

<b>ISFSI PERFORMANCE INDICATOR PROGRAM</b>	Identifier: MCP-3182
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INTEC	Management Control Procedure	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 01/05/10
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Manual: INTEC NRC

**USE TYPE 3**Change Number: 328679

\*The current revision can be verified on EDMS.

## 1. PURPOSE

Provide instructions for monitoring, trending, and reporting performance indicators (PIs) applicable to the Fort St. Vrain (FSV) and Three Mile Island Unit 2 (TMI-2) Independent Spent Fuel Storage Installations (ISFSI), and the Idaho Spent Fuel Facility (ISFF).

## 2. SCOPE

### 2.1 Performance Indicators

The following PIs are required by the Technical Specifications (TSs) or Safety Analysis Reports (SARs) and/or are determined to be significant to the management of Nuclear Safety at Nuclear Regulatory Commission (NRC) licensed ISFSIs:

- A. Audit findings (TMI and FSV TS 5.2.1.4a, ISFF SAR 9.1.3.1.1)
- B. Reportable events and conditions (TMI and FSV TS 5.2.1.4a, ISFF SAR 9.1.3.1.1)
- C. TS violations (TMI and FSV TS 5.2.1.4a, ISFF SAR 9.1.3.1.1)
- D. Worker exposure (FSV SAR 7.1.1.3)
- E. Personnel contamination (FSV SAR 7.1.1.3)
- F. Waste generation (FSV SAR 7.1.1.3)
- G. Area contamination (FSV SAR 7.1.1.3).

### 2.2 Operations Performance Areas

Conduct of Operations procedure MCP-2973, “Chapter I—Operations Organization and Administration,” Section 3.3, requires establishing Performance Goals. A list of suggested goals is provided in MCP-2973, Section 4.1.7.

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### 3. RESPONSIBILITIES/PREREQUISITES

#### 3.1 Responsibilities

Performer	Responsibilities
ISFSI Manager	Maintain the PI Program to implement requirements identified in the Procedure Basis Document.
Facility Safety Officer (FSO)	Implement the PI Program

### 4. INSTRUCTIONS

- 4.1 ISFSI Manager: Establish performance goals for areas specified in Step 2.1 above and other areas as appropriate.
- 4.2 FSO or Designee: Collect Performance Indicator data.
- 4.3 FSO or Designee: Analyze the Performance Indicator data for trends and/or other indications.

**NOTE:** *PI Reports are prepared semi-annually typically in April and October for the preceding six months.*

- 4.4 FSO or Designee: Prepare the PI Reports and submit reports to the ISFSI Manager.
- 4.5 ISFSI Manager: Review/approve PI Reports and distribute reports in accordance with Step 5.
- 4.6 ISFSI Manager: Review PI Reports and performance goals for trends and significant changes. Initiate corrective actions as necessary.

### 5. RECORDS

Copies of the approved PI Report are distributed to the following:

- A. ISFSI Safety Review Committee Chair
- B. INTEC As Low as Reasonably Achievable (ALARA) Committee Chair.

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Records generated as a result of this procedure, which include the following, are maintained in accordance with MCP-557.

Documentation of performance goals established by Step 4.1

PI Reports

**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.*

**6. DEFINITIONS**

None

**7. REFERENCES**

Fort St. Vrain Independent Spent Fuel Storage Installation SAR, Section 7.1, “Ensuring that Occupational Radiation Exposures Are As Low As Reasonably Achievable (ALARA).”

Fort St. Vrain TS 5.2.1.4 A

MCP-2973, “Chapter I—Operations Organization and Administration”

TMI TS 5.2.1.4 A

Idaho Spent Fuel Facility SAR, Section 9.1.3.1.1, “ISFSI Safety Review Committee”

**8. APPENDIXES**

Appendix A, Procedure Basis

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**Appendix A**

**Procedure Basis**

Step	Basis	Source	Citation
All	In order to maintain personnel exposures low, an ALARA Program will be implemented that includes, trending of radiological performance factors including worker exposures, personnel contamination, waste generation, and area contamination.	FSV ISFSI, SAR, Section 7.1.1.3.	
All	The Safety Review Committee must provide oversight of ISFSI operation by performing reviews of PI (audit findings, reportable events and conditions, TS violations.)	FSV ISFSI TS 5.2.1.4 a, TMI-2 ISFSI TS 5.2.1.4 a, and ISFF SAR, Section 9.1.3.1.1	
All	Implement trending of radiological performance factors including worker exposures, personnel contamination, waste generation, and area contamination.	FSV ISFSI SAR Section 7.1.1.3.	
All	Written procedures must be established, implemented, and maintained for administrative controls.	TS 5.4.1.a	
2.2, 4.6	Conduct of Operations procedure MCP-2973, “Chapter I—Operations Organization and Administration,” Section 4.1.7, requires establishing Performance Goals.	MCP-2973, Section 4.1.7	