

INSPECTIONS OF INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA (ITAAC) RELATED WORK

PROGRAM APPLICABILITY: 2503

65001-01 INSPECTION OBJECTIVES

01.01 To assess construction activities associated with ITAAC related work through independent inspections, work observations, and record reviews.

01.02 To determine whether programs and procedures governing the quality of ITAAC-related work provide sufficient instructions and detail for adequate work performance and control.

01.03 To provide implementation guidance for the use of the related inspection procedures (IP).

65001-02 BACKGROUND

NRC will conduct different levels of review and inspection as a means of confirming that all ITAAC have been successfully completed. The NRC will conduct direct inspections of in-progress construction activities related to targeted ITAAC, and will review the licensee's certification of each ITAAC by reviewing the licensee's supporting records.

All ITAAC will be reviewed by the NRC, but not to the same level of detail, review, or direct observation. The inspections attached to this procedure focus inspection resources to those ITAAC having the most inspection value.

65001-03 INSPECTION REQUIREMENTS AND GUIDANCE

03.01 Plan the inspection.

Guidance:

Comprehensive inspection planning should include the following:

- Reviewing the applicable IP and the related ITAAC for the particular site design.
- Reviewing the site design control document (DCD) and final safety analysis report (FSAR).

- Developing an inspection plan that identifies ITAAC-related work for review during the scheduled inspection. Targeted ITAAC are those specific ITAAC designated for direct inspection by a specific IP. The list of targeted ITAAC for a particular site and design is available from the cognizant NRC management for that site or from the site resident staff.
- Direct inspection entails any work observations, SSC field examinations, engineering review, records review, or related inspection activities that provide an independent NRC verification of a particular ITAAC attribute. Direct inspection may also include follow-up inspection checks; e.g., confirming that adequate corrective measures were taken for a problem identified during a work observation or checking that a material certification is correct if a conflict is identified in the work control documents.
- Coordinating with the NRC inspection scheduler (NIS) in order to efficiently plan the timing of the inspection and the required inspection resources.
- Reviewing the applicable site data in the Construction Inspection Program Information Management System (CIPIMS) to determine if any previously identified open issues, findings, or observations are relevant to the process or program inspection being planned.
- Select for direct inspection a sample of the attributes that are included in the written description of each targeted ITAAC. The inspector can select inspection attributes from either the inspections, test, and analyses performance requirements or from the acceptance criteria. The ITAAC attributes selected for inspection must then be incorporated into the plans for each of the scheduled inspections. Each attachment to this procedure contains a list of all of the ITAAC for the specific design associated with that attachment. In each matrix family the sample of ITAAC to be inspected will include:
 - all of the targeted ITAAC, and
 - at least one ITAAC from any family without targeted ITAAC.
- Ensuring that the targeted ITAAC are representative of all similar ITAAC work. This is accomplished by determining whether multiple contractors or different programmatic controls are involved in the same process or program for the given inspection. If the same licensee programmatic controls govern all construction activities being inspected, the targeted ITAAC selected for review should be representative of these activities. However, if different contractors using their own unique program controls are performing similar work, NRC inspection planning should consider inspecting some additional work activities from the different contractors as another independent inspection sample.
- Reviewing the applicable licensee specifications, procedures, and work control documents to understand the scope and content of the licensee's programmatic controls and how related ITAAC activities may be affected.

- Selecting a sample of non-targeted ITAAC-related work which may also be available for inspection during the planned inspection. This independent inspection sample may be chosen based upon review of the CIPIMS data or from previous construction performance problems.
- Checking the CIPIMS data base for a list of the licensee construction procedures that have been previously reviewed and for any previous NRC inspection observations that may suggest areas for further procedural examination. Inadequacies identified in the procedural work controls or inconsistencies with the applicable codes and standards should be followed up, not only from the standpoint of effecting corrective actions to identified procedural problems, but also because an incorrect procedural provision can lead to a construction error and a related ITAAC deficiency.

03.02 Perform the inspections in accordance with the following IPs associated with the ITAAC Matrix as listed in Appendix A of Inspection Manual Chapter (IMC) 2503:

65001.01	Foundations and Buildings
65001.02	Structural Concrete
65001.03	Piping
65001.04	Pipe Supports & Restraints
65001.05	RPV & Internals
65001.06	Mechanical Components
65001.07	Valves
65001.08	Electrical Components & Systems
65001.09	Electrical Cable
65001.10	I&C Components & Systems
65001.11	Containment Integrity & Penetrations
65001.12	HVAC
65001.13	Equipment Handling & Fuel Racks
65001.14	Complex Systems with Multiple Components
65001.15	Fire Protection
65001.16	Engineering
65001.17	Security
65001.18	Emergency Planning
65001.19	Radiation Protection
65001.A	As-Built Inspection
65001.B	Welding
65001.C	Construction Testing
65001.D	Operational Testing
65001.E	Qualification Criteria
65001.F	Design/Fabrication Requirements

Guidance: Each IP listed above identifies the requirements and guidance for the independent inspection of ITAAC-related work. This work is divided into the 19 construction processes and six programs framed by the ITAAC Matrix as defined in IMC 2503.

The ITAAC which have been targeted for inspection are identified in Appendix A to this

inspection procedure. This list is based on certified design information only. Site specific ITAAC will be added based on the site specific inspection plan.

The IP 65001 procedures are not intended to implement a programmatic evaluation of problem identification and resolution (PI&R) effectiveness. This will be accomplished as part of inspections directed by IMC-2504. During inspections governed by IP 65001 and its attachments, the inspector should confirm that any identified problems are properly entered into the licensee's PI&R program. The inspector may also then review the licensee's problem identification record to determine whether there is a history related to the identified problem and to assess the adequacy of the licensee's corrective actions to prevent recurrence. While it is prudent for inspectors to review CIPIMS data to determine if relevant findings exist in their area of inspection, the planning process for the conduct of IP 65001 activities should not include a general review of the licensee's problem identification program (e.g., nonconformance reports) to identify issues to inspect.

Inspectors should be aware that several ITAAC may have performance criteria and technical details related to more disciplines than just the IP being implemented. Accordingly, the inspection procedures may guide the inspectors to other related IPs. For example, if inspecting MOVs using the Valves IP, the guidance for performing an inspection of the motor will be found in the Electrical Components IP. Thus the inspector should reference the Electrical Components procedure as needed to support the specific inspection being performed.

65001-04 RESOURCE ESTIMATE

There are no resource estimates associated with this portion of this procedure. All planning, coordination, and inspection resources expended in the conduct of IP 65001 activities should be allocated to one of the 25 IPs listed in section 03.02.

Inspection-hours expended during the inspection of ITAAC or related construction activities should be recorded in CIPIMS against the selected ITAAC and the specific IP. Even if another IP is referenced and utilized for the performance of an ITAAC inspection, the CIPIMS protocol requires that the IP for which ITAAC inspection-hours are being charged always aligns with the governing ITAAC Matrix family.

END

Exhibit 1: Revision History for IP 65001

Attachments: as listed in section 03.02 of this IP

Appendices: Certified design ITAAC baseline criteria.

Note: This information will be added when programmatic decisions in this area have been finalized.

Exhibit 1

Revision History For 65001

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
	10/03/07 CN 07-030	Researched commitments for 4 years and found none. Initial Issuance	N/A	N/A	N/A