

NRC LICENSEE EVENT AND CONDITION REPORTING		Identifier: MCP-2924
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INTEC	Management Control Procedure	For Additional Info: http://EDMS
		Effective Date: 02/02/12

Manual: INTEC NRC

USE TYPE 3Change Number: 335349

*The current revision can be verified on EDMS.

1. PURPOSE

Provide instructions for reporting specific events and conditions, accidental criticality, and loss of special nuclear material in accordance with 10 CFR 72.75 and 72.74.

2. SCOPE AND APPLICABILITY

This activity applies to the NRC-licensed facilities operated for DOE by the contractor for the Idaho National Laboratory.

This procedure is to be used for event investigation and reporting in conjunction with MCP-190, "Event Investigation and Occurrence Reporting," for specific events or conditions applicable to NRC-licensed facilities.

Emergency notifications to the NRC of specific events and conditions are performed using procedures implementing facility specific Emergency Response, Radiation Protection, or Physical Protection Plans for those specific events and conditions covered by such plans.

3. PREREQUISITES

None

4. INSTRUCTIONS

4.1 Specific Event or Condition Investigation and Discovery

4.1.1 ISFSI Manager: Review audit findings, NCRs, DRs, and other concerns as appropriate to promptly identify specific events or conditions with potential NRC notification or reporting requirements listed in Appendix A.

4.1.2 Any Employee: Report an event or condition involving a NRC-licensed facility to the appropriate ISFSI Manager or INTEC Shift Manager as quickly as possible.

4.1.2.1 Any Employee: Take actions to preserve conditions for continued investigation as long as these actions do not interfere with establishing a safe condition.

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- 4.1.2.2 Any Employee: Document, as requested by the ISFSI Manager or INTEC Shift Manager, significant information pertaining to the specific event or condition. Include details of actions taken to stabilize the facility or operation.
- 4.1.3 ISFSI Manager or Designee: Investigate specific events or conditions that adversely affect, or may adversely affect, the NRC-licensed facility in accordance with MCP-190 “Event Investigation and Occurrence Reporting.”
- 4.1.4 ISFSI Manager: Submit specific events or conditions with potential NRC notification or reporting requirements to Regulatory Compliance personnel for review. Include in the submittal any applicable requirements or commitments associated with the specific event or condition.
- 4.1.5 Regulatory Compliance: Review specific events or conditions as assigned by the ISFSI Manager for NRC reportability and document the basis for any negative reportability determination.
- 4.1.6 ISFSI Manager: Forward negative NRC reportability determinations to the DOE-ID Facility Director and submit a copy for ISFSI Safety Review Committee review.
- NOTE:** *“Discovery” is the date and time an event or condition is declared by management as being nonconforming and/or in violation of a NRC license condition. Indeterminate conditions are not considered to be discovered conditions.*
- 4.1.7 ISFSI Manager: For specific events or conditions declared as being nonconforming and/or in violation of a NRC license condition, ensure the date and time of discovery is recorded in an applicable log entry or event report, as appropriate.

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4.2 Reporting Specific Events and Conditions to the NRC

NOTE 1: *Reporting of specific events or conditions to the NRC may also be performed using procedures implementing facility specific Emergency Response, Radiation Protection, or Physical Protection Plans for specific events and conditions covered by those plans.*

NOTE 2: *Except under emergency or extraordinary conditions, Safeguards Information shall be transmitted only by protected telecommunications circuits (including facsimile) approved by the NRC. Physical security events required to be reported pursuant to 10 CFR 73.71 are considered to be extraordinary conditions.*

NOTE 3: *Unless requested otherwise by DOE-ID or the NRC, all reporting by the ISFSI Manager or Designee shall be through the Manager, DOE-ID or the DOE-ID Facility Director in accordance with ISFSI TS 5.6.1.*

4.2.1 ISFSI Manager or Designee: For non-emergency specific events or conditions requiring 1, 4, 8, or 24 hour NRC notification, notify the NRC Headquarters Operations Center (NRC HQ OC) via telephone at 301-816-5100 (primary) or 301-951-0550 (backup) and identify:

4.2.1.1 The paragraph of 10 CFR 72.75 or 72.74 requiring notification of the non-emergency event.

4.2.1.2 To the extent that the information is available at the time of notification, the information provided in these reports must include:

- A. The caller's name and call back telephone number,
- B. A description of the event or condition, including date and time,
- C. The exact location of the event or condition,
- D. The quantities and chemical and physical forms of the spent fuel involved in the event or condition; and
- E. Any personnel radiation exposure data.

4.2.2 ISFSI Manager or Designee: With respect to the telephone notifications made under step 4.2.1, during the course of the event:

4.2.2.1 Immediately report any further degradation in the level of safety of the ISFSI or other worsening conditions, including those that require the declaration of any of the Emergency Classes, if such a declaration has not been previously made;

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or any change from one Emergency Class to another; or a termination of the Emergency Class.

4.2.2.2 Immediately report the results of ensuing evaluations or assessments of ISFSI conditions; the effectiveness of response or protective measures taken; and information related to ISFSI behavior that is not understood.

4.2.2.3 Maintain an open, continuous communication channel with the NRC HQ OC upon request by the NRC.

NOTE: *Calls to NRC Region IV do not constitute “notification” to the NRC HQ OC when such notification is required by regulations or Technical Specifications.*

4.2.3 ISFSI Manager or Designee: For events and conditions requiring notification of the NRC HQ OC, also provide an information call to NRC Region IV at 817-860-8100.

4.2.4 ISFSI Manager or Designee: Take notes of discussion (questions and answers) during notifications to either the NRC HQ OC or NRC Region IV.

4.2.5 ISFSI Manager or Designee: If requested, prepare event or condition information in a facsimile and send to the NRC HQ OC at (301) 816-5151.

4.2.6 ISFSI Manager or Designee: Inform, if possible without unduly delaying any required notification to NRC, the DOE-ID Facility Director or the DOE-ID Duty Officer of any specific event or condition requiring notification or reporting to the NRC.

NOTE: *The DOE-ID Facility Director is the preferred point of contact with the NRC for transmittal of nonemergency communications. Contractor personnel should use caution during communications with NRC to avoid the impression of commitments being made for DOE-ID.*

4.2.7 ISFSI Manager: If a follow-up (written) notification report to the NRC is required, then notify the DOE-ID Facility Director.

4.2.8 ISFSI Manager: Ensure written reports are of sufficient quality to permit legible reproduction and optical scanning.

4.3 Specific Event or Condition Analysis

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- 4.3.1 ISFSI Manager: Refer to STD-1113 “Cause Analysis and Corrective Action Development”, for guidance in critique conduct, cause analysis, and corrective action development.
- 4.3.2 ISFSI Manager: If a critique is warranted by the event, initiate the company critique process in accordance with MCP-165 “Initial Fact Finding to Support Event Investigation”.

4.4 Follow-up Report of Specific Events and Conditions (10 CFR 72.75)

NOTE: *Written reports prepared pursuant to other regulations may be submitted to fulfill the 10 CFR 72.75 requirements if the reports contain all the necessary information and the appropriate distribution is made.*

- 4.4.1 Regulatory Compliance: Prepare written follow-up reports with the objective of submitting it to the DOE-ID Facility Director for approval and subsequent submittal to the NRC within the regulatory time requirement, typically within 30 to 60 days of the initial notification. These reports must include the following information:
- A. A brief abstract describing the major occurrences during the event, including all component or system failures that contributed to the event, and significant corrective action taken or planned to prevent recurrence,
 - B. A clear, specific, narrative description of the event that occurred so that knowledgeable readers conversant with the design of an ISFSI, but not familiar with the details of the particular facility, can understand the complete event (the narrative description must include specific information listed in 10 CFR 72.75(g)(2)(i) through (xii) as appropriate for the particular event),
 - C. An assessment of the safety consequences and implications of the event. This assessment must include the availability of other systems or components that could have performed the same function as the components and systems that failed during the event,
 - D. A description of any corrective actions planned as a result of the event, including those to reduce the probability of similar events occurring in the future,
 - E. Reference to any previous similar events at the same facility that are known to the licensee,

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- F. The name and telephone number of a person within the licensee's organization who is knowledgeable about the event and can provide additional information concerning the event and the facility's characteristics; and
- G. The extent of exposure of individuals to radiation or to radioactive materials without identification of individuals by name.

4.5 Report Submittal

- 4.5.1 ISFSI Manager: If a final report cannot be submitted in time, then prepare a preliminary report to ensure the regulatory time requirement is not exceeded.
- 4.5.2 ISFSI Manager: Ensure the report includes the information required by the NRC in the applicable regulations.
- 4.5.3 ISFSI Manager: Ensure appropriate ISFSI support personnel review the report before submitting the report to the DOE-ID Facility Director.
- 4.5.4 ISFSI Manager: Forward report to the DOE-ID Facility Director for approval and transmittal to NRC in accordance with FSV/TMI TS 5.6.1.
- 4.5.5 ISFSI Manager: Forward approved report to the ISFSI Safety Review Committee for oversight review in accordance with FSV/TMI TS 5.2.1.4.
- 4.5.6 ISFSI Manager: If supplemental information is requested by the NRC in writing, prepare a report containing the requested information as a supplement to the initial written report and forward to the DOE-ID Facility Director for approval and transmittal to NRC in accordance with FSV/TMI TS 5.6.1.

5. RECORDS

NOTE: [MCP-557, "Records Management,"](#) the [INL Records Schedule Matrix](#), and associated [record types list\(s\)](#) provide current information on the storage, turnover, and retention requirements for these records.

NRC reportability determinations.

Records of each event or condition reported to the NRC which include (1) documents of investigations and data used in the report, and (2) the approved report.

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6. DEFINITIONS

Discovery. The date and time an event or condition is declared by management as being nonconforming and/or in violation of a NRC license condition. Discovery may be immediate if there is no uncertainty (such as the detection of a Technical Specification violation) or may be preceded by an investigation period if there is uncertainty (such as an event with indeterminate conditions). Indeterminate conditions are not considered to be discovered conditions.

NRC Reportability Determination. The determination of the applicability of NRC reporting criteria (if any) to potentially adverse events or conditions associated with a NRC-licensed facility.

7. REFERENCES

10 CFR 20.2201, “Reports of Theft or Loss of Licensed Material”

10 CFR 20.2202, “Notification of [Radiological] Incidents”

10 CFR 20.2203, “Reports of Exposures, Radiation Levels, and Concentrations of Radioactive Material Exceeding the Constraints or Limits”

10 CFR 21, “Reporting of Defects and Noncompliance”

10 CFR 72.74, “Reports of Accidental Criticality or Loss of Special Nuclear Material”

10 CFR 72.75, “Reporting Requirements for Specific Events and Conditions”

10 CFR 73, Appendix G, “Reportable Safeguards Events”

10 CFR 73.71, “Reporting of Safeguards Events”

40 CFR 190, “Environmental Radiation Protection Standards for Nuclear Power Operations”

Fort St. Vrain Independent Spent Fuel Storage Installation Technical Specifications

Fort St. Vrain Independent Spent Fuel Storage Installation Safety Analysis Report

MCP-165 “Initial Fact Finding to Support Event Investigation”

MCP-190, “Event Investigation and Occurrence Reporting”

MCP-2925, “Screen and Evaluate Changes”

MCP-2928, “10 CFR 21 Process”

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MCP-3177, “ISFSI License Basis Documents

PRD-317, “Radiation Protection, Safety and Health, and Environmental Protection Programs for NRC Regulated Facilities”

STD-1113 “Cause Analysis and Corrective Action Development”

Three Mile Island Unit 2 Independent Spent Fuel Storage Installation Technical Specifications

Three Mile Island Unit 2 Independent Spent Fuel Storage Installation Safety Analysis Report

8. APPENDIXES

Appendix A, Reporting Criteria

Appendix B, Procedure Basis

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Appendix A

Reporting Criteria

1. The reporting criteria presented below list the NRC Notification for each criterion. NRC (verbal) Notifications are designated as Immediate, 1 hour, 4 hour, 8 hour, and 24 hour. Criteria for follow-up written reports are also presented in the table below.
2. Step 4.2 of this MCP directs the timely notification requirements to the NRC HQ OC.
3. Step 4.4 directs the follow-up written report requirements to the NRC HQ OC.
4. The Major Criteria Groups of DOE categorized occurrences listed in MCP-190, “Event Investigation and Occurrence Reporting,” reported to the NRC are listed below:

Group 01 - Operational Emergencies

Group 03 - Nuclear Safety Basis

Group 04 - Facility Status

Group 06 - Contamination/Radiation Control

Group 10 - Management Concerns/Issues

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GROUP 1 – OPERATIONAL EMERGENCIES		
Reference		NRC Notification
10 CFR 72.75(a)	Declaration of an Emergency or Notice of Unusual Event (NOUE) at an NRC Licensed Facility as specified in the licensee’s approved emergency plan (<i>Note: this notification would typically be made via the Emergency Response Plan</i>).	Within 1 hour of declaring an emergency or NOUE
10 CFR 72.74(a)	Accidental criticality at a NRC Licensed Facility. (<i>Note: this notification would typically be made via the Emergency Response Plan</i>)	1 hour
10 CFR 72.75(b)(1)	An event involving NRC Licensed spent fuel where an action taken in an emergency that departs from a condition or a technical specification contained in a license or certificate of compliance issued under 10 CFR 72 when the action is immediately needed to protect the public health and safety, and no action consistent with license or certificate of compliance conditions or technical specifications that can provide adequate or equivalent protection is immediately apparent.	As soon as possible but no later than 4 hours after discovery of the event or condition

GROUP 3 – NUCLEAR SAFETY BASIS		
Reference	Subgroup A - Technical Safety Requirement Violations	NRC Notification
FSV/TMI ISFSI TS 5.6.2	Noncompliance with the Limiting Conditions for Operations, Surveillance Requirements, Design Features, or Administrative Controls contained within the NRC Licensed ISFSI Technical Specifications.	Written report within 30 days of discovery
Reference	Subgroup B - Documented Safety Requirement Inadequacies	NRC Notification
ISFSI TS 5.5.1 ISFSI TS 5.5.2	Unreviewed Safety Question Determination for NRC ISFSIs are conducted per MCP-2925 and reports made per MCP-3177.	

GROUP 4 – Facility Status		
Reference	Subgroup A - Safety Structure/System/Component Degradation (See Chapter 3 of ISFSI SAR for list of items important to safety)	NRC Notification
10 CFR 72.75(c)(1)	A defect in any NRC Licensed spent fuel storage structure, system, or component that is important to safety.	8 hour
10 CFR 72.75(c)(2)	A significant reduction in the effectiveness of any NRC Licensed spent fuel waste storage confinement system during use.	8 hour

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GROUP 4 – Facility Status		
10 CFR 72.75(d)(1)	An event involving NRC Licensed spent fuel in which important to safety equipment is disabled or fails to function as designed when: <ol style="list-style-type: none"> 1. The equipment is required by regulation, license condition, or certificate of compliance to be available and operable to prevent released that could exceed regulatory limits, to prevent exposures to radiation or radioactive materials that could exceed regulatory limits, or to mitigate the consequences of an accident; and 2. No redundant equipment was available and operable to perform the required safety function. 	24 hour
ISFSI TS 2.2	Any Functional and Operating Limits at the TMI-2 or FSV ISFSI are violated.	24 hour Written report within 30 days of the occurrence.
Reference	Subgroup C – Suspect/Counterfeit and Defective Items or Material	NRC Notification
10 CFR 72.75(c)(2)	A significant reduction in the effectiveness of any NRC Licensed spent fuel waste storage confinement system during use.	8 hour
10 CFR 21.21 (d)(3)(i) 10 CFR 72(a) MCP-2928	An evaluation resulting in the identification of deviations and failures to comply to identify defects and failures to comply associated with substantial safety hazards.	Initial facsimile notification within two days and written notification within 30 days, following receipt of information on the identification of a defect or a failure to comply
10 CFR 21.21 (d)(3)(ii) MCP-2928	An evaluation of an identified deviation or failure to comply potentially associated with a substantial safety hazard cannot be completed within 60 days from discovery of the deviation or failure to comply.	Interim report submitted in writing within 60 days of discovery of the deviation or failure to comply

GROUP 6 – CONTAMINATION/RADIATION CONTROL		
Reference	Subgroup A – Loss of Control of Radioactive Materials	NRC Notification
10 CFR 20.2201(a)(1)(i) PRD-317	For NRC Licensed Facilities, any lost, stolen, or missing licensed material in an aggregate quantity equal to or greater than 1,000 times the quantity specified in appendix C to part 20 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas.	Immediately after its occurrence becomes known to the licensee

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GROUP 6 – CONTAMINATION/RADIATION CONTROL		
10 CFR 20.2201(a)(1)(ii) 10 CFR 20.2201(c) PRD-317	For NRC Licensed Facilities, any lost, stolen, or missing licensed material becomes known to the licensee, all licensed material in a quantity greater than 10 times the quantity specified in appendix C to 10 CFR 20 that is still missing at this time. Subsequent to filing the written report, the licensee shall also report any additional substantive information on the loss or theft within 30 days after the licensee learns of such information.	Written report within 30 days of the occurrence
10 CFR 20.2202(b)(1) PRD-317	Any event involving loss of control of licensed material possessed by the licensee that may have caused, or threatens to cause an individual to receive, in a period of 24 hours- <ol style="list-style-type: none"> 1. A total effective dose equivalent exceeding 5 rems (0.05 Sv); or 2. A lens dose equivalent exceeding 15 rems (0.15 Sv); or 3. A shallow-dose equivalent to the skin or extremities exceeding 50 rems (0.5 Sv). 	Within 24 hours of discovery of the event
Reference	Subgroup C – Radiation Exposure	NRC Notification
10 CFR 20.2202(a)(2) PRD-317	Release of radioactive material, inside or outside of a NRC Licensed Facility restricted area, so that, had an individual been present for 24 hours, the individual could have received an intake five times the annual limit on intake (the provisions of this paragraph do not apply to locations where personnel are not normally stationed during routine operations, such as hot-cells or process enclosures).	Immediate
10 CR 20.2202(b)(2) PRD-317	Release of radioactive material, inside or outside of a NRC Licensed Facility restricted area, so that, had an individual been present for 24 hours, the individual could have received an intake in excess of one occupational annual limit on intake (the provisions of this paragraph do not apply to locations where personnel are not normally stationed during routine operations, such as hot-cells or process enclosures).	Within 24 hours of discovery of the event
10 CFR 20.2202(a)(1) PRD-317	Any event involving licensed material possessed by the licensee (byproduct, source, or special nuclear material) that may have caused or threatens to cause an individual to receive- <ol style="list-style-type: none"> 1. A total effective dose equivalent of 25 rems (0.25 Sv) or more; or 2. A lens dose equivalent of 75 rems (0.75 Sv) or more; or 3. A shallow-dose equivalent to the skin or extremities of 250 rads (2.5 Gy) or more. 	Immediate
10 CFR 20.2203(a)(4) PRD-317	For NRC Licensed Facilities, levels of radiation or releases of radioactive material in excess of standards in 40 CFR part 190.	Written report within 30 days of learning of the occurrence

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GROUP 6 – CONTAMINATION/RADIATION CONTROL		
10 CFR 20.2203(a) PRD-317	Each NRC licensee shall submit a written report after learning of any of the following occurrences: 1. Any incident for which notification is required by 10 CFR 20.2202; or 2. Doses in excess of any of the following: a. The occupational dose limits for adults in 10 CFR 20.1201; or b. The occupational dose limits for a minor in 10 CFR 20.1207; or c. The limits for an embryo/fetus of a declared pregnant woman in 10 CFR 20.1208; or d. The limits for an individual member of the public in 10 CFR 20.1301; or 3. Levels of radiation or concentrations of radioactive material in an unrestricted area in excess of 10 times any applicable limit set forth in this part or in the license (whether or not involving exposure of any individual in excess of the limits in 10 CFR 20.1301).	Written report within 30 days after learning of the occurrences

GROUP 10 – Management Concerns/Issues		
Reference	Note: <i>DOE is the licensee for the Fort St. Vrain and TMI-2 ISFSIs and is in-and-of-itself a self-regulated Government agency. It is DOE's interpretation that internal non-emergency notifications are not intended to require parallel NRC notification under 10 CFR 72.75(b)(2). However, if DOE is required to notify another government agency other than itself (e.g. EPA), similar notification will be made to the NRC per 10 CFR 72.75(b)(2).</i>	NRC Notification
10 CFR 72.75(b)(2)	Any event or situation involving NRC Licensed spent fuel and related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other Government agencies has been or will be made. Such an event may include an onsite fatality or inadvertent release of radioactively contaminated materials.	4 hour
10 CFR 72.75(c)(3)	Any event requiring the transport of a radioactively contaminated person to an offsite medical facility for treatment	8 hour

10 CFR 73.71 – Reporting Safeguards Events		
Reference	NRC Notification	
10 CFR 73.71(a)(1) 10 CFR 72.74	Discovery of the loss of any shipment of SNM or spent fuel, or the recovery of or accounting for such lost shipment Within one hour of discovery, followed by a written report within 60 days.	

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10 CFR 73.71 – Reporting Safeguards Events		
Reference		NRC Notification
10 CFR 73 Appendix G	1 (a) Any event in which there is reason to believe that a person has committed or caused, or attempted to commit or cause, or has made a credible threat to commit or cause: <ul style="list-style-type: none"> i. A theft or unlawful diversion of special nuclear material; or ii. Significant physical damage to a power reactor or any facility possessing SSNM or its equipment or carrier equipment transporting nuclear fuel or spent nuclear fuel, or to the nuclear fuel or spent nuclear fuel a facility or carrier possesses; or iii. Interruption of normal operation of a licensed nuclear power reactor through the unauthorized use of or tampering with its machinery, components, or controls including the security system. (b) An actual entry of an unauthorized person into a protected area, material access area, controlled access area, vital area, or transport. (c) Any failure, degradation, or the discovered vulnerability in a safeguard system that could allow unauthorized or undetected access to a protected area, material access area, controlled access area, vital area, or transport for which compensatory measures have not been employed. (d) The actual or attempted introduction of contraband into a protected area, material access area, vital area, or transport.	Within one hour of discovery, followed by a written report within 60 days.

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Appendix B

Procedure Basis

Step	Basis	Source	Citation
Entire procedure	Written procedures shall be established, implemented, and maintained for the following: reporting.	FSV TS TMI TS ISFF TS	5.4.1.n 5.4.1.o 5.4.1.n
Entire procedure	Written procedures shall be established, implemented, and maintained for the following: administrative controls.	FSV/TMI/ISFF TS	5.4.1.a
2	<p>Applicability: The requirements of this section apply to:</p> <p>(1) (i) Licensees issued a specific license under §72.40; and</p> <p>(ii) Licensees issued a general license under §72.210, after the licensee has placed spent fuel on the ISFSI storage pad (if the ISFSI is located inside the collocated protected area, for a reactor licensed under part 50 of this chapter) or after the licensee has transferred spent fuel waste outside the reactor licensee's protected area to the ISFSI storage pad (if the ISFSI is located outside the collocated protected area, for a reactor licensed under part 50 of this chapter).</p> <p>(2) Those non-emergency events specified in paragraphs (b), (c), and (d) of this section that occurred within 3 years of the date of discovery.</p>	10 CFR 72.75 (i)	
4.2.1 LST-26	<p>Initial notification: Reports made by licensees in response to the requirements of this section must be made as follows:</p> <p>(1) Licensees shall make reports required by paragraphs (a), (b), (c), or (d) of this section by telephone to the NRC Headquarters Operations Center.²</p> <p>²The commercial telephone number of the NRC Headquarters Operations Center is (301) 816-5100. Those licensees with an available Emergency Notification System (ENS) shall use the ENS to notify the NRC Headquarters Operations Center.</p> <p>(2) When making a report under paragraphs (a), (b), (c), or (d) of this section, the licensee shall identify:</p> <p>(i) The Emergency Class declared; or</p> <p>(ii) Paragraph (b), “four-hour reports,” paragraph (c), “eight-hour reports,” or paragraph (d), “24-hour reports,” as the paragraph of this section requiring notification of the non-emergency</p>	10 CFR 72.75 (e)	

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	event. (3) To the extent that the information is available at the time of notification, the information provided in these reports must include: (i) The caller's name and call back telephone number; (ii) A description of the event, including date and time; (iii) The exact location of the event; (iv) The quantities and chemical and physical forms of the spent fuel, HLW, or reactor-related GTCC waste involved in the event; and (v) Any personnel radiation exposure data.		
4.2.1 LST-26	Reports made by licensees in response to the requirements of this section must be made as follows: (1) Licensees having an installed Emergency Notification System shall make the reports required by paragraphs (a) and (b) of this section to the NRC Operations Center in accordance with 10 CFR 50.72; and (2) All other licensees shall make the reports required by paragraphs (a) and (b) of this section by telephone to the NRC Operations Center (301) 816-5100.	10 CFR 20.2202 (d)	
4.2.2	Follow-up notification: With respect to the telephone notifications made under paragraphs (a), (b), (c) or (d) of this section, in addition to making the required initial notification, each licensee shall during the course of the event: (1) Immediately report any further degradation in the level of safety of the ISFSI or MRS or other worsening conditions, including those that require the declaration of any of the Emergency Classes, if such a declaration has not been previously made; or any change from one Emergency Class to another; or a termination of the Emergency Class. (2) Immediately report the results of ensuing evaluations or assessments of ISFSI or MRS conditions; the effectiveness of response or protective measures taken; and information related to ISFSI or MRS behavior that is not understood. (3) Maintain an open, continuous communication channel with the NRC Headquarters Operations Center upon request by the NRC.	10 CFR 72.75 (f)	

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Step	Basis	Source	Citation
4.4	The initial telephonic notification must be followed within a period of 60 days by a written report submitted to the NRC by an appropriate method listed in §73.4. In addition to the addressees specified in §73.4, the licensee shall also provide one copy of the written report addressed to the Director, Division of Nuclear Security, Office of Nuclear Security and Incident Response. The report must include sufficient information for NRC analysis and evaluation.	10 CFR 73.71 (a)(4)	
4.4	Supplemental information: The Commission may require the licensee to submit specific additional information beyond that required by paragraph (g) of this section if the Commission finds that supplemental material is necessary for complete understanding of an unusually complex or significant event. These requests for supplemental information will be made in writing, and the licensee shall submit, as specified in §72.4, the requested information as a supplement to the initial written report.	10 CFR 72.75 (h)	

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Step	Basis	Source	Citation
4.4.1	<p>Preparation and submission of written reports. Each licensee who makes an initial notification required by paragraphs (b)(1), (c)(1), (c)(2), or (d)(1) of this section shall also submit a written follow-up report to the Commission within 60 days of the initial notification. Written reports prepared pursuant to other regulations may be submitted to fulfill this requirement if the reports contain all the necessary information and the appropriate distribution is made. These written reports must be of sufficient quality to permit legible reproduction and optical scanning and must be submitted to the NRC in accordance with §72.4. These reports must include the following information:</p> <ol style="list-style-type: none"> (1) A brief abstract describing the major occurrences during the event, including all component or system failures that contributed to the event and significant corrective action taken or planned to prevent recurrence; (2) A clear, specific, narrative description of the event that occurred so that knowledgeable readers conversant with the design of an ISFSI or MRS, but not familiar with the details of a particular facility, can understand the complete event. (3) An assessment of the safety consequences and implications of the event. This assessment must include the availability of other systems or components that could have performed the same function as the components and systems that failed during the event; (4) A description of any corrective actions planned as a result of the event, including those to reduce the probability of similar events occurring in the future; (5) Reference to any previous similar events at the same facility that are known to the licensee; (6) The name and telephone number of a person within the licensee's organization who is knowledgeable about the event and can provide additional information concerning the event and the facility's characteristics; and (7) The extent of exposure of individuals to radiation or to radioactive materials without identification of individuals by name. 	10 CFR 72.75 (g)	

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Step	Basis	Source Document	Citation
4.5	<p>Written reports. Each licensee required to make a report under paragraph (a) of this section shall, within 30 days after making the telephone report, make a written report setting forth the following information:</p> <ul style="list-style-type: none"> (i) A description of the licensed material involved, including kind, quantity, and chemical and physical form; and (ii) A description of the circumstances under which the loss or theft occurred; and (iii) A statement of disposition, or probable disposition, of the licensed material involved; and (iv) Exposures of individuals to radiation, circumstances under which the exposures occurred, and the possible total effective dose equivalent to persons in unrestricted areas; and (v) Actions that have been taken, or will be taken, to recover the material; and (vi) Procedures or measures that have been, or will be, adopted to ensure against a recurrence of the loss or theft of licensed material. 	10 CFR 20.2201 (b)(1)	
4.5	<p>Reports must be made as follows:</p> <ul style="list-style-type: none"> (i) For holders of an operating license for a nuclear power plant, the events included in paragraph (b) of this section must be reported in accordance with the procedures described in §50.73(b), (c), (d), (e), and (g) of this chapter and must include the information required in paragraph (b)(1) of this section, and (ii) All other licensees shall make reports to the Administrator of the appropriate NRC Regional Office listed in appendix D to part 20. 	10 CFR 20.2201 (b)(2)	
4.5	<p>The licensee shall prepare any report filed with the Commission pursuant to this section so that names of individuals who may have received exposure to radiation are stated in a separate and detachable part of the report.</p>	10 CFR 20.2201 (d) 10 CFR 20.2202 (c)	
4.5	<p>The provisions of this section do not include doses that result from planned special exposures, that are within the limits for planned special exposures, and that are reported under §20.2204.</p>	10 CFR 20.2202 (e)	

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Step	Basis	Source Document	Citation
4.5	<p>Contents of reports.</p> <p>(1) Each report required by paragraph (a) of this section must describe the extent of exposure of individuals to radiation and radioactive material, including, as appropriate:</p> <ul style="list-style-type: none"> (i) Estimates of each individual's dose; and (ii) The levels of radiation and concentrations of radioactive material involved; and (iii) The cause of the elevated exposures, dose rates, or concentrations; and (iv) Corrective steps taken or planned to ensure against a recurrence, including the schedule for achieving conformance with applicable limits, ALARA constraints, generally applicable environmental standards, and associated license conditions. <p>(2) Each report filed pursuant to paragraph (a) of this section must include for each occupationally overexposed individual¹: the name, Social Security account number, and date of birth. The report must be prepared so that this information is stated in a separate and detachable part of the report and must be clearly labeled "Privacy Act Information: Not for Public Disclosure."</p> <p>¹With respect to the limit for the embryo/fetus (§20.1208), the identifiers should be those of the declared pregnant woman.</p>	10 CFR 20.2203 (b)	
4.5.4	All reports required by 10 CFR Part 72 for the TMI-2 ISFSI and FSV ISFSI and all reports required by the TMI-2 and FSV ISFSIs license and Technical Specifications, shall be submitted by the Manager, DOE-Idaho or the DOE-Idaho TMI-2 or FSV Facility Director.	FSV/TMI TS	5.6.1
4.5.4	Providing event reports to the ISFSI Safety Review Committee for oversight review allows the committee to implement one of its TS requirements.	FSV/TMI TS	5.2.1.4
4.5.4	All reports required by 10 CFR Part 72 for the TMI-2 and FSV ISFSIs and all reports required by the TMI-2 and FSV ISFSI licenses and TS, shall be submitted by the Manager of DOE-Idaho or the DOE-Idaho Facility Director.	FSV/TMI TS	5.6.1

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Step	Basis	Source Document	Citation
Appendix A Group 1	Emergency notifications: Each licensee shall notify the NRC Headquarters Operations Center upon the declaration of an emergency as specified in the licensee's approved emergency plan addressed in §72.32. The licensee shall notify the NRC immediately after notification of the appropriate State or local agencies, but not later than one hour after the time the licensee declares an emergency.	10 CFR 72.75 (a)	
Appendix A Group 1 Appendix A Group 10	Non-emergency notifications: Four-hour reports. Each licensee shall notify the NRC as soon as possible but not later than four hours after the discovery of any of the following events or conditions involving spent fuel, HLW, or reactor-related GTCC waste: (1) An action taken in an emergency that departs from a condition or a technical specification contained in a license or certificate of compliance issued under this part when the action is immediately needed to protect the public health and safety, and no action consistent with license or certificate of compliance conditions or technical specifications that can provide adequate or equivalent protection is immediately apparent. (2) Any event or situation related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other Government agencies has been or will be made. Such an event may include an onsite fatality or inadvertent release of radioactively contaminated materials.	10 CFR 72.75 (b)	
Appendix A Group 3 Subgroup A	All instances of noncompliance with the Limiting Conditions for Operations, Surveillance Requirements, Design Features, or Administrative Controls contained within these TS shall be reported in writing to the NRC Document Control Desk within 30 days of discovery of the noncompliance. Copies shall be provided to the Director, Office of Nuclear Material Safety and Safeguards, and the Regional Administrator, Region IV.	FSV/TMI TS	5.6.2
Appendix A Group 3 Subgroup B	Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.	FSV/TMI/ISFF TS	5.5.1
Appendix A Group 3 Subgroup B	Changes to essential programs shall be made under appropriate administrative controls and reviews.	FSV/TMI TS	5.5.2

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Step	Basis	Source Document	Citation
Appendix A Group 4 Subgroup A	Non-emergency notifications: 24-hour reports. Each licensee shall notify the NRC within 24 hours after the discovery of any of the following events involving spent fuel, HLW, or reactor-related GTCC waste: (1) An event in which important to safety equipment is disabled or fails to function as designed when: (i) The equipment is required by regulation, license condition, or certificate of compliance to be available and operable to prevent releases that could exceed regulatory limits, to prevent exposures to radiation or radioactive materials that could exceed regulatory limits, or to mitigate the consequences of an accident; and (ii) No redundant equipment was available and operable to perform the required safety function. (2) For notifications made under this paragraph, the licensee may delay the notification to the NRC if the end of the 24-hour period occurs outside of the NRC's normal working day (i.e., 7:30 a.m. to 5:00 p.m. Eastern time), on a weekend, or a Federal holiday. In these cases, the licensee shall notify the NRC before 8:00 a.m. Eastern time on the next working day.	10 CFR 72.75 (d)	
Appendix A Group 4 Subgroup A	If the Functional and Operating Limit is violated, the following actions shall be completed: 4.2.1 The affected TMI-2 Canisters shall be placed in a safe condition. 4.2.2 Within 24 hours, notify the NRC Operations Center. 2.2.3 Within 30 days, submit a special report which describes the cause of the violation and actions taken to restore compliance and prevent recurrence.	TMI TS	2.2
Appendix A Group 4 Subgroup C	Non-emergency notifications: Eight-hour reports. Each licensee shall notify the NRC as soon as possible but not later than eight hours after the discovery of any of the following events or conditions involving spent fuel, HLW, or reactor-related GTCC waste: (1) A defect in any spent fuel, HLW, or reactor-related GTCC waste storage structure, system, or component that is important to safety. (2) A significant reduction in the effectiveness of any spent fuel, HLW, or reactor-related GTCC waste storage confinement system during use. (3) Any event requiring the transport of a radioactively contaminated person to an offsite medical facility for treatment.	10 CFR 72.75 (c)	

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Step	Basis	Source Document	Citation
Appendix A Group 4 Subgroup C	<p>(1) A director or responsible officer subject to the regulations of this part or a person designated under §21.21(d)(5) must notify the Commission when he or she obtains information reasonably indicating a failure to comply or a defect affecting-</p> <ul style="list-style-type: none"> (i) The construction or operation of a facility or an activity within the United States that is subject to the licensing requirements under parts 30, 40, 50, 60, 61, 63, 70, 71, or 72 of this chapter and that is within his or her organization's responsibility; or (ii) A basic component that is within his or her organization's responsibility and is supplied for a facility or an activity within the United States that is subject to the licensing requirements under parts 30, 40, 50, 60, 61, 63, 70, 71, or 72 of this chapter. <p>(2) The notification to NRC of a failure to comply or of a defect under paragraph (d)(1) of this section and the evaluation of a failure to comply or a defect under paragraphs (a)(1) and (a)(2) of this section, are not required if the director or responsible officer has actual knowledge that the Commission has been notified in writing of the defect or the failure to comply.</p> <p>(3) Notification required by paragraph (d)(1) of this section must be made as follows-</p> <ul style="list-style-type: none"> (i) Initial notification by facsimile, which is the preferred method of notification, to the NRC Operations Center at (301) 816-5151 or by telephone at (301) 816-5100 within two days following receipt of information by the director or responsible corporate officer under paragraph (a)(1) of this section, on the identification of a defect or a failure to comply. Verification that the facsimile has been received should be made by calling the NRC Operations Center. This paragraph does not apply to interim reports described in §21.21(a)(2). (ii) Written notification to the NRC at the address specified in §21.5 within 30 days following receipt of information by the director or responsible corporate officer under paragraph (a)(3) of this section, on the identification of a defect or a failure to comply. 	10 CFR 21.21 (d)	

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Step	Basis	Source Document	Citation
<p>Appendix A Group 4 Subgroup C</p> <p>LST-26</p>	<p>Each individual, corporation, partnership, dedicating entity, or other entity subject to the regulations in this part shall adopt appropriate procedures to:</p> <ol style="list-style-type: none"> (1) Evaluate deviations and failures to comply to identify defects and failures to comply associated with substantial safety hazards as soon as practicable, and, except as provided in paragraph (a)(2) of this section, in all cases within 60 days of discovery, in order to identify a reportable defect or failure to comply that could create a substantial safety hazard, were it to remain uncorrected, and (2) Ensure that if an evaluation of an identified deviation or failure to comply potentially associated with a substantial safety hazard cannot be completed within 60 days from discovery of the deviation or failure to comply, an interim report is prepared and submitted to the Commission through a director or responsible officer or designated person as discussed in §21.21(d)(5). The interim report should describe the deviation or failure to comply that is being evaluated and should also state when the evaluation will be completed. This interim report must be submitted in writing within 60 days of discovery of the deviation or failure to comply. (3) Ensure that a director or responsible officer subject to the regulations of this part is informed as soon as practicable, and, in all cases, within the 5 working days after completion of the evaluation described in §21.21(a)(1) or §21.21(a)(2) if the construction or operation of a facility or activity, or a basic component supplied for such facility or activity- <ol style="list-style-type: none"> (i) Fails to comply with the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order, or license of the Commission relating to a substantial safety hazard, or (ii) Contains a defect. <ol style="list-style-type: none"> (b) If the deviation or failure to comply is discovered by a supplier of basic components, or services associated with basic components, and the supplier determines that it does not have the capability to perform the evaluation to determine if a defect exists, then the supplier must inform the purchasers or affected licensees within five working days of this determination so that the purchasers or affected licensees may evaluate the deviation or failure to comply, pursuant to §21.21(a). 	<p>10 CFR 72(a)</p>	

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Step	Basis	Source Document	Citation
Appendix A Group 6 Subgroup A	<p>Telephone reports. Each licensee shall report by telephone as follows:</p> <ul style="list-style-type: none"> (i) Immediately after its occurrence becomes known to the licensee, any lost, stolen, or missing licensed material in an aggregate quantity equal to or greater than 1,000 times the quantity specified in appendix C to part 20 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas; or (ii) Within 30 days after the occurrence of any lost, stolen, or missing licensed material becomes known to the licensee, all licensed material in a quantity greater than 10 times the quantity specified in appendix C to part 20 that is still missing at this time. <p>(2) Reports must be made as follows:</p> <ul style="list-style-type: none"> (i) Licensees having an installed Emergency Notification System shall make the reports to the NRC Operations Center in accordance with §50.72 of this chapter, and (ii) All other licensees shall make reports by telephone to the NRC Operations Center (301-816-5100). 	10 CFR 20.2201 (a)(1)	
Appendix A Group 6 Subgroup A	<p>Subsequent to filing the written report, the licensee shall also report any additional substantive information on the loss or theft within 30 days after the licensee learns of such information.</p>	10 CFR 20.2201 (c)	
Appendix A Group 6 Subgroup A	<p>Twenty-four hour notification. Each licensee shall, within 24 hours of discovery of the event, report any event involving loss of control of licensed material possessed by the licensee that may have caused, or threatens to cause, any of the following conditions:</p> <ul style="list-style-type: none"> (1) An individual to receive, in a period of 24 hours: <ul style="list-style-type: none"> (i) A total effective dose equivalent exceeding 5 rems (0.05 Sv); or (ii) A lens dose equivalent exceeding 15 rems (0.15 Sv); or (iii) A shallow-dose equivalent to the skin or extremities exceeding 50 rems (0.5 Sv); or (2) The release of radioactive material, inside or outside of a restricted area, so that, had an individual been present for 24 hours, the individual could have received an intake in excess of one occupational annual limit on intake (the provisions of this paragraph do not apply to locations where personnel are not normally stationed during routine operations, such as hot-cells or process enclosures). 	10 CFR 20.2202 (b)	

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Step	Basis	Source Document	Citation
<p>Appendix A Group 6 Subgroup C</p>	<p>Immediate notification. Notwithstanding any other requirements for notification, each licensee shall immediately report any event involving byproduct, source, or special nuclear material possessed by the licensee that may have caused or threatens to cause any of the following conditions:</p> <p>(1) An individual to receive:</p> <ul style="list-style-type: none"> (i) A total effective dose equivalent of 25 rems (0.25 Sv) or more; or (ii) A lens dose equivalent of 75 rems (0.75 Sv) or more; or (iii) A shallow-dose equivalent to the skin or extremities of 250 rads (2.5 Gy) or more; or <p>(2) The release of radioactive material, inside or outside of a restricted area, so that, had an individual been present for 24 hours, the individual could have received an intake five times the annual limit on intake (the provisions of this paragraph do not apply to locations where personnel are not normally stationed during routine operations, such as hot-cells or process enclosures).</p>	<p>10 CFR 20.2202 (a)</p>	

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Step	Basis	Source Document	Citation
Appendix A Group 6 Subgroup C	<p>Reportable events. In addition to the notification required by §20.2202, each licensee shall submit a written report within 30 days after learning of any of the following occurrences:</p> <p>(1) Any incident for which notification is required by §20.2202; or</p> <p>(2) Doses in excess of any of the following:</p> <ul style="list-style-type: none"> (i) The occupational dose limits for adults in §20.1201; or (ii) The occupational dose limits for a minor in §20.1207; or (iii) The limits for an embryo/fetus of a declared pregnant woman in §20.1208; or (iv) The limits for an individual member of the public in §20.1301; or (v) Any applicable limit in the license; or (vi) The ALARA constraints for air emissions established under §20.1101(d); or <p>(3) Levels of radiation or concentrations of radioactive material in:</p> <ul style="list-style-type: none"> (i) A restricted area in excess of any applicable limit in the license; or (ii) An unrestricted area in excess of 10 times any applicable limit set forth in this part or in the license (whether or not involving exposure of any individual in excess of the limits in §20.1301); or <p>(4) For licensees subject to the provisions of EPA's generally applicable environmental radiation standards in 40 CFR part 190, levels of radiation or releases of radioactive material in excess of those standards, or of license conditions related to those standards.</p>	10 CFR 20.2203 (a)	

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Step	Basis	Source Document	Citation
Appendix A Reporting Safeguards Events	(1) Events to be reported within one hour of discovery, followed by a written report within 60 days. <ul style="list-style-type: none"> (i) Any event in which there is reason to believe that a person has committed or caused, or attempted to commit or cause, or has made a credible threat to commit or cause: <ul style="list-style-type: none"> (a) A theft or unlawful diversion of special nuclear material; or (b) Significant physical damage to a power reactor or any facility possessing SSNM or its equipment or carrier equipment transporting nuclear fuel or spent nuclear fuel, or to the nuclear fuel or spent nuclear fuel a facility or carrier possesses; or (c) Interruption of normal operation of a licensed nuclear power reactor through the unauthorized use of or tampering with its machinery, components, or controls including the security system. (ii) An actual entry of an unauthorized person into a protected area, material access area, controlled access area, vital area, or transport. (iii) Any failure, degradation, or the discovered vulnerability in a safeguard system that could allow unauthorized or undetected access to a protected area, material access area, controlled access area, vital area, or transport for which compensatory measures have not been employed. (iv) The actual or attempted introduction of contraband into a protected area, material access area, vital area, or transport. 	10 CFR 73 Appendix G	