

1.4 Review and Approval of Plans, Procedures, and Facility
Equipment and Changes Thereto

1.4.1 Plan, Procedure, and Equipment Changes Classification

The following plans and procedures are designated “Class A”

1. Standard Operating Plans
2. Emergency Plan and Procedures
3. Licensed Personnel Requalification Program
4. Industrial Security Plan (Detail not included in this manual)

The following procedures are designated “Class B”

1. Administrative Procedures
2. Operating Procedure Checklists
3. Abnormal Operating Procedures
4. Technical Specification Tests
5. Maintenance and Special Procedures Involving Nuclear Safety of the Facility
6. Preoperational tests of facility equipment and/or experimental apparatus that is designated as either class A or B.

The following plans and procedures are designated “Class C”

1. Scram Tests
2. Interlock Tests
3. Alarm Tests
4. Respiratory Procedures
5. Maintenance and Special Procedures Not Involving Nuclear Safety of the Facilities
6. Preoperational tests of facility equipment and/or experimental apparatus that is designated as class C.

1.4.1.2 Equipment Change Classification

Class A

Any change to any component or system which involves an “unreviewed safety question” is a “Class A” proposal. A proposed change “shall be deemed to involve an unreviewed safety question: (1) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased; or (2) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or (3) if the margin of safety as defined in the bases for any technical specification is reduced. (10 CFR 50.59)

Class B

Changes or modifications of reactor systems or equipment described in the SAR (other than replacement of components or parts), and not involving “unreviewed safety questions” are classified as “Class B” proposals. Any change to structures, systems or components listed below, are included in the Class B classification.

1. Core housing, core tank, and D₂O reflector tank
2. Primary and reflector piping system
3. Shim blades, regulating rod, and their drive and indicator mechanism
4. The containment, its penetrations, the isolation and pressure relief systems.
5. Neutron and coolant safety channels
6. Effluent and area radiation monitors
7. The ventilation and cover gas systems for the core and reflector tanks respectively
8. Emergency cooling system
9. The reactor fuel and the structures for its utilization and storage

Class C

Changes to equipment or components in systems which are not listed above and do not involve changes to systems described in the SAR but which will require changes in other MITR documents such as drawings, the systems manual, or written procedures.

1.4.2 Class C Review and Approval

Proposals involving Class C plans, procedures or equipment changes require review and approval. Record of review and approval is a Q/A checklist (see Procedure 1.13) and signatures on the approved document.

1.4.3 Class B Review and Approval

Proposals involving Class B plans, procedures or equipment changes require review and approval by two licensed Senior Reactor Operators, and the Director of Reactor Operations before implementation. The Director of Reactor Operations may submit any proposal to the MITRSC for its review. Where radiation protection considerations are involved, the MITR Radiation Protection Officer, or his designated alternate, shall participate in the review. These reviews and approvals are recorded on a Safety Review Form (Section 1.4.5).

1.4.4 Class A Review and Approval

In addition to the Review and Approvals required for Class B items, proposals involving Class A items and proposals must be approved by the MITRSC before implementation. In certain cases prior approval of the NRC must be obtained.

1.4.5 Safety Review Form

The attached form is intended to expedite the reviews and approvals required for Class A and B plans, procedures and equipment changes. Included and appended to each safety review shall be documentation supporting the determination of an Unreviewed Safety Question (URSQ) or lack thereof in accordance with 10CFR50.59. Each form is

given a sequential number from a master list. The completed form is circulated to all licensed personnel prior to its being permanently filed.

1.4.6 Procedure Manuals

Official copies of the procedure manuals are maintained in the reactor control room, the reactor operations office and in the office of the Reactor Radiation Protection Officer. Official copies of procedures required for use on the reactor top are kept at those locations. Official copies of individual procedures for the perchloric acid hood, the reactor floor hot cell, the utility room emergency gauges, and the pressure relief system are kept at those locations. Official copies of other procedures may be posted from time to time if the Superintendent so desires.

Safety Review Form No. _____

Item:

Submitted by _____ Date _____

Q/A number (required for all equipment changes) _____

	<u>Yes*</u>	<u>No</u>
Does the item change or contradict the Technical Specifications?	—	—
Does the item contradict the SAR?	—	—

*Attach explanation

Description of Change (Attach extra pages if necessary):

Safety Evaluation (Attach extra pages if necessary):

Summary of Review:

	<u>Yes</u>	<u>No</u>
a) Does the proposal:		
i) require a license amendment (10CFR50.59(c)(2))	—	—
ii) decrease scope of requalification program (10CFR50.54(i-1))	—	—
iii) decrease effectiveness of security plan (10CFR50.54(p))	—	—
iv) decrease effectiveness of emergency plan (10CFR50.54(q))	—	—

b) Reviewer's Comments:

Reviewer _____ Date _____

Reviewer _____ Date _____

Reviewer _____ Date _____
(Reactor Radiation Protection Officer)

Approved _____ Date _____
(Director of Reactor Operations)

Date of MITRSC approval if required _____ Date of NRC approval if required _____

List of Communications containing MITRSC additional conditions:

10 CFR 50.59 & 50.54 (p and q) changes included in Annual Report to NRC, Fiscal Year _____