



# **Effect of Operational Relationships on Inspection Focus at NRC Licensed Fuel Cycle Facilities**

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# Inspection of Criticality Safety at Fuel Cycle Facilities

- NCS required to be administratively independent of production
- Licensees don't commit to ANS 8.19
- Requirement captured in fuel facility license
- Inspectors required to review NCS program independence

# Operational Variables

- Fuel cycle facilities production oriented
  - Competitive environment
  - Operational details may not be shared with other licensees
- Strong personalities
  - Can be good or bad
  - Not always obvious
- Commitment to specific control types
- Limited inspection resources

# Indicators of Production Orientation

- Heavy reliance on administrative controls
- Many unusual controls
  - Know ‘em when we see ‘em
- Many weak controls
  - Just don’t seem right
- Changes to weaker control types
- Inability to articulate rationale for changes

# Personality Variables

- Licensing, inspection, enforcement not personality based
  - Hire whoever you like
- Known personality issues that may affect inspection planning
  - Bias toward production
  - Bias towards specific controls
  - Conflict leading to communication problems

# Reliance on Specific Control Types

- Intentional commitment is usually to strong control type
  - Assure applicability
  - Other controls not discounted
- Licensee may have no choice
  - Failure could have widespread effect
  - Look for weak link

# Conclusion

- Many operational factors can affect an otherwise independent NCS program
- These factors play a role in the focus of NRC inspection efforts