

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 94300

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### STATUS OF PLANT READINESS FOR AN OPERATING LICENSEE

PROGRAM APPLICABILITY: 2512, 2513, and 2514

#### 94300-01 INSPECTION OBJECTIVES

01.01 Provide a status of the inspection program and findings.

01.02 Provide a summary status of preoperational testing and identify incomplete system acceptance and testing by the licensee.

01.03 Provide a summary status of the construction of the facility and identify areas where construction is incomplete.

01.04 Provide an evaluation of the licensee's management readiness to perform QA activities during operation of the plant (reference Exhibit 2).

01.05 Provide a status of open items and their significance (specific milestones).

#### 94300-02 INSPECTION REQUIREMENTS

02.01 90-Day Status Report. Approximately 90 days before the scheduled issuance of the operating license, the regional office will prepare a status report using the format of Exhibit 1. The status report will be transmitted by memorandum to the responsible Licensing Division Director in the Office of Nuclear Reactor Regulation (NRR) with a copy to the Director, Office of Inspection and Enforcement (IE). This memorandum will include the region's evaluation as to whether or not the published fuel loading date is realistic in terms of the work remaining to be completed by the licensee. The status report will address the following areas, as appropriate:

- a. Inspection Program. Review the status and findings of inspections required by MC 2512, 2513, and 2514, and identify all outstanding inspection areas and the reason(s) for the incompleteness.
- b. Enforcement Items. Identify any violation for which corrective action has not been completed and all unresolved items and their status.
- c. Testing Programs. Identify Category I-III preoperational testing committed to in the FSAR that is incomplete, startup tests not yet developed and their status, and list system performance deficiencies and plans for correction.

- d. Construction Status. Define systems for which construction is not completed, list any system or significant component not formally accepted by the licensee, and list items from the construction punchlist which could offset the safe startup and operation of the plant.

02.02 Status Report Update. The 90-day status report will be updated every four to six weeks until one month before scheduled fuel loading.

02.03 30-Day Status Report. Approximately 30 days before the operating license is scheduled to be issued, the regional office will prepare a status report using the format shown in Exhibit 2. The region will transmit the status report by memorandum to the Director of NRR with a copy to the Director of IE. This memorandum will include the results of the region's inspection efforts; items that remain to be completed, with appropriate milestones; a statement concerning the implementation of the licensee's QA program; and the region's recommendations for issuance of an operating license. Items remaining to be completed and their impact on the proposed issue of the operating license will be listed by completion milestones and identified in separate enclosures. Each item should be written with sufficient detail provided so that the material may be directly incorporated into the license. Sufficient detail should also be provided to support the rationale for incorporation into the license. Enclosures will address the following milestones as appropriate.

- a. Items to be Completed Before Fuel Loading.
- b. Items to be Completed Before Initial Criticality.
- c. Items to be Completed Prior to Exceeding 5% Rated Thermal Power.
- d. Items to be Completed Prior to Achieving Full Power Operation.

#### 94300-03 INSPECTION GUIDANCE

General Guidance. Conditions for issuance of an operating license are defined in 10 CFR 50.57. Any items that could affect the issuance of an operating license must be identified to NRR directly with a copy to IE.

##### 03.01 Specific Guidance

- a. 90-Day Status Report 02.01. The status report issued 90 days before the scheduled fuel loading date may be fairly general in topic identification. It is intended to present a general scope of the status of construction completion, preoperational testing, and the inspection program. It is the first identification of overall facility status and provides the initial list for tracking open items as well as identification of any special problem areas. The region uses the information contained in this report to comment on the feasibility of the licensee's schedule for fuel loading.
- b. Status Report Update 02.02. Past experience has indicated that the licensee's scheduled fuel loading date is generally optimistic. When there is a large variance in the scheduled fuel loading date and the region's estimated fuel loading date, it may be preferable to update the status report on a 6-week basis or longer, depending on the variance. As the licensee gets closer to the fuel loading date, the issue frequency of the report should increase and it should become more specific with emphasis placed on impact assessment. If appropriate, the listing of open items also should be discussed with the licensee on a continuing basis.

- c. 30-Day Status Report 02.03. The 30-day report should categorize the remaining open items by the milestone at which they must be completed. To arrive at this milestone categorization, the proposed technical specifications may be used as guidance. Open items must be resolved for any system or component, prior to the time the facility technical specifications requires it to be operable. Categories of open items are to be considered only as regional recommendations until they are endorsed by the operating license. In those situations where the list of open items is long and/or the fuel loading date is delayed after the 30-day report is issued, the region should consider issuing a final memorandum a few days before the anticipated issuance of the operating license. If the region believes that issuance of the 30-day report is premature based on plant circumstances, the report can be delayed; however, status report updates should continue as stated in section 02.02.

END



EXHIBIT 1

EXAMPLE

FORMAT FOR 90-DAY STATUS REPORT

MEMORANDUM FOR: Robert Bernero, Director  
BWR Licensing Division, NRR

FROM: Charles C. Norelius, Director  
Division of Reactor Projects, Region III

SUBJECT: CLEVELAND ELECTRIC ILLUMINATING, PERRY UNIT 1  
DOCKET NO. 50-440, STATUS OF FACILITY COMPLETION

This memorandum is forwarded to provide you information on the preparedness for licensing of Perry Unit 1. Enclosures 1 through 4 include items requiring inspection and resolution before a finding of readiness for operation can be endorsed by Region III. The categories used are consistent with those used by the applicant. Cleveland Electric Illuminating estimates a fuel load date of early November 1985. Region III considers December 1985 as a realistic, yet optimistic, time frame for a licensing decision, contingent upon satisfactory resolution of the issues presented in the enclosures to this memo.

If you have any questions concerning this matter, please contact me or Mr.R.C.Knop of my staff.

Charles C. Norelius, Director  
Division of Reactor Projects

cc: J. Taylor, IE

Enclosures:

1. Open Items Including  
Enforcement and Unresolved Items
2. Preoperational and Acceptance  
Testing Status
3. Construction Status
4. Status of Inspections Required  
by MC 2512, MC 2513 and  
MC 2514 (Summary)

(For each item in the above enclosures, the expected or required completion date and an assessment of the significance, should be included.)

## EXHIBIT 2

### EXAMPLE

#### FORMAT FOR 30-DAY STATUS REPORT

MEMORANDUM FOR: Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

FROM: J. Nelson Grace, Regional Administrator

SUBJECT: DUKE POWER COMPANY, CATAWBA UNIT 1, DOCKET NO.  
50-413, STATUS OF FACILITY COMPLETION

Based on the results of our inspection efforts in implementing the prescribed NRC inspection program and other related inspection activities, we have determined that construction and preoperational testing of Catawba Unit 1 Nuclear Station have been completed in accordance with the FSAR, other docketed commitments, and regulatory requirements, with the exception of items indicated in the enclosures. Remaining construction, testing, and inspection items identified in the enclosures have been categorized by recommended completion milestones.

As part of our inspection efforts, we have reviewed the licensee's preparations for implementation of the Quality Assurance Program for Operations. We have found that an organization and procedures are in place to give reasonable assurance that the licensee's Quality Assurance Program (Chapter 17 of the FSAR), which was reviewed by the Office of Inspection and Enforcement, can be adequately implemented.

We recommend a full power license be issued, as conditioned by the items listed in the attached enclosures.

J. Nelson Grace  
Regional Administrator

cc: J. Taylor, IE

Enclosures:

(A separate enclosure should be included for each of the following completion milestones. An assessment of significance should be included for each item.)

1. Items to be Completed Before Fuel Loading
2. Items to be Completed Before Initial Criticality
3. Items to be Completed Prior to Exceeding 5% Rated Thermal Power
4. Items to be Completed Prior to Achieving Full Power Operation