

## List

# Conduct of Operations Conformance Matrix (NRC Regulated Facilities)

**Idaho  
Cleanup  
Project**

The Idaho Cleanup Project is operated for the  
U.S. Department of Energy by CH2M ♦ WG Idaho, LLC

<b>CONDUCT OF OPERATIONS CONFORMANCE MATRIX (NRC REGULATED FACILITIES)</b>	Identifier: LST-24 Revision*: 7 Page: 1 of 18
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INTEC	List	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 10/01/09
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Manual: 9 INTEC

Change Number: 327397

\*The current revision can be verified on EDMS.

## FOREWORD

The following document is the Fort St. Vrain (FSV) and the Three Mile Island Unit 2 (TMI-2) Independent Spent Fuel Storage Installation (ISFSI) Conduct of Operations Conformance Matrix. This matrix identifies the conduct of operations procedures used for operations at FSV and TMI-2 to maintain consistency in the way operations are conducted at the ICP facilities. The procedures identified in this matrix along with the matrix itself, are the conduct of operations program for FSV and TMI-2. Procedures and other documents in manual 9 not identified in this matrix are not applicable to the NRC regulated facilities. FSV and TMI-2 are NRC regulated facilities and as such are subject to NRC requirements. NUREG-1567 “Standard Review Plan for Spent Fuel Dry Storage Facilities,” Section 10.5, emphasizes the following areas of conduct of operations under normal operations:

- Procedures
- Records
- Personnel Selection, Training and Certification
- Emergency Planning
- Physical Security and Safeguards Contingency Plans

The emergency plans, physical protection plans, and training plans associated with the ISFSIs are license basis documents and as such are approved by the NRC. Requirements of the NRC approved documents supersede requirements of the conduct of operations Manual 9 if conflicts exist. DOE-5480.19 does not apply to the FSV and TMI-2 ISFSI but is used as a guideline for this matrix to maintain consistency between the NRC regulated facilities matrix and other ICP matrices. As such, DOE approval of this matrix is not required. The matrix identifies: 1) by chapter, section, and subsection the supporting company and/or facility specific procedures, 2) the applicability of each chapter, section or subsection to operations at the FSV and TMI-2 ISFSI. The matrix applies only to personnel involved in operations directed activities such as: operators (fuel handlers); technical leads; engineers involved in operations activities; radiological control technicians; operations trainers; quality inspectors; and their line management. The FSV ISFSI and TMI ISFSI are primarily single shift operations with a small contingent of personnel who provide facility oversight and daily support. Some sections of the conduct of operations procedures and supplemental procedures are not always applicable. For example, shift turnover will only apply when operations dictate that multiple shifts are required to perform an operation.

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			TMI	FSV	Common
<b>CHAPTER I - OPERATIONS ORGANIZATION AND ADMINISTRATION</b>					
<b>I.C.1 Operations Policies</b>	Yes	Policies for operations are in place for the ISFSIs. Physical security and policies for the ISFSIs are in accordance with the security plan for the individual ISFSI.	MCP-3773	MCP-325	MCP-2973
<b>I.C.2 Resources</b>	Yes	ISFSI resources are controlled and managed by contract and the ICP Contractor for current and long-range staffing in accordance with established procedures and policies.			MCP-2973 PDD-8 PRD-319
<b>I.C.3 Monitoring of Operating Performance</b>	Yes	ISFSI operating performance is monitored and tracked by the Integrated Safety Management System (ISMS) and Issue Communication and Resolution Environment (ICARE). Reportable incidents, investigations and critiques are handled by the INTEC Plant Shift Supervisors (TMI only). ISFSI performance indicator and trending implemented and tracked by MCP-3182.			MCP-2973 MCP-3182
<b>I.C.4 Accountability</b>	Yes	ISFSI performs performance monitoring and accountability assessments. Violations of operating practices, counseling and discipline are performed in accordance with labor agreements, contract and policy by the ICP Contractor versus ISFSI Supervision.			MCP-2973 PRD-319

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<b>I.C.5 Management Training</b>	Yes	Formalized training programs exist for specific aspects of ISFSI management. ISFSI training requirements are assigned, tracked and performed by the Training Department and recorded in the TRAIN database in accordance with Program Description and procedures.			MCP-2973 MCP-3043 PDD-8
<b>I.C.6 Planning for Safety</b>	Yes	ISFSI activities are performed in accordance with approved procedures that have been analyzed for hazards and safety. Maintenance tasks are performed in accordance with the established Work Order system which includes safety and hazards analysis (TMI only).			MCP-2973 MCP-3562 PRD-317 STD-101
<b>CHAPTER II – SHIFT ROUTINES AND OPERATING PRACTICES</b>					
<b>II.C.1 Status Practices</b>	Yes	Facility Managers, Manager of ISFSI Management and the Facility Director are kept aware of facility status and changes.			MCP-2974
<b>II.C.2 Safety Practices</b>	Yes	ISFSI operations are performed in accordance with safety analyses and hazards assessments.			MCP-2974
<b>II.C.3 Operator Inspection Tours</b>	No	ISFSI operations do not require routine operator facility inspection and tours. When ISFSI operations occur, they are short-term evolutions controlled, documented and directed by procedure.			N/A

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II.C.4 Round / Tour Inspection Sheets	No	ISFSI operations do not require facility inspection and tours. Routine surveillances and maintenance items are performed by procedure in accordance with Technical Specification Requirements (TSR) and the appropriate Safety Analysis Report (SAR).			N/A
II.C.5 Personnel Protection	Yes	ISFSI chemical and toxic materials awareness is in accordance with ICP Hazards Communications and Chemical Control process. Rad Worker qualifications are maintained and ALARA practices implemented by workers and line management.			MCP-2974 PRD-317 PRD-319
II.C.6 Response to Indications	No	ISFSI operation areas do not have alarm panels, instruments, or valve indications.			N/A
II.C.7 Resetting Protective Devices	Yes	Protective devices support the normal mission of the facilities. Trips are investigated and resolved commensurate with the tripped device or affected system, but not to the level of detail intended in this section of the Order. Specific tasks will have trips and resets performed in accordance with supervision and the procedure in use for that task.			MCP-2974 POL-121
II.C.8 Load Changes	No	The mission of the facilities does not perform "load changes" as described in the Order.			N/A

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<b>II.C.9 Authority to Operate Equipment</b>	Yes	The authority to operate equipment for transfers and other operations toward repackaging, storage and shipping is clearly defined by ISFSI operations management and does not originate with an operations supervisor as intended in this section of the Order. Those evolutions are also controlled by approved procedures, work orders, Plan of the Day (POD) or Plan of the Week (POW) that specify authorities to operate.	INTEC Plan of Day (POD) & Plan of Week (POW)	FSV POD & POW	MCP-2974
<b>II.C.10 Shift Operating Bases</b>	No	ISFSI activities do not support an assigned shift operating base as intended in this section of the Order. ISFSI management maintains the documentation and processes associated with an operating base for ISFSI operations.			N/A
<b>II.C.11 Potentially Distractive Written Material and Devices</b>	Yes	Potentially distractive materials or devices are prohibited within ISFSI administratively controlled areas in accordance with overall management expectation and guidance. Management policy does allow non-work related materials during breaks and in non-working areas while “on-duty.”			MCP-2974

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<b>CHAPTER III – CONTROL AREA ACTIVITIES FOR DOE FACILITIES</b>					
<b>III.C.1 Control Area Access</b>	Yes	ISFSI does not maintain continuous Control Rooms or At the Controls areas as intended in this section of the Order. Temporary Control Areas and At the Controls may be assigned by the Operations Supervisor for limited short-term operations in accordance with procedures and work tasks. Access controls are maintained and implemented by ISFSI security procedures and protocols.	MCP-3773	MCP-325	MCP-2975
<b>III.C.2 Professional Behavior</b>	Yes	ISFSI does not maintain continuous Control Rooms or At the Controls areas as intended in this section of the Order. Professional behavior is maintained in the administratively controlled areas and in Control Areas and At the Controls areas in accordance with management expectations and policy.			MCP-2975
<b>III.C.3 Monitoring the Main Control Panels</b>	No	ISFSI operations do not require constant monitoring of control panels during shift. Control Areas and At the Controls areas may be temporarily assigned for specific short-term tasks, the level of operations is performed in accordance with procedure directions.			N/A

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III.C.4 Control Operator Ancillary Duties	No	Normal ISFSI operating controls and panels do not require constant attention in the current mission of the facilities, ancillary duties do not interfere. Any specific short-term operational task performed by procedure will have no ancillary duties that might prevent its effective performance.			N/A
III.C.5 Operation of Control Area Equipment	Yes	ISFSI normal operations do not have Control Rooms or At the Controls areas as intended in this section of the Order. Operation of the equipment to support the facility mission is limited to trained, qualified and specified ISFSI personnel in accordance with approved procedures. Specific short-term tasks have operator qualification requirements established and maintained in accordance with procedures and programs for those operations.			MCP-2975
<b>CHAPTER IV - COMMUNICATIONS</b>					
IV.C.1 Emergency Communications Systems	No	Any emergency communications related to ISFSI facilities will either be handled by security and shift management at the INTEC for TMI or the security force at FSV. Neither ISFSI installation has emergency notification systems as intended in this section of the Order.			N/A
IV.C.2 Public Address System	No	ISFSI does not have internal public address systems in either facility as intended in this section of the Order.			N/A

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<b>IV.C.3 Contacting Operators</b>	Yes	ISFSI does establish short-term control areas for specific tasks and operator communications are established and maintained commensurate with the task or evolution. Measures are taken for communicating with maintenance or operational personnel in known high ambient noise areas as the situation warrants.			MCP-2976
<b>IV.C.4 Radios</b>	Yes (FSV) No (TMI)	FSV ISFSI personnel and line supervisors have radio communications systems which are used when required. TMI ISFSI operations do not use or require radios.	N/A	MCP-2976	
<b>IV.C.5 Abbreviations and Acronyms</b>	Yes	There is no formal and approved list of acronyms as intended in this section of the Order. Acronyms are standardized and generic to ICP operations by policy and available in an on-line listing.			Online Listing MCP-2976
<b>IV.C.6 Oral Instructions and Informational Communications</b>	Yes	ISFSI oral instructions and communications for normal operations are not at the level of detail intended in this section of the Order. Oral instructions are repeated and verified in accordance with the nature of the evolution and level of hazard involved.			MCP-2976
<b>CHAPTER V – CONTROL OF ON-SHIFT TRAINING</b>					
<b>V.C.1 Adherence to Training Programs</b>	Yes	ISFSI personnel are trained and adhere to a program established and maintained by the ICP Training Department and the TRAIN database.			MCP-2977 PDD-8 MCP-3043

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			TMI	FSV	Common
<b>V.C.2 On-Shift Instructor Qualifications</b>	Yes	A qualified instructor is assigned as required by supervision.			MCP-2977 PDD-8 MCP-3043
<b>V.C.3 Qualified Operator Supervision and Control of Trainees</b>	Yes	Qualified on-shift instructors perform on-shift training with observation and control of trainees maintained.			MCP-2977 PDD-8 MCP-3043
<b>V.C.4 Operator Qualification Program Approval</b>	Yes	ISFSI has an established qualification program. ISFSI Manager approves the lesson plans and qualification cards for the ISFSI in accordance with the applicable SAR, as required. ISFSI Department Manager is owner of the MCP-3043 training program.			MCP-2977 PDD-8 MCP-3043
<b>V.C.5 Training Documentation</b>	Yes	All ISFSI training and qualification records are maintained by the Training Department and within the TRAIN database.			MCP-2977 PDD-8 MCP-3043
<b>V.C.6 Suspension of Training</b>	Yes	On-shift training will be suspended if required in accordance with the Order.			MCP-2977 PDD-8 MCP-3043
<b>V.C.7 Maximum Number of Trainees</b>	Yes	There is no formal maximum number of trainees or trainee-to-instructor ratio as intended in this section of the Order, most training is one-on-one. ISFSI Technical Leads will control when training occurs and the on-shift instructor/student ratio for on-shift training.			MCP-2977 PDD-8 MCP-3043

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<b>CHAPTER VI – INVESTIGATION OF ABNORMAL EVENTS</b>					
Chapter VI applies to ISFSI operations.	Yes	ISFSI supervision and personnel will only notify Management, provide data and appear for investigations and critiques. All abnormal events and Occurrence Reporting and Processing System (ORPS) reportable events are investigated, processed, critiqued and documented in accordance with MCP-190. Incident reporting is also performed in accordance with MCP-2924, “NRC Licensee Event & Condition Reporting” and MCP-2928, “10 CFR 21 Evaluations & Reports.”			MCP-190 MCP-2924 MCP-2928
<b>CHAPTER VII - NOTIFICATIONS</b>					
Chapter VII applies to ISFSI operations.	Yes	Required notifications are performed by the ISFSI Managers in accordance with procedures. Communications equipment is maintained in the Emergency Operations Center by Emergency Management.			MCP-190 MCP-2924 MCP-2928
<b>CHAPTER VIII – CONTROL OF EQUIPMENT AND SYSTEMS STATUS</b>					
<b>VIII.C.1 Status Change Authorization and Reporting</b>	Yes	The Facility Managers maintain facility status and authorize changes. Operations will be fully briefed and performed by trained personnel in accordance with procedures and an approved Plan of the Week.			MCP-2978

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			TMI	FSV	Common
VIII.C.2 Equipment and System Alignment	Yes (FSV) No (TMI)	Equipment and system alignments for ISFSI do not meet the complexity intended in this section of the Order. Equipment and system alignments are maintained for the mission of the facility in accordance with approved procedures and the work control system. There is no equipment or system that this requirement fits at TMI that are controlled by operations.			MCP-2978
VIII.C.3 Equipment Locking and Tagging	Yes	Administrative locking and tagging is accomplished in accordance with program and procedures, if required.			MCP-2978
VIII.C.4 Operational Limits Compliance	Yes	Facility Managers, Operations Supervisors, Line Managers and watchstanders are aware of the operational limits still applicable to the facilities derived from the Safety Bases and defined in operating procedures.			MCP-2978
VIII.C.5 Equipment Deficiency Identification and Documentation	Yes	Equipment deficiencies are recorded and documented, however, not all deficiencies will be scheduled for correction due to the life cycle and mission of the facilities.			MCP-2978
VIII.C.6 Work Authorization and Documentation	Yes	Work authorizations and release for work is accomplished through and are listed for the planned evolutions in an approved Plan of the Day (POD) or Plan of the Week (POW).	INTEC POD & POW	FSV POD & POW	MCP-2978 PDD-1005 MCP-3562 STD-101

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<b>VIII.C.7 Equipment Post-Maintenance Testing and Return to Service</b>	Yes (FSV) No (TMI)	Equipment post-maintenance testing and return to service is accomplished applicable procedures and meets requirements in accordance with the appropriate TSR for the system or facility. There is no equipment or system that this requirement fits at TMI that are controlled by operations.			MCP-2978
<b>VIII.C.8 Alarm Status</b>	No	There are no alarms monitored for the current mission or TSRs of the facilities.			N/A
<b>VIII.C.9 Temporary Modification Control</b>	Yes	The detail and complexity intended in this section of the Order is not maintained for temporary modifications in the current mission of the ISFSI facilities. Temporary modifications are documented and controlled by ISFSI procedures and the work order process.			MCP-2978 MCP-2811 MCP-2925
<b>VIII.C.10 Distribution and Control of Equipment and System Documents</b>	Yes	ISFSI facility and operating documents are controlled, but not all engineering drawings and specifications are maintained up to date. Facility and operating documents are controlled by the Electronic Document Management System (EDMS). Document changes are submitted to Document Control and the updated revision is then uploaded to EDMS.			MCP-2978

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			TMI	FSV	Common
<b>CHAPTER IX – LOCKOUTS AND TAGOUTS</b>					
<b>IX.C.1 Lockout / Tagout Use</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.2 Lockout and Tagout Implementation</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.3 Protective Materials and Hardware</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.4 Lockout Tagout Program</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.5 Procedures for Lockout Tagout</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	

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			TMI	FSV	Common
<b>IX.C.6 Application of Lockout Tagout</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.7 Testing or Positioning of Equipment or Components</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.8 Periodic Inspections</b>	Yes (FSV) No (TMI)	ISFSI maintains a periodic inspection/assessment program in accordance with approved procedures. Not all periodic assessments are performed by ISFSI personnel.	N/A	MCP-3651 PRD-5051	
<b>IX.C.9 Caution Tags</b>	Yes (FSV) No (TMI)	Caution Tags are implemented and controlled by program and procedure for FSV ISFSI.	N/A	MCP-2978 PRD-5051	
<b>IX.C.10 Training and Communication</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	

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			TMI	FSV	Common
<b>IX.C.11 Lockout or Tagout Implementation</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.12 Notification of Personnel</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.13 Outside Contractors</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.14 Group Lockouts or Tagouts</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	
<b>IX.C.15 Shift or Personnel Changes</b>	Yes (FSV) No (TMI)	Lockout/Tagout is implemented and controlled by program and procedure for the FSV ISFSI. Any lockout/tagout required for TMI ISFSI operations will be provided by the support group performing the operation.	N/A	MCP-3651 PRD-5051	

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			TMI	FSV	Common
<b>CHAPTER X – INDEPENDENT VERIFICATION</b>					
<b>X.C.1 Components Requiring Independent Verification</b>	Yes	Evolutions involving components that require independent verification will be associated with specific approved procedures or programs.			MCP-2979
<b>X.C.2 Occasions Requiring Independent Verification</b>	Yes	ISFSI operations do not meet the complexity intended in this section of the Order for independent verification. Occasions requiring independent verification will have those specified in the approved procedure or program for that evolution.			MCP-2979
<b>X.C.3 Verification Techniques</b>	Yes	The detail intended in this section of the Order for verification techniques does not entirely apply to ISFSI. Training is provided to ISFSI operations personnel on verification techniques and types.			MCP-2979
<b>CHAPTER XI - LOGKEEPING</b>					
<b>XI.C.1 Establishment of Operating Logs</b>	Yes	Logs are kept for the facilities.			MCP-2980
<b>XI.C.2 Timeliness of Recordings</b>	Yes	Logs are kept for the facilities and are completed in a designated and timely fashion.			MCP-2980
<b>XI.C.3 Information to be Recorded</b>	Yes	Logs are kept for the facilities. Logs are kept in accordance with approved procedures and guidance. Logs are reviewed as required.			MCP-2980
<b>XI.C.4 Legibility</b>	Yes	Logs are kept for the facilities and legibility requirements are expected and maintained by line supervision.			MCP-2980
<b>XI.C.5 Corrections</b>	Yes	Logs are kept for the facilities and correction requirements are expected and maintained by line supervision.			MCP-2980

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			TMI	FSV	Common
<b>XI.C.6 Log Review</b>	Yes	Logs are kept for the facilities and reviewed by line supervision.			MCP-2980
<b>XI.C.7 Care and Keeping of Logs</b>	Yes	Logs are kept for the facilities and maintained by line supervision.			MCP-2980
<b>CHAPTER XII – OPERATIONS TURNOVER</b>					
Chapter XII does not apply to ISFSI operations.	No	Both ISFSI are day shift only operations. ISFSI operations do not require nor perform operations turnover as intended in this section of the Order.			N/A
<b>CHAPTER XIII – OPERATIONS ASPECTS OF FACILITY CHEMISTRY AND UNIQUE PROCESSES</b>					
Chapter XIII does not apply to ISFSI operations.	No	There are no facility or chemistry unique processes in ISFSI operations as intended by this chapter of the Order. System process parameters are defined in the operator log.			N/A
<b>CHAPTER XIV – REQUIRED READING</b>					
Chapter XIV applies to ISFSI operations.	Yes	Some required reading is maintained and tracked by the site training department under the TRAIN database. Any pertinent ISFSI required reading will be handled by the facility Managers under current procedural directions.			MCP-2983
<b>CHAPTER XV – TIMELY ORDERS TO OPERATORS</b>					
Chapter XV does not apply to ISFSI operations.	No	There are no timely orders required in ISFSI operations as intended in this section of the Order. Long term orders are implemented by Management when required.			N/A

<b>CONDUCT OF OPERATIONS CONFORMANCE MATRIX (NRC REGULATED FACILITIES)</b>	Identifier: LST-24 Revision: * 7 Page: 18 of 18
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DOE ORDER 5480.19 ATTACHMENT 1 GUIDELINE	APPLICABILITY (YES/NO)	BASIS FOR APPLICABILITY OR DEVIATION	IMPLEMENTING DOCUMENTS		
			TMI	FSV	Common
<b>CHAPTER XVI – OPERATIONS PROCEDURES</b>					
Chapter XVI applies to ISFSI operations.	Yes	ISFSI procedures are developed, controlled, revised and maintained by program and procedure.			MCP-2985 MCP-135
<b>CHAPTER XVII – OPERATOR AID POSTINGS</b>					
Chapter XVII applies to ISFSI operations.	Yes	Operator Aids are developed, approved, posted and maintained in accordance with ISFSI procedure and in compliance with the Order, when and where required.			MCP-2986
<b>CHAPTER XVIII – EQUIPMENT AND PIPING LABELING</b>					
Chapter XVII applies to ISFSI operations.	Yes	Active systems and components are labeled in accordance with the function and required operations of the systems. Labeling is applied and maintained commensurate with the current life-cycle, mission and hazard associated with the facility and to the extent necessary to maintain safe system and facility operation. Out of service, abandoned or equipment scheduled for demolition will be marked as necessary for identification and recognition.			MCP-2987