COL OPERATIONAL PROGRAM REVIEW

Inservice Inspection and Testing

Governing Regulation: 10 CFR 50.55a(f) and (g)

Applicable Standard Review Plan Sections:

- 3.9.6 Inservice Testing of Pumps and Valves
- 5.2.4 Reactor Coolant Pressure Boundary Inservice Inspection and Testing
- 6.6 Inservice Inspection of Class 2 and 3 Components

At the COL application stage:

- Certify that the design will provide (a) access and (b) component and system configuration to enable the performance of inservice inspection and testing; that the scope of components to be tested and inspected conforms with applicable ASME Code requirements; and that the methods used to perform inservice inspections and tests conform with applicable ASME Code requirements. [The staff would anticipate that the plant design would facilitate compliance with Code requirements without the need for relief from those requirements based on impracticality.]

- Identify any expected requests for relief[1], proposed alternative requirements, and Code cases that will be needed or used based on editions and addenda of the ASME Code that is incorporated by reference in paragraph (b) of 10 CFR 50.55a in effect at the time of the application subject to the limitations and modifications listed in the regulation. Staff review would be documented in the COL FSER. Provide detailed request for approval of alternatives to ASME Code requirements, for example, to use risk-informed inservice inspection, if applicable.

- Adherence to NUREG-0800, Sections 3.9.6, 5.2.4, and 6.6 should result in the COL application containing ISI and IST Program information similar to that contained in current operating plant FSARs.

Within 6 months of fuel load:

- The COL holder provides to the NRC for review and approval comprehensive plant-specific inservice inspection and testing programs based on editions and addenda of the ASME Code that is incorporated by reference in paragraph (b) of 10 CFR 50.55a in effect 12 months before fuel load subject to the limitations and modifications listed in the regulation.
  - Design, scope, and methods (evaluated on a sample basis)
  - Relief requests and requests for approval of alternatives (each specifically

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[1] Because of changes that may occur in ASME Code requirements between the Code Editions and Addenda in effect at the time of the design certification application and the version of the Code in effect at the time of the COL application, the potential exists for the need for relief requests.

reviewed).

- Any compliance issues arising from program review will be resolved with the COL holder in regulatory or enforcement space, as appropriate.

- Acceptability of requests for relief and approval of alternatives along with results of sample-based review of the comprehensive plant-specific ISI and IST programs would be documented in a safety evaluation.

- Adequate implementation of the comprehensive plant-specific ISI and IST programs (i.e., compliance with FSAR and approved program) would be verified by inspection. These inspections would be an part of the Operational Readiness Assessment performed prior to the Commission's §52.103(g) finding.

Proposed license condition:

Within 6 months of scheduled fuel load, the COL holder shall submit comprehensive plant-specific ISI and IST programs to the NRC for review and approval.