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INTEC	Management Control Procedure	For Additional Info: http://EDMS	Effective Date: 12/14/11
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Manual: INTEC NRC

USE TYPE 3

Change Number: 334887

*The current revision can be verified on EDMS.

1. PURPOSE

To describe the process for placing and maintaining postings required by the Nuclear Regulatory Commission (NRC).

2. SCOPE

This procedure applies to Department of Energy (DOE) owned spent fuel storage facilities that are licensed by NRC under 10 CFR Part 72, “Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste” and operated for DOE by the Idaho Cleanup Project contractor at the Idaho National Laboratory.

3. RESPONSIBILITIES/PREREQUISITES

Performer	Responsibilities
ISFSI Manager	Identify appropriate posting locations. Maintain required postings at ISFSIs.
Regulatory Compliance	Maintain a list of required posting locations. Periodically perform a surveillance of posting locations to verify postings. Update documents containing the information required to be posted. Review Notices of Violation and determine whether such notices require posting.

4. INSTRUCTIONS

NOTE: *Postings at locations other than those identified in Appendix A are discouraged because maintenance of these postings is not assured. However, such additional postings cannot be practically prohibited because well-intentioned individuals may be inclined to make personal copies.*

- 4.1 ISFSI Manager: As necessary, notify Regulatory Compliance of locations of postings at specific facilities to reflect licensed activity locations or the work locations of *protected employees* (see def.).

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- 4.2 Regulatory Compliance: Maintain a list of all required posting locations. Periodically perform a surveillance to ensure the postings are complete and where they are listed.
- 4.3 As necessary, ensure that NRC Form 3 and the Document Availability Notice (Form 431.50 or 431.50A) and other postings are current and in good physical condition.
- 4.4 Distribute new revisions to NRC Form 3 and the Document Availability Notice to the ISFSI Managers for posting.
- 4.5 Distribute notices of violation (NOV) involving radiological conditions, proposed imposition of civil penalty, order issued pursuant to subpart B of 10 CFR Part 2, and any response from the licensee DOE-ID) to the appropriate ISFSI Manager(s) for posting.
- 4.6 ISFSI Managers: Post documents from Step 4.5, within two working days after receipt of the documents from the NRC or DOE, for a minimum of five working days or until action correcting the violation has been completed, whichever is later.

5. RECORDS

None

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

Protected Employees. Radiological workers and other employees who could be reasonably expected to engage in protected activities as defined in 10 CFR 72.10(a).

Although the activities described in 10 CFR 72.10(a) are not expected, personnel assigned to routinely perform the following work for an ISFSI should be considered to be personnel who could engage in protected activities:

- Any work within an ISFSI
- Develop or maintain safety analyses
- Maintain physical protection
- Maintain emergency preparedness

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- Maintain radiological control (including radiological environmental monitoring)
- Assure quality of items important to safety.

7. APPENDIXES

Appendix A, Posting Locations

Appendix B, Procedure Basis

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Appendix A**Posting Locations****Posting Locations (Maintained by FSV ISFSI Manager):**

- FSV Administration Building

Posting Locations (Maintained by TMI-2 ISFSI Manager):

- Entrance to CPP-1774
- Entrance to INTEC

Posting Locations (Maintained by ISFF Manager):

- ISFSI Management Office Area
- Main entrances to office buildings housing personnel engaged in licensed activities

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Appendix B

Procedure Basis

Step	Basis	Source	Citation
Entire procedure	Written procedures shall be established, implemented, and maintained for administrative controls.	TS 5.4.1.a	
4.1, App. A	Documents, notices, or forms shall be conspicuously posted in a sufficient number of places to permit individuals engaged in licensed activities to observe them on the way to or from any particular licensed activity location or their place of work.	10 CFR	19.11 (d) 72.10(e)(1)
1.1	Documents, notices, or forms shall be conspicuous, and shall be replaced if defaced or altered.	10 CFR	19.11(d)
4.3, 4.4, and Forms 431.50 and 431.50A	Each licensee shall post current copies of the following documents: [several documents required that are either included in the postings or described pursuant to 19.11(b)].	10 CFR	19.11(a), (b), (c) 21.6
4.4	Commission documents posted pursuant to paragraph (a)(4) of this section shall be posted within 2 working days after receipt of the documents from the Commission; the licensee’s response, if any, shall be posted within 2 working days after dispatch by the licensee. Such documents shall remain posted for a minimum of 5 working days or until action correcting the violation has been completed, whichever is later.	10 CFR	19.11(e)