

**From:** Thomas Bergman  
**To:** Alan Levin  
**Date:** Mon, Mar 25, 2002 2:47 PM  
**Subject:** RE: Question about Construction Inspection Program

Al, I believe the attached responds to your questions to NRLPO on ITAAC.

Please let me know if there is anything else we can provide.

thanks

Q/29

## Pre-COL ITAAC

We recognize the problem regarding the need to perform inspections of components that may be fabricated before issuance of the combined license, which would include the approved ITAAC. This issue was identified in SECY-01-0188, "Future Licensing and Readiness Assessment (FLIRA) Report." The construction inspection team that was formed is trying to determine the best course of action for the problem. The risk of starting offsite construction activities without the benefit of an approved set of ITAAC has also been pointed out to Exelon. Below is some background regarding this problem.

A draft revision to the construction inspection program that was done in 1996 recommended that the construction inspection team be formed as soon as we receive a COL application. The report assumed that a COL applicant would be referencing a certified design. The idea was to start working with the applicant as soon as possible to schedule ITAAC. It was recognized that offsite activities like large component manufacturing would require offsite inspections. In addition, offsite manufacturing of portions of the plant, modules, like that envisioned for the AP600 would also require inspections. Both of these activities would most likely start before a COL was granted in order to support aggressive construction schedules. Therefore, the amount of construction activity that takes place offsite before we issue a COL is greatly increased over what we have done in the past (i.e., before we issued a construction permit under Part 50 some large component manufacturing took place but CP applicants did not perform the amount of offsite modular fabrication like that envisioned by the AP600).

The current construction inspection team thinking is that we would still recommend a high level of staffing as soon as we receive a COL application for the PBMR. This is what is reflected in the budget. The basis for this is the following: the amount of offsite fabrication Exelon is telling us they will perform and a COL applicant that does not reference a certified design will have to provide ITAAC as part of their application. The team recognizes that the ITAAC may change because of the staff's review, but we will at least have something to review to develop the inspection program. The staff can focus its review on long-lead time components and their ITAAC, so that we can be ready to perform those inspections as-soon-as-possible. The applicant can proceed at its own risk and, if the ITAAC, change during the remainder of the COL review, any resultant problems will have to be corrected by the licensee.

The staff is including new requirements for the COL process in the Part 52 rulemaking, so that applicants can resolve certain ITAAC during the COL proceeding. If you have any further questions on this issue, please contact Joe Sebrosky (x1132) or Jerry Wilson (x3145).