised SRP sections. These guidelines include such items as the development of Acceptance Criteria technical rationale, presentation of parameter values in metric and English units, and incorporation of new positions approved by the PRB. Most of the guidance and procedures preceding Section 3.3 involve supporting information and will not directly contribute to this consistency review. Therefore, the first check performed by this procedure is to determine whether the substantive requirements set forth in this Implementing Procedures Document are addressed in each SRP section draft.

The second check determines whether technical issue(s) in the SRP section draft are treated in a manner consistent with treatment of the same issue(s) in other SRP sections. This check ensures that treatment of technical issues in one section is not in conflict with or unnecessarily redundant to the coverage of the same issues in other sections.

The third check performed in this procedure is to determine whether each SRP section draft is prepared in accordance with the established SRP format. The format is established by Section 3.3 and Appendix A to this IPD. Within that

format, it is also necessary to ensure consistency of writing style and appropriate level of detail.

The final check to be performed will be an editorial review. This will include correction of misspellings, punctuation, and grammar.

In cases where the draft is found not to meet the requirements established in this document, it will be returned to the PRB for rework.

### 4.2.2 Procedure for Performing Consistency Review

#### Purpose of this Procedure

This procedure provides direction for the consistency review of each new or revised SRP Section. This procedure will be applied to SRP section drafts, as directed by the PGEB.

#### Prerequisites for Performing this Procedure

Procedure 4.1.2 should be completed for any SRP sections to be subjected to the consistency review directed by this procedure.

#### Overview of this Procedure

This procedure specifies a three-step review process. First, a review of draft SRP section revisions against procedural requirements included in this document is performed. Second, a review of technical issues common to other SRP sections is done. The PRB is informed of any substantive deviations from the requirements or conflicts with other sections, and the section draft is revised. This process is iterated until the draft is satisfactory. Third, a format and editorial review is conducted, and the draft is corrected accordingly. The draft revision will, at this point, be ready for integration into a revision package (Section 4.3) and the formal NRC review and approval process as discussed in Section 4.4.

#### Results of this Procedure

Implementation of this procedure will result in draft SRP sections that are ready for integration into the next SRP revision package for NRC review and approval process (Sections 4.3 and 4.4). Such drafts will meet procedural re-

quirements, be consistent with other SRP sections and with the established format, and be editorially correct. Depending on the number of iterations that are required, intermediate drafts and associated comments may also result.

#### Procedure

##### Perform the consistency review.

1. Review the draft SRP section to ensure conformance with the procedural requirements set forth in this document (primarily Section 3.3).
2. Review the draft SRP section to ensure consistent treatment of technical issues also treated in other SRP sections.
3. Review the draft SRP revision to ensure conformance with format and editorial needs.
4. If no problems are identified during the review, proceed to Step 10; otherwise, proceed to the next step.

##### Resolve any Review Comments.

5. Resolve non-substantive comments with the PRB staff. Make any necessary modifications to the section draft, documenting the nature and resolution of any non-substantive comments addressed by the redraft. Proceed to Step 10 if there are no substantive comments.
6. Provide any substantive comments to the PRB and request technical direction to resolve the comments. The request should contain the substantive comments and proposed resolution. A suggested redraft may be included with this request.
7. The PRB will redraft the SRP section to resolve the comments or will provide direction for further changes to address the comments.
8. The PGEB will review any PRB redrafts in light of the previous comments or will incorporate PRB technical direction in the drafts. If the redraft or technical direction is inadequate to resolve problems, document the reason and repeat Steps 6 and 7 until the draft is adequate. Then proceed to the next step.

##### Submit the revised draft for PRB approval.

9. If substantive changes are made, submit the revised draft to the PRB for approval. Provide the PRB a marked-up copy with documentation of changes made and revised copy to facilitate its review.

Circulate draft SRP sections among the PRBs for information (PGEB responsibility).

10. Provide a copy of each completed draft SRP section to those PRBs not involved in preparation of the draft. Circulation of drafts is for information and coordination between the PRBs.

#### Forms

No forms are used to implement this procedure. Comments and approvals will be documented in correspondence between the contractor and the NRC and in internal memoranda within NRR.

### 4.3 SRP Revision Package Integration

#### 4.3.1 Approach

A "revision package" is a group of SRP sections, or a single SRP section, that will be issued as a formal revision to NUREG-0800. The revision package consists of the revised SRP section(s), as a redline/strikeout, and supporting justification for the changes (attachment tables with change descriptions, integrated impacts and potential impacts related to the revisions in the package). As the revised SRP sections are reviewed and approved by the PRBs, they will be combined into SRP revision packages. Integration of SRP sections into a revision package may be based upon a periodic (e.g., annual) update of the SRP or upon a commitment to incorporate new staff positions in the SRP.

PRB-approved, revised or new SRP sections will already be in correct format as a result of implementation of previous procedures. Individual sections will be assembled into a set of electronic files. The SRP table of contents will be updated. Finally, as the SRP revision package nears completion, a review of the overall document will be performed to identify any areas where improvement is needed (e.g., missing review areas, inconsistent approaches, etc.).

#### 4.3.2 Procedure for Integration of the SRP Revision Package

##### Purpose of this Procedure

This procedure provides direction for incorporating all new or revised SRP sections into an integrated revision package on a periodic or one-time basis. This procedure will operate on only those SRP sections that have been reviewed and approved under Section 4.2 and any other SRPs that have been approved at the time of implementation of this procedure.

##### Prerequisites for Performing this Procedure

Procedure 4.2.2 should be completed for any new or revised sections that are to be incorporated in the integrated SRP revision package. Sections from other, previously approved, SRPs may also be incorporated.

##### Overview of this Procedure

New and revised SRP sections are assembled into a collection of electronic files as a revision package and appropriately maintained. An overall review of the completed SRP revision package is then performed.

##### Results of this Procedure

The written product resulting from this procedure will be an integrated SRP revision package in electronic files and in print-ready hard copy.

##### Procedure

Build and maintain a grouping of electronic files for the SRP revision package.

1. Copy the electronic file for each SRP section into the master grouping for the SRP revision.
2. Update the SRP table of contents and perform any other needed maintenance of the SRP files as sections are added.
3. Track the completion of the integrated SRP and periodically report progress.

4. Establish the criteria to be used in performance of the overall review of integrated SRP.
5. Review the completed SRP revision package according to the established review criteria. Identify any areas where corrections or further work is required, and identify candidates for future work as described in Chapter 7.0 as appropriate to the areas identified.

## 4.4 NRC Review and Approval

### 4.4.1 Approach

This section addresses the various reviews and approvals that are required in order to issue SRP sections. Included are NRC management, the Committee to Review Generic Requirements (CRGR), the Advisory Committee on Reactor Safeguards (ACRS) and provision for any required public comments and comment resolution. It is the intent of the SRP-MP that for review purposes, revised or new SRP sections will be grouped into "revision packages." In most cases, review should be facilitated by the fact that the revisions to the SRP are made specifically to reflect established staff positions and regulatory requirements.

In general, the PGEB will be responsible for overall management and oversight of the review and approval process (including tracking progress) and reporting progress to NRR management. For revision packages constituting the work product of a single PRB, the PRB will be responsible for preparing review packages for the CRGR, the ACRS, and public comment; making CRGR presentations; resolving public comments; coordinating revision of section drafts; and coordinating with interfacing NRR divisions and branches. The SRBs will provide technical support to the PRBs as requested by the PRBs, but at a minimum will have an opportunity to review and comment on all drafts. For major updates or revisions involving multiple PRB responsibilities, the PGEB will coordinate: preparation of review packages for the CRGR, the ACRS, and public comment; CRGR presentations; resolution of public comments; revision of section drafts; and interfaces with interfacing NRR divisions and branches.

The extent of NRC review and approval is dependent on the nature of the SRP revision. Type I revisions require less review since the changes do not go beyond the scope of

approved requirements. Type II revisions require more extensive review.

### 4.4.2 Procedure for Obtaining NRC Review and Approval - Type I Revisions

#### Purpose of this Procedure

This procedure provides direction as to how proposed Type I revisions to the SRP are to be reviewed and approved. The scope of this procedure includes only those proposed SRP revisions that are considered Type I changes.

#### Prerequisites for Performing this Procedure

Procedure 4.3.2 will be completed prior to performance of this procedure.

#### Overview of the Steps in this Procedure

The CRGR and the ACRS are advised of the intent to issue the SRP revision, including the basis for designating the revision as Type I. The issuance of the SRP revision package is then noticed in the *Federal Register*.

#### Results of this Procedure

*Written Product* - Written products resulting from the implementation of this procedure will include various review packages, *Federal Register* notices, and approved versions of SRP section revisions.

#### Procedure

It is intended that this procedure will be implemented on a "revision package" basis.

1. Review the revision package for completeness and format and verify that the proposed change meets the criteria for a Type I revision, ensure that the revision does not go beyond the scope of approved requirements, or that clarifications do not go beyond the intent of existing regulations. (PGEB or PRB responsibility, depending on scope of revision package.)
2. Forward the draft revision package to appropriate NRR divisions, other technical offices, and the Office of General Counsel for information. Resolve any comments to the extent possible. (PGEB or PRB

responsibility, depending on scope of revision package.)

3. Prepare a draft SRP revision package including memoranda to the ACRS and the CRGR for the signature of the Director, NRR, that summarizes and explains the need for the revision and provides the basis for designating the revision as a Type I change. This memo should request expedited review and concurrence with the designation of the SRP revision as Type I. (PGEB or PRB responsibility, depending on scope of revision package.)
4. Transmit the package for information, with the memoranda signed by the Director, NRR, to the ACRS and the CRGR. (PGEB will coordinate this activity.)
5. Prepare a *Federal Register* notice of SRP revision and forward the notice to the Division of Freedom of Information and Publications Services under the signature of the Branch Chief, PGEB. (PGEB responsibility.)

#### Forms

No forms are specified for this procedure.

### 4.4.3 Procedure for Obtaining NRC Review and Approval - Type II Revisions

#### Purpose of this Procedure

This procedure provides direction as to how proposed Type II revisions to the SRP are to be reviewed and approved. The scope of this procedure includes only those proposed SRP revisions that are considered Type II changes.

#### Prerequisites for Performing this Procedure

Procedure 4.3.2 will be completed prior to performance of this procedure.

#### Overview of the Steps in this Procedure

SRP Section drafts are reviewed by appropriate NRR divisions, the Office of General Counsel, the CRGR, and the ACRS, and all comments are addressed. The revision is then noticed in the *Federal Register* for public comments, public comments are resolved, and the revised SRP section is subjected to the same NRC reviews and approvals noted above.

#### Results of this Procedure

*Written Product* - Written products resulting from the implementation of this procedure will include various review packages, status reports, *Federal Register* notices, and approved versions of SRP section revisions along with comment resolution and approval histories.

*Other* - Other results include presentations to the CRGR and others, as requested.

#### Procedure

It is intended that this procedure will be implemented on a "revision package" basis.

#### Obtain internal NRC reviews/approvals for revised or new SRP sections.

1. Record the accomplishment of each milestone in the SRP Revision Package Review and Approval Status record. (PGEB responsibility)
2. Prepare an SRP revision package including a draft memorandum to the CRGR for the signature of the Director, NRR, that summarizes and explains the need for the revision and includes a regulatory analysis or backfit analysis prepared in accordance with NRR procedures. (PGEB or PRB responsibility, depending on scope of revision package.)
3. Forward the revision package to appropriate NRR divisions, other technical offices, and the Office of General Counsel for review. Resolve comments to the extent possible and obtain the appropriate concurrences. (PGEB or PRB responsibility, depending on scope of revision package.)
4. Document the comments, their resolution, and any divergent views that could not be resolved. (PGEB or PRB responsibility, depending on scope of revision package.) If a single PRB is responsible for the package, forward the revision package and comment documentation to the PGEB.
5. Forward the revision package to the Director, NRR, at least four weeks prior to the scheduled submission to the CRGR. (PGEB will coordinate this activity.)

6. Support any dry run CRGR presentations requested by the Director, NRR, and revise the revision package and transmittal memorandum in accordance with any comments and instructions from the Director, NRR. (PGEB or PRB responsibility, depending on scope of revision package.)
7. Once the Director, NRR, has approved the revision package, schedule a meeting with the CRGR. Transmit the package, with the memorandum signed by the Director, NRR, to the CRGR. (PGEB will coordinate this activity)
8. Make necessary presentations to the CRGR and resolve any CRGR comments. Prepare a response to CRGR comments for transmittal by the Director, NRR, within one week of receiving the comments. (GEB or PRB responsibility, depending on scope of revision package)
9. Prepare a memorandum to the ACRS, from the Director, NRR, transmitting the revision package. The memorandum should summarize the revision, explain the need for the revision, and include the regulatory analysis. The PRB should forward the draft memorandum to the PGEB. (PGEB or PRB responsibility, depending on scope of revision package.)
10. Review the draft memorandum, resolve any comments with the PRB, obtain the signature of the Director, NRR, and forward the memorandum and revision package to the ACRS. (PGEB will coordinate.)
11. Support any presentations to the ACRS, resolve any ACRS comments, modify the revision package, and forward the package to the PGEB. (PGEB or PRB responsibility, depending on scope of revision package.)

Obtain and resolve public comment.

12. Assemble the revision package, prepare a *Federal Register* Notice of Intent to revise the SRP, and forward the *Federal Register* notice to the Rules Review and Directives Branch, Division of Freedom of Information and Publications Services under the signature of the Branch Chief, PGEB. (PGEB responsibility.)
13. Ensure that public comments received are entered into the SRP Modification Database, and forward com-

ments to PRBs for resolution. Public comments will be recorded as Potential Impacts as described in Section 2.2. (PGEB responsibility)

14. Resolve each substantive comment, making the necessary modifications to the draft SRP section. Maintain a record of comment resolutions and accompanying SRP changes. Prepare a final revision package. Forward the final revision package, along with comment resolution records, to the PGEB. (PGEB or PRB responsibility, depending on scope of revision package.)
15. Enter comment resolution into the SRP Modification Database. Resolution of public comments will be recorded as Potential Impact consistency check comments and/or Integrated Impacts in a manner similar to impacts from other regulatory documents (see Section 3.3). Enter the final section revision into the electronic SRP. (PGEB responsibility.)

Obtain final internal NRC reviews/approvals.

16. Repeat Steps 3 through 11 for the final revision package. Responsibilities remain as indicated in those steps.
17. Update the SRP Modification Database and electronic SRP files with appropriate information resulting from implementation of Step 16. (PGEB responsibility.)
18. Prepare a *Federal Register* notice of SRP revision and forward the notice to the Division of Freedom of Information and Publications Services under the signature of the Branch Chief, PGEB. (PGEB responsibility.)

**Forms**

No forms are specified for this procedure; however, a SRP Revision Package Review and Approval Status Record will be created for each revision package processed under this procedure. The purpose of the SRP Revision Package Review and Approval Status Record is to allow tracking of formal review and approval for each SRP revision. The SRP Revision Package Review and Approval Status Record should document the information listed in Table 4.1.

Table 4.1 Recommended Content

Type II SRP Revision Package Review and Approval Status Record		
Revision package description (including SRP section numbers): _____		
_____		
Milestone	By whom	Date completed
<u>CRGR Review</u>		
Final draft of SRP section revision provided to PRB	_____	_____
PRB/PGEB cover memo to CRGR drafted, revision package completed, package sent to PGEB	_____	_____
Revision package forwarded to Director, NRR	_____	_____
CRGR meeting held	_____	_____
CRGR comments resolved	_____	_____
<u>ACRS Review</u>		
Draft ACRS memorandum forwarded to PGEB	_____	_____
ACRS memorandum transmitted	_____	_____
ACRS comments resolved	_____	_____
<u>Public Comment</u>		
<i>Federal Register</i> notice sent to Division of Freedom of Information and Publications Services	_____	_____
<i>Federal Register</i> notice published		_____
FR ref: _____		
Public comment response due date: _____		
Public Comments resolved	_____	_____
<u>Second CRGR Review</u>		
PRB cover memo to CRGR drafted, revision package completed, package sent to PGEB	_____	_____

Table 4.1 (continued)

Milestone	By whom	Date completed
Revision package forwarded to Director, NRR		_____
CRGR meeting held		_____
CRGR comments resolved	_____	_____
<u>Second ACRS Review</u>		
Draft ACRS memorandum forwarded to PGEB	_____	_____
ACRS memorandum transmitted		_____
ACRS comments resolved	_____	_____
<u>Public Comment</u>		
<u>Federal Register</u> notice sent to Division of Freedom of Information and Publications Services	_____	_____
<u>Federal Register</u> notice published: FR Ref: _____	_____	_____

## 5 Reserved

## 6 Independent Review of Work

This chapter outlines measures to be taken to ensure the accomplishment of high quality work by contractors performing tasks in support of the SRP-MP. The specific implementation of these measures will be determined by the PGEB as work tasks are assigned to contractors, taking into account the nature and complexity of the work to be performed.

### 6.1 Discussion

Reviews of work will be performed by a reviewer independent of the initial performance of the work. The independence criterion is taken to mean that the reviewer may not have been directly involved in the actual accomplishment of the work. An analyst may not review his or her own work; two persons working together on the same item may not review each other's work.

In general, independent reviewers should meet at least the same qualifications as the individual originally performing the work, and, if possible, should have more experience than the original work performer (analyst).

The method of review used is dependent on the nature of the work. In general, the reviewer is assumed to be sufficiently qualified and experienced to be able to determine the most appropriate review method. The result of an independent review is typically the generation of a set of comments. The preparing analyst and the reviewer will resolve any comments regarding the work or how it was performed.

Contractor management personnel shall periodically review the results of independent reviews and critically review the results to identify any trends or programmatic concerns that could compromise the quality of program work and products. Any problems identified shall be investigated for the root causes and appropriate corrective actions taken. Following the accomplishment of corrective actions, the areas of concern shall be re-examined to verify the efficacy of the corrective actions.

Documentation related to the performance of the activities described in this chapter shall be maintained by the contractor.

## 7 Identification of Candidates for Future Work

This chapter describes the procedures to ensure that needs for research, regulatory action, or codes and standards development are brought to the attention of cognizant NRC organizations.

### 7.1 Discussion

The SRP-MP recognizes that in the course of performing SRP-MP activities, the need for actions outside the scope of the SRP-MP itself may be identified. Some examples of such situations are:

- where regulatory requirements or positions are insufficient to establish a basis or sufficient guidance for SRP reviews,
- where the current NRC endorsement of codes and standards need to be reconsidered due to changes in the status of endorsed codes and standards,
- where it is determined that an existing regulatory document, other than the SRP, is found to need revision to update existing information.

Once needs for research or regulatory action are identified, this procedure will ensure that cognizant organizations within the NRC are made aware of such needs, and will provide a mechanism to track the NRC's response so that, once resolved, they may be factored into the SRP-MP maintenance process.

The SRP-MP may identify circumstances where substantial changes are required to the SRP that cannot be accommodated within the routine scope of SRP-MP activities or where regulatory development has already been identified and is in progress, but not completed. This procedure will be used to document and track planned SRP new content development activities that may not be accommodated in the current SRP revision cycle.

### 7.2 Procedure for Identification of Candidates for Future Work

#### Purpose of this Procedure

This procedure ensures that needs for research or regulatory action, identified in the implementation of other procedures described in this Implementing Procedures Document, are brought to the attention of cognizant NRC organizations for resolution. This procedure also provides a mechanism to track these issues that may affect the content of the SRP.

#### Procedure

1. Prepare a Research/Regulatory Action Need Form for each need identified. Completion of this form is the responsibility of the analyst who identifies the need. The form attached to this section may be completed or the data may be entered directly in the SRP Modification Database.
2. Create an integrated impact describing the issue identified in the Research/Regulatory Need Form for the appropriate SRP section(s) as described in Section 3.1 (Procedure 3.1.3).
3. Transmit the Research/Regulatory Need Form to the PRB for approvals, as necessary (PGEB responsibility).
4. The PRB approves or disapproves the Research/Regulatory Need Form and returns it to the PGEB.
5. Enter the Research/Regulatory Need Form data in the SRP Modification database, if not already done.
6. The PGEB forwards approved Research/Regulatory Need Form to the cognizant organizations within the NRC for further action, if applicable.
7. Track the progress of identified and approved needs. Update the Research/Regulatory Need Form and associated integrated impact data in the SRP Modification Database, as necessary.

## Identification

8. Create Research/Regulatory Need status reports at the frequency determined by the PGEB.
9. When activities are completed, close the Research/Regulatory Need Form and associated integrated impact data in the SRP Modification Database.

## Forms

The Research/Regulatory Action Need Form is used to identify potential needs, to obtain PRB and PGEB approvals, and to transmit this information to responsible organizations. The form is also used to record the current status and final disposition of the need.

# Research/Regulatory Need Form

Need Number \_\_\_\_\_

Need Title \_\_\_\_\_

Need Source \_\_\_\_\_

SRP Section(s) \_\_\_\_\_

Need Type:

☐ Research

☐ Rulemaking

☐ Regulatory Guide Development/Revision

☐ Codes/Standards Development

☐ Other

Description of Need \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

References \_\_\_\_\_

Analyst's Name (print) \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

Analyst's Supervisor's Approval \_\_\_\_\_

Date \_\_\_\_\_

PGEB Approval \_\_\_\_\_

Date \_\_\_\_\_

### Identification

## Research/Regulatory Need Form (Continued)

Status Remarks \_\_\_\_\_

\_\_\_\_ Need Resolved

Signature \_\_\_\_\_

Date \_\_\_\_\_

### **How to Complete the Form**

*Need Number* - This number has the form: 'SRP Section Number - Sequential form number'. The sequential form number must be obtained from the SRP Modification Database by determining the last form entered for the specified SRP section.

*Need Title* - The title is created by the analyst and should convey the essence of the need.

*Need Source* - The source is the IPD procedure being performed when the need is identified.

*SRP Section(s)* - The SRP section or sections associated with the need.

*Need Type* - Select the option that describes the type of need or check 'Other'.

*Description of Need* - Enter a brief description of the need and indicate any applicable reference documents. The description should include how the need and SRP are related.

*Status Remarks* - When new information regarding the status of the need is identified, create an entry, that starts with the date of the entry, reflecting the status information.

*Need Resolved* - This line is marked when no further action related to the need is expected to occur that is significant to the SRP-MP.

## **Appendix A**

### **Standard Review Plan Format**

## **Appendix A**

### **Standard Review Plan Format**

This Appendix describes the standard format for SRP sections and provides guidelines associated with developing new or revised draft SRP sections. In general, the prescribed format retains the essential features of the original issue of NUREG-0800 since the NRR staff and licensees are familiar with that format, and most existing safety analysis reports are written in this format. This Appendix also includes guidance for: implementation of the NRC's Metrication Policy; formatting of SRP reference citations and References listings; and implementation of the resolution of Generic Issue B-3.

#### **A.1 Numbering of SRP Sections**

The existing numbering structure of the SRP will be preserved. It is preferable to fit new concepts into existing SRP sections whenever it is reasonable to do so. If new SRP sections need to be added, they should be numbered in such a way that existing sections are not renumbered. The numbering of any new sections should correspond to the appropriate SRP chapter with similar content.

#### **A.2 Incorporation of Future Reactor Designs**

The SRP currently addresses two types of reactor designs: boiling water reactors (BWRs) and pressurized water reactors (PWRs). The SRP Maintenance Program may expand the SRP scope to include a number of evolutionary and advanced reactor designs. Many of the design concepts for the future reactors will incorporate conventional reactor technology; some will use unconventional applications of existing technology and application of new technology. New reactor types will be incorporated in the SRP using the following guidance. (The indicated format parallels the format currently used in the SRP for BWRs and PWRs).

Any of the following approaches is acceptable. However, the approaches are presented in order of preference.

1. Make SRP sections generically applicable to all reactor types addressed in the SRP. Some sections are relatively insensitive to differences in reactor design and can be made to apply to all designs without exceptions. The SRP sections in Chapter 2 (Site Characteristics) and Chapter 17 (Quality Assurance) are examples of fully generic sections.
2. Make SRP sections as generic as possible while allowing for the inclusion of design-specific review guidance within the subsections of the SRP section. Refer to SRP Section 5.4.7 (Residual Heat Removal System) for an example of this approach.
3. Create an introductory SRP section that addresses common design aspects of different reactor concepts, and then develop a series of SRP sections that address each design specifically. Refer to SRP Section 6.2.1 and its subsections for an example of this approach.
4. Create a design-specific SRP section. In cases where a design concept is unique to a particular reactor type, there is no reasonable alternative to the preparation of a unique section for that concept. Examples of this approach are provided by

SRP Sections 5.4.1.1 (Pump Flywheel Integrity), 5.4.8 (Reactor Water Cleanup System), and 5.4.11 (Pressurizer Relief Tank).

### A.3 SRP Section Development Guidelines

The following guidance should be applied when developing new or revised SRP sections:

#### **NRC Metrication Policy**

Each numeric value associated with units should be expressed in metric SI units as described in Federal Standard 376B. The equivalent value and units in inch-pound (US standard practice English units) should follow the SI units, enclosed in parentheses, if the numeric value was originally published (in the SRP or other regulatory document) in inch-pound units.

The conversion methodology of Federal Standard 376B, Sections 4.4 and 4.5 should be followed to ensure that the dual unit or converted values are consistent. When converting units, limits (e.g., minimum and maximum values) established in regulations or in regulatory documents must be preserved during the conversion. Calculations involved in conversion should always be subjected to an independent review as described in Chapter 6.0.

#### **Event Terminology**

Discussions of design basis events in SRP sections should incorporate the resolution of NUREG-0933, Generic Safety Issue B-3, "Event Categorization," by clearly distinguishing between anticipated operational occurrences and accidents. The following can be used to assist in distinguishing between these categories of events:

Anticipated Operational Occurrences (AOOs) are those conditions of normal operation which are expected to occur one or more times during the lifetime of the plant. Acceptability is based upon GDC 10 which requires appropriate design margins to assure that specified acceptable fuel design limits are not exceeded during any condition of normal operation, including the effects of AOOs.

Accidents are events which are not expected to occur during plant lifetime but are postulated by considering credible initiating events. Acceptance Criteria associated with postulated accidents are based upon 10 CFR 100 which establishes limits for the radiological effects of the event.

Events involving multiple safety system failures are specific events required by regulation to be addressed in the plant's design. In these cases, the specific regulation specifies acceptability. Examples of such design basis events include Anticipated Transient Without Scram (10 CFR 50.62) and Station Blackout (10 CFR 50.63).

Severe Accidents are events involving multiple safety system failures but which are not addressed by a regulation specific to the event. Severe accidents are "beyond design basis" events typically identified as significant by performance of a probabilistic risk assessment. The NRC has established safety goals and a severe accident policy that requires a balance of preventive and mitigative design features to provide an acceptable level of public protection. Review of such events should be addressed in SRP Chapter 19.

#### **SRP Reference Citation Formats**

The first citation of each reference in the SRP text, except citations of CFR references and Regulatory Guides, should include a parenthetical notation identifying the References subsection item number for that document. Subsequent citations of references need not include the parenthetical reference notation.

Citations of codes and standards should not include version information unless necessary to distinguish between different versions being discussed. The version of the code or standard currently in use by the NRC staff should be identified in the References subsection.

The following styles should be used for the References subsection listing and the first Acceptance Criteria citation of CFRs:

- 10 CFR Part 50, §50.55a, "Codes and Standards."
- 10 CFR Part 50, Appendix A, General Design Criterion 10, "Reactor Design."
- 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."

Other than the initial citation in the Acceptance Criteria subsection and the References subsection listing, CFR citations for the above examples would appear as:

- 10 CFR 50.55a
- General Design Criterion 10 *or* GDC 10 (depending on whether or not GDC has been defined)
- 10 CFR Part 50, Appendix J *or* Appendix J (where the context is clear)

#### **SRP Reference Verification**

The periodic SRP-MP review of new or revised regulatory documents (described in Section 2.3 of this Implementing Procedures Document) and status of codes and standards (described in Section 2.4 of this Implementing Procedures Document) will result in periodic updating of codes and standard citations, as well as references to the following types of regulatory documents:

- |                           |                       |
|---------------------------|-----------------------|
| • NRC Regulations (Rules) | • NRC Generic Letters |
| • NRC Policy Statements   | • NRC Bulletins       |
| • Regulatory Guides       |                       |

During the preparation of revisions to existing SRP sections, references to documents and computer codes not identified above should be verified: (1) as still relevant to the review described in the SRP section; and (2) as the version currently in use by the NRC staff for its identified purpose.

#### **References to NRC Organizations**

During the preparation of new SRP sections or revisions to existing SRP sections, all references to NRC organizations should be verified as reflecting current organization names, responsibilities, and acronyms.

### **A.4 Format for Individual SRP Sections**

The following format should be followed for all SRP section content:

#### **REVIEW RESPONSIBILITIES**

Primary - *list the NRR branch with the lead (primary) responsibility for review of the subject area.*

Secondary - list any NRC branch(es) with responsibilities for a portion of the review necessary to reach the conclusions listed in Evaluation Findings.

## **I. AREAS OF REVIEW**

*Describe the objectives and the scope of the review. The description of the scope should identify which portions of the applicant's Safety Analysis Report are reviewed (if not obvious) and should specify which structures, systems or components are reviewed under the section. Discrete topics to be reviewed should be discussed in separate paragraphs with a text structure (numbered paragraphs with subheadings, etc.) that can be followed in Review Procedures and Evaluation Findings subsections. An introductory background discussion may be included to aid the reader's understanding of the need for the review.*

### **Review Interfaces**

*Describe reviews performed in other SRP Sections which relate to the topics reviewed in the SRP section and the results of which are relied upon in the overall evaluation of the SRP section. Review interfaces are typically broken down into two lists: 1) related reviews performed by the same PRB under related SRP sections; and 2) related reviews performed by other review branches under other SRP sections. Review interfaces should be listed in numbered paragraph form with separate paragraphs for different PRBs and SRP sections. Interfaces that involve a single PRB and related SRP sections can be identified as a single item. The interface descriptions should identify: 1) the related topic area(s); 2) the PRB responsible for the review; and 3) the related SRP section number(s).*

## **II. ACCEPTANCE CRITERIA**

*List the primary requirements (Acceptance Criteria) that must be met for the reviewed area to meet NRC regulations. These typically consist of General Design Criteria (GDCs) from Appendix A to 10 CFR Part 50, but may include specific regulations that apply to the areas of review. Acceptance Criteria specified for the analysis of transients and accidents shall address Generic Safety Issue B-3 by using terminology consistent with the categorization of the event being reviewed in the SRP section (refer to the discussion under SRP Section Development Guidelines - Event Terminology, above).*

*Many SRP sections also include discussion of guidance (identified as "Specific Criteria" or "specific acceptance criteria") which identifies approaches found acceptable by the NRC staff that may be followed to meet the relevant requirements of the Acceptance Criteria. Specific Criteria often reference Regulatory Guides, industry consensus codes and standards, and/or Branch Technical Positions. If included, a clear distinction should be made between Specific Criteria (guidance) and Acceptance Criteria (requirements).*

### **Technical Rationale**

*Describe each Acceptance Criterion, provide a narrative explanation of how the identified requirement applies to the topics reviewed under the section, and discuss the safety benefit of meeting the requirement. Guidance (specific criteria) may be discussed in the context of applicable Acceptance Criteria, but do not warrant separate technical rationale discussions.*

## **III. REVIEW PROCEDURES**

*Describe the steps that should be followed by the reviewer(s) and any additional guidance for how the review should be performed. This is the appropriate location to discuss staff positions such as those promulgated in such generic communications as NRC Bulletins and Generic Letters (which are not appropriate to be listed as Acceptance Criteria). If*

*several areas are reviewed under the section, the Review Procedures should be organized (with appropriate subtopic headings, etc.) consistent with the organization of Areas of Review.*

#### **IV. EVALUATION FINDINGS**

*Provide example Evaluation Findings suitable for incorporation into the staff's Safety Evaluation Report. Each Acceptance Criterion should be addressed specifically. The findings should identify the reviewer's conclusions and the bases for those conclusions. Evaluation Findings do not typically address topics covered only in Review Procedures, except as the topics relate directly to an Acceptance Criterion.*

#### **V. IMPLEMENTATION**

*Provide a description of the staff's plans for use of the SRP section, including a schedule for application of the specific section/revision and any limitations as to which types of applications the section will be used for. If staff positions that are not intended to be imposed upon a set of applicants or licensees have been added to the SRP, this subsection should clearly identify those applicants/licensees to which the positions apply.*

#### **VI. REFERENCES**

*List all documents, except SRP sections, cited in the text of the other subsections. This listing should assign a unique reference number for each document listed. Documents not cited in the SRP text should not be included in the references listing.*

*Each reference listing should include a descriptive title, any identifying document numbers, and specific date or version identification. For industry codes and standards, this is the proper location to specify the particular version of the code/standard that the staff will use in their review.*

*The references listing should be ordered as follows: 1) Code of Federal Regulation (CFR) citations in alpha-numeric order; 2) CFR appendices, including GDCs, in alpha-numeric order; 3) NRC policy statements, including Regulatory Guides, in alpha-numeric order; 4) NUREG reports; 5) generic communications such as Generic Letters and Bulletins; 6) other NRC correspondence; 7) Contractor NUREG/CRs; 8) Industry codes and standards; and 9) other documents.*

*See reference citation format guidance for styles to be used in listing of CFRs. The following style should be used for the References subsection listing of Generic Letters and Bulletins:*

- NRC Letter to All Holders of Operating Licenses for Nuclear Power Reactors With Mark I Containments, "Installation of a Hardened Wetwell Vent (Generic Letter No. 89-69)," September 1, 1989.
- NRC Bulletin to All Holders of Operating Licenses or Construction Permits for Pressurized Water Reactors, "NRC Bulletin No. 89-03: Potential Loss of Required Shutdown Margin During Refueling Operations," November 21, 1989.

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(See instructions on the reverse)

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## 10. SUPPLEMENTARY NOTES

## 11. ABSTRACT (200 words or less)

The Implementing Procedures Document (IPD) was developed by the Inspection Program Branch, Office of Nuclear Reactor Regulation, with assistance from Pacific Northwest Laboratory, for the Standard Review Plan Maintenance Program (SRP-MP). The SRP-MP was established to maintain the Standard Review Plan (SRP) on an on-going basis. The IPD provides guidance, including an overall approach and procedures, for SRP-MP tasks. The objective of the IPD is to ensure that revisions to the SRP reflect current NRC requirements and guidance, and that a consistent methodology is used to develop and revise SRP sections.

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