# Draft Inspection Manual Chapter (IMC) 0335, "Changes, Tests, and Experiments" Development & Implementation Plan

Kenneth O'Brien

Deputy Regional Administrator, Region III

Nuclear Regulatory Commission

December 1, 2020



#### Purpose & Agenda

- Nuclear Energy Institute (NEI) Provide insight following the October public meeting
- NRC Present Draft IMC 0335
- Agenda

```
12:00 – 12:10 Opening Comments/Introductions
12:10 – 12:25 NEI Presentation
12:25 – 12:45 NRC Working Group (WG) & NEI/Industry Discussion
12:45 – 1:00 NRC Presentation
1:00 – 1:40 NRC WG & NEI/Industry Discussion
1:40 – 1:50 Stakeholder Participation
1:50 – 2:00 Document Actions/Closing Remarks
```



#### **Draft IMC 0335 Development**

- Currently, there is no 10 CFR 50.59 related IMC
- NRC WG spent the last 5 months drafting the IMC
  - Derived from review of several existing documents (e.g., NEI 96-07, existing Part 9900 Guidance, and Statements of Consideration for the rule)
  - Provides clear guidance to inspectors regarding use of PRA and risk insights in 10 CFR 50.59 evaluations
    - E.g., in the 1999 Statement of Considerations, the Commission stated that the use of PRA (e.g., CDF and LERF alone) in 10 CFR 50.59 requires further rulemaking



### IMC 0335 Implementation

- IMC 0335 was made publicly available to support discussion at this public meeting (ADAMS Accession No. ML20325A150)
  - Staff will assess feedback as it finalizes the IMC
- IMC 0335 was delivered to NRC regional staff on November 20, 2020 for comment
- IMC 0335 will be implemented in late January 2021 following comment resolution period
- Staff training will be conducted:
  - Training sessions to support regional rollout of IMC 0335
  - Awareness seminars for staff at NRC Headquarters



## **Open Discussion**

