

August 6, 2004

Mr. Russell Bell
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

SUBJECT: LESSONS LEARNED FROM THE CONSTRUCTION INSPECTION PROGRAM
INFORMATION MANAGEMENT SYSTEM (CIPIMS) AND ITAAC
DEMONSTRATION PROJECT

Dear Mr. Bell:

This letter confirms our understanding of the lessons learned from Phase 1 of the CIPIMS and ITAAC demonstration project. The lessons learned were introduced by the Nuclear Energy Institute (NEI) at a public meeting on June 25, 2004 (Meeting Summary - ADAMS Accession No. ML041830349). NEI provided its revised list of lessons learned by letter dated July 9, 2004 (ADAMS Accession No. ML041970257).

Our review of the revised lessons learned identified three items which require clarification. Item 5, which discusses the range of NRC construction inspection activities, should reflect that the NRC will likely include all of the types of activities listed in the second sentence. As a result, the use of 'or' in the list may be misleading and should be changed to 'and' to avoid any possible confusion.

The wording for item 10, which discusses how a COL holder will maintain ITAAC acceptance criteria after the NRC has accepted the ITAAC, is acceptable. I want to note that the staff has not fully explored what action the NRC might take with respect to a corrective action program item that is material to an already accepted ITAAC. The staff intends to discuss this matter in the next phase of stakeholder interactions on construction inspection program issues.

The final clarification is for item number 13. The current wording does not fully capture our June 25th discussion on how the NRC would go about determining which ITAAC(s) is associated with a specific construction activity. I recommend that item 13 be revised to the following:

“The NRC’s construction inspections will focus on systems, structures and components (SSCs) covered by ITAAC as well as on the ITAAC directly. To facilitate the NRC’s ability to link SSCs to the appropriate ITAAC, licensees will need to provide the NRC with a separate data table relating SSCs in the construction schedule to ITAAC(s).”

Mr. R. Bell

-2-

The NRC agrees that the lessons learned reflect our understanding at this time. However, the Phase 2 activities, particularly those items related to identifying documentation requirements for each ITAAC, may make it necessary to change some of the positions described in the lessons learned.

The staff agrees with the list of Open Items that will be addressed in Phase 2 of the CIPIMS and ITAAC Demonstration Project and would like to expand an item. We have not yet completed the actions to prove that the NRC can identify, within a licensee's schedule, the information needed to schedule an inspection. As a result, we propose that Phase 2, item 5 be modified explicitly identifying the need to complete the "proof of concept" activities discussed by our information management staffs.

Please contact me at 301- 415-1073 if you have any questions on this matter.

Sincerely,

/RA/

Mary Ann M. Ashley, Team Leader
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Project No. 689

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-2-

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