

# IMC 2504

## Construction Inspection Program

### Non-ITAAC Inspections

NRO/DCIP/CCIB

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Attachment 3

## *IMC 2504, Construction Inspection Program Non-ITAAC Inspections*

### Purposes:

- To specify the non-ITAAC inspection policies for reviewing the programs supporting construction and operational readiness of a plant licensed under 10 CFR Part 52.
- To furnish the inspection policies to assess whether a licensee conforms to and correctly implements the initial test program contained in the FSAR for pre-operational and startup testing.
- To provide guidance for a plant licensed under 10 CFR Part 52 for transition to oversight under the ROP (Reactor Oversight Process) for power operations.

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### Objectives:

- To assess whether the licensee has a construction program which addresses quality assurance (QA), problem identification and resolution, reporting of defects and failures to comply under 10 CFR 50.55(e), qualification and training of construction staff, work planning, oversight and control of contractors, and completion and submittal of ITAAC for verification by the NRC.
- To determine if the operational programs, required both for the initial loading of the fuel and for the initiation of low-power testing are established and functioning.
- To assess whether management controls and procedures, including quality assurance and problem identification and resolution (PI&R) programs, necessary for operation of the facility have been documented and effectively implemented.
- To verify that the licensee is meeting the requirements and conditions of the facility license for initial fuel loading, initial criticality, low-power testing, and power ascension tests.
- To determine the operational readiness of a plant licensed under 10 CFR Part 52 for commercial operation.
- To provide an objective basis, for a plant licensed under 10 CFR Part 52, to transition to monitoring by the reactor oversight program (ROP).

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### Inspections:

Main Points for this IMC are:

- Construction Programs:
  - Problem Identification & Resolution (PI&R) Programs
- Management & Operational Programs
  - Security/Safeguards Programs Including Access Authorization
  - Plant Staff Training
  - Employee Concerns Programs
  - Fire Protection
  - Maintenance Rule
  - Radiation Protection
- Engineering Design Verification
  - Engineering Design Activities
  - Engineering Change Programs
- Quality Assurance Programs
- Construction testing
  - Pre-Operational Testing
  - Pre-Criticality
  - Startup/Low Power Testing

## *IMC 2504, Construction Inspection Program Non-ITAAC Inspections*

### Inspection Administration:

- Inspection Planning & Scheduling (IP&S):
  - Sample Size & Frequency determined by CIP Staff
- Periodic review of the inspection results using IMC2505
- Requirements apply regardless of location (on-site, off-site, vendor site.)

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Areas this IMC is NOT applicable to:

**ITAAC !**

- IMC2504 will be in parallel BUT independent of IMC2503

## *IMC 2504, Construction Inspection Program Non-ITAAC Inspections*

### **CLOSING Out of IMC2504:**

IMC2504 can be closed after the following conditions are met.

- all significant construction and testing activities are complete.
- licensee corrective actions for significant deficiencies for construction, testing, and startup activities have been implemented and demonstrated effective.
- all other construction, testing, and startup open items have been placed in the licensee's corrective action program.
- the licensee has established a program to benchmark and to collect performance indicator (PI) data.
- the ROP tools can be duly applied for determining licensee performance in each of the seven cornerstones of safety.
- the plant has completed a minimum of 100 hours of commercial operation.
- Verification of Operational Programs in the COL has been accomplished.
- The cornerstones of safety can be monitored by the ROP process.
- IMC0609, Significance Determination Process (SDP), can be used to characterize any non-compliance.