

NRC INSPECTION MANUAL

IIPB

TEMPORARY INSTRUCTION 2515/111

ELECTRICAL DISTRIBUTION SYSTEM FOLLOWUP INSPECTION

2515/111-01 PURPOSE

This temporary instruction (TI) provides guidance for followup inspection of findings from electrical distribution system functional inspections (EDSFIs).

2515/111-02 OBJECTIVES

The primary objective of the inspection is to assess the adequacy of the licensee's corrective actions for safety-significant findings identified during the EDSFI. A secondary objective is to assess the engineering and technical support (E&TS) function with respect to resolution of the EDSFI findings.

2515/111-03 BACKGROUND

For generic area team inspections, IMC 2515 requires a separate TI be developed to specifically define the requirements and guidance for conducting a followup inspection, tracking followup activities, and accounting for resources. This TI is issued to meet that IMC 2515 program requirement. The determination and review for findings from routine inspections is accomplished under IPs 92701 and 92702.

2515/111-04 INSPECTION REQUIREMENTS

04.01 Evaluate the EDSFI report, and licensee response if submitted, and make a determination of need for followup of licensee corrective actions or other actions to resolve EDSFI findings.

04.02 Conduct followup inspection of those matters of safety significance determined to need field verification of licensee corrective actions.

2515/111-05 INSPECTION GUIDANCE

General Guidance. Past EDSFIs have identified significant findings that have resulted in licensee corrective actions, such as calculational upgrades and hardware modifications, which required expenditure of major resources. The need for inspection followup is normally determined after receipt and review of the licensee's response to identified violations or deviations, or after other licensee actions for open or unresolved items.

Specific Guidance

05.01 The review of open and unresolved items from the EDSFI should be accomplished in accordance with the requirements of IP 92701. The review of any licensee response to notices of violations or deviations should be accomplished in accordance with the requirements of IP 92702.

05.02 The requirements and guidance of IP 92702 should be used to ensure that the licensee has taken adequate corrective action to close EDSFI findings. In addition, the followup inspection should be conducted using those portions of TI 2515/107, Section 05.02, "Inspection Specifics," that are applicable for the findings that are being reviewed. Special emphasis should be placed on ensuring that corrective actions are effective relative to the functional ability of the EDS. Closeout of findings should be based on a normal review of the licensee's closeout documentation. If considered necessary to ensure resolution of a safety issue, closeout of findings also should be based on field verification of actions taken by the licensee, e.g. hardware modifications and adequacy of new or modified calculations and procedures.

Any technical support the region may need to evaluate corrective actions taken or planned by the licensee for the EDSFI findings may be obtained from NRR or NRR contractors.

2515/111-06 REPORTING REQUIREMENTS

The documentation of the followup inspections are to meet the requirements of IMC 0610. The resolution of each finding documented in the followup inspection report will be clearly referenced to the original EDSFI report, using regional tracking numbers, for tracking followup and closure of the EDSFI findings and to facilitate EDSFI program summaries developed by headquarters.

2515/111-07 CONDUCTING A TEAM FOLLOWUP INSPECTION

Team inspections are to be controlled and scheduled to reduce the impact on the licensee, should the region choose a team inspection approach. Assistance in the design area, if needed, will be provided by consultants supplied through the NRR Division of Inspection Program Management (DIPM)). Where possible, inspectors who identified the findings should be used for the followup.

2515/111-08 EXPIRATION

This temporary instruction will remain in effect until completed or determined to be no longer valid and closed out during the Browns Ferry Unit 1 restart.

2515/111-09 RESOURCES

It is anticipated that the resources needed to implement the TI requirements will vary greatly in relation to the scope of followup efforts, because the scope will be dependent on the

results from each individual EDSFI. For MIPS planning purposes only, resources are estimated to be 80 hours of direct inspection.

2515/111-10 REFERENCES

Inspection Manual Chapter 0610, "Inspection Reports."

Inspection Procedure 92701, "Followup."

Inspection Procedure 92702, "Followup on Corrective Actions For Violations and Deviations."

Temporary Instruction 2515/107, "Electrical Distribution System Functional Inspection (EDSFI)."

2515/111-11 NRR TECHNICAL CONTACT

Any questions regarding this temporary instruction should be addressed to Doug Coe, 301-415-2040. Requests for contractor support should be made directly to DIPM via memorandum.

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