

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 73051

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### INSERVICE INSPECTION - REVIEW OF PROGRAM

PROGRAM APPLICABILITY: 2512, 2515 (BASIC)

#### 73051-01 INSPECTION OBJECTIVE

Ascertain whether the licensee's program pertaining to the Preservice Inspection (PSI) and Inservice Inspection (ISI) is complete and in conformance with regulatory requirements and the licensee's commitments.

#### 73051-02 INSPECTION REQUIREMENTS

02.01 Program Approval. Ascertain that the following requirements are met:

- a. ISI program, including examinations and tests, is in conformance with relevant ASME Code Section XI editions and addenda, and Code cases proposed for use as part of the plan. Verify that any relief from Code requirements has been approved by NRR.
- b. The services of an Authorized Nuclear Inservice Inspector (ANII) have been procured and the ISI plan has been reviewed by the ANII in accordance with Article IWA-2120 of the ASME Code.
- c. The ISI plan has been reviewed by the licensee's site nuclear safety review committee, or equivalent licensee review and approval has been documented.

02.02 Program Organization. Ascertain whether the following items are included in the ISI program:

- a. Identification of all licensee commitments and regulatory requirements pertinent to ISI testing and monitoring.
- b. Means of preparing plans and schedules and filing them with enforcement and regulatory authorities having jurisdiction at the facility.

- c. Sufficient organizational staff, both in number and training, to ensure that acceptable ISI work is performed.
- d. Site administrative procedures are in place to define the authority and responsibilities of the persons or organizations involved with the final evaluation and acceptance of ISI results for the licensee.

02.03 Quality Assurance Program. Review the licensee's and ISI contractor's quality assurance programs to verify the following items are included:

- a. Procedures for the maintenance of required ISI records.
- b. QA review includes assurance that plans and procedures have been reviewed by appropriate personnel and meet regulatory requirements.
- c. Procedures are established for the corrective action of conditions adverse to quality as detected during examination, including provisions to preclude repetition of such adverse conditions.
- d. Audits or surveillances of ISI activities are conducted by qualified QA personnel to verify compliance with the ISI program.
- e. Procedures are established to effectively oversee contractor activities concerned with ISI/PSI.

02.04 Repair Program. Review the licensee's administrative and maintenance procedures to verify that the requirements of Article IWA-4000 of the ASME Code, and NRC supplementary requirements, are included or referenced.

02.05 Replacement Program. Review the licensee's administrative and maintenance procedures to verify that requirements of Article IWA-7000 of the ASME Code, and NRC supplementary requirements, are included or referenced.

02.06 Records. Ascertain that provisions for the maintenance and retention of records, including inspection, examination, test reports, repair and replacement, QA, and NDE records have been established in the ISI program.

02.07 Qualification of Personnel. Ascertain whether the program specifies personnel qualification requirements consistent with the ASME Code, plant Technical Specifications (TS), and other applicable documents.

02.08 Reporting Requirements. Verify that the licensee's program includes the ASME Code and plant TS requirements for submittal of written reports of ISI results, repairs, and replacements.

02.09 Relief Requests. Verify that the licensee's program contains guidance regarding the identification and processing of requests for relief from ASME Code requirements. Conduct a walkdown inspection or an ISI data review, as appropriate, to verify that the bases for the relief requested are valid and accurate.

73051-03 INSPECTION GUIDANCE

General Guidance. The review of the licensee's program is to be conducted for the PSI of each unit and for the first ISI of each unit. Subsequent reviews shall be conducted every other outage and should key only on program changes. The inspection frequency should be increased if the licensee receives a Category 3 SALP rating in the "outage" functional area. Additionally, a review of the licensee's program shall be conducted upon submittal of the program document to the NRC at the prescribed 10-year interval.

This procedure covers ASME Section XI with the exception of those items in the PSI program that are covered in the Preoperational Test Program, Chapter 7000 of the IE Manual.

For the purpose of this inspection procedure, the term, "ISI program," includes the ISI plan and the administrative, technical, and quality assurance programs required to implement the plan.

### 03.01 Specific Guidance.

- a. Inspection Requirement 02.01. Pursuant to 10 CFR 50.55a(g), the licensee periodically submits an updated ISI program to the NRC for review and approval. Requirements delineated in this program are regulatory requirements as are the TS. In the event of conflict between the TS and 10 CFR 50.55a(g), the regulatory position is that of the more stringent requirement. Exceptions to or deviations from testing requirements shall be consistent with those permitted by the ISI program approved by the NRC.
  
- b. Inspection Requirement 02.02. The PSI/ISI program requirements differ for each facility. Each facility will have submitted an ISI plan to the NRC and often have been granted relief from certain requirements. The inspector should contact the licensing project manager for the site to determine the status of any relief requests for TS changes involving PSI/ISI activities. The inspector should develop a list of requirements and commitments involving ISI and determine if the licensee's program provides a means of tracking requirements and commitments. ANSI N45.2.6, "Qualification of Inspection, Examination, and Testing Personnel" and RG 1.58, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel" provide guidance to ensure that commitments to qualifications of organizational staff are met.

The inspector should also be aware of NRC/industry initiatives in the area of qualification of procedures and personnel for ISI.

- c. Inspection Requirement 02.03. PSI and ISI activities are subject to QA audit, monitor, surveillance, and QC inspection. The licensee's QA Manual and (if applicable) contractor's QA Manual should cover all PSI and ISI activities.

The QA program must be documented in accordance with 10 CFR 50 or ANSI/ASME NQA-1-1979, "Quality Assurance Program Requirements for Nuclear Facilities, Parts II and III."

- d. Inspection Requirement 02.04. Detailed requirements for repair programs are specified in Article IWA-4000 of the ASME Code. Repairs should be performed in accordance with the licensee's design specifications and the Construction Code of the component or systems to be repaired. Later editions of the Construction Code or Section III may be used. If repair welding cannot be performed in accordance with these requirements, the following may be used:

1. IWB - 4000 for class 1 components
2. IWC - 4000 for class 2 components
3. IWD - 4000 for class 3 components
4. IWE - 4000 for class MC components

Proper justification is essential for deviations from, or exceptions to, codes and standards.

Individual repair projects differ widely, so the licensee's pre-established program must recognize this. The program should address the various aspects of repair work and require that explicit procedures be developed, reviewed, approved, and implemented to accomplish the specific project.

- e. Inspection Requirement 02.06. As required by Section XI, the licensee prepares records of inservice inspection. The standard FSAR and standard TS specify record retention periods, and ANSI N45.2.9 provides specific guidance on retention periods and design features for a permanent record storage facility. It is not necessary that all PSI and ISI records be stored onsite. Special concern should be given to the acquisition and proper storage of PSI records for the PSI performed by the manufacturer. The licensee's program for the evaluation of indications found during ISI should include the requirement that the inspection results be compared to the last ISI or the PSI results.
- f. Inspection Requirement 02.09. Requests for relief based on component inaccessibility should be verified by performing a walkdown inspection of the item for which relief was requested. For requests based on other limitations to inspection, a review of existing NDE data should be performed. Also, during PSI program reviews, the inspector should verify that the relief requests do not involve matters that are rejectable under the original system building code (i.e., ASME Code Section III).

#### 73051-04 REFERENCES

ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."

ANSI N45.2.6, "Qualification of Inspection, Examination, and Test Personnel."

Society for Nondestructive Testing, "Recommended Practice No. SNT-TC-1A."

ANSI N45.2.9., "Requirements for Collection, Storage, and Maintenance of QA Records."

Regulatory Guide 1.58, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel."

ANSI NQA-1-1979, "Quality Assurance Program Requirements for Nuclear Facilities, Parts II and III."

Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1."

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