

New Reactor

**Comments on NEI 08-02 “Problem
Identification and Resolution for New
Nuclear Power Plants During Construction”
January 29, 2009**

Presentation Topics

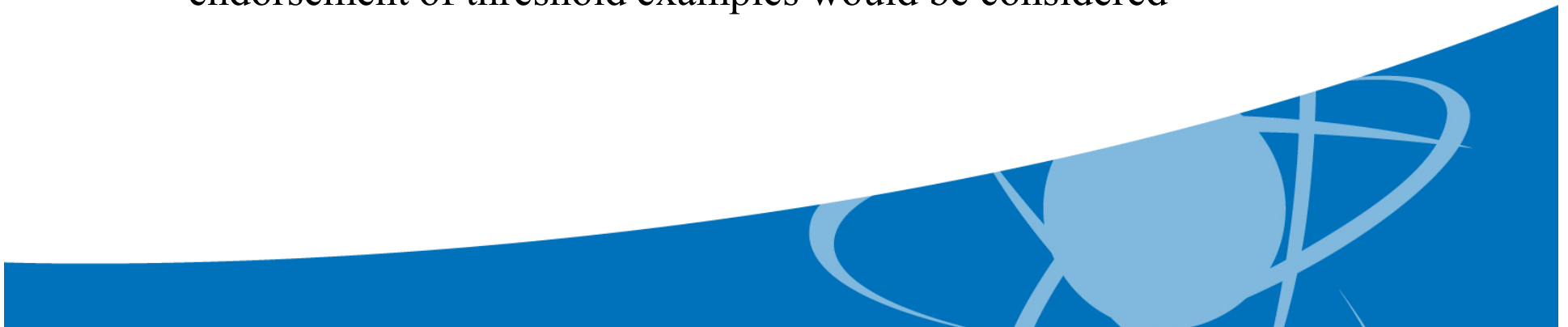


- NRC's key messages after considering NEI 08-02
- Specific discussion points and examples
- Future Interactions



NRC's Key Messages

- Generally a good high level generic document
- Difficult to determine value of NRC endorsement since NEI 08-02 has a similar level of detail to the QAPDs that are part of COL applications
- Not detailed enough to use as an implementing procedure and does not support a reduction of NRC inspections
- Extensive NRC and stakeholder interaction required before endorsement of threshold examples would be considered



Discussion Points

- Good description of responsibilities for managing the PI&R program but lack of guidance on how the program will maintain communication for the delegation of work
- Concept of broadening trending is a strength, however description of trending does not specifically include the controls needed to address adverse trends
- Corrective Action Program is limited to significant conditions adverse to quality
 - Other conditions need to be considered



Discussion Points



- The three levels of significance and the definitions used for these categories are inconsistent with 10 CFR 50 Appendix B Criterion XVI and QA-related RGs
- Lack of guidance on how to categorize issues from one level of significance to another using examples in Attachment 2.
- Conflict of information between statements in Section 4.4 of NEI 08-02 and 10 CFR Part 50, Appendix B, Criterion XVI.



Discussion Points

- Examples in Attachment 2 lack a clear description of thresholds
- Thresholds are needed to effectively apply the 3 categories
- Examples include:
 - Attachment 2, Page A2-3: The three items listed in the Non-significant column would only be non-significant if they were identified through or prior QA. If QA missed the item and then it is caught subsequently it would be a QA issue.
 - Attachment 2, Page A2-3, first bullet in middle column: This would seem to be significant since it could be a failure of the supplier's QA program.
 - Attachment 2, Page A2-4, first column: How do you treat multiple weld contractors that have a common issue? Each individual item may not be significant by itself but several of these types of problems, when looked at as a whole, might indicate a bigger problem.
 - Attachment 2, Page A2-5, first column: The one example would be non-significant if the issue was isolated but not if it was not an isolated example. This raises the question of how do you know if an issue is isolated or not if they are being fixed by each contractor so that they cannot be trended overall.

Future Interactions



- Discuss value of NRC endorsement without added detail
- Discuss level of detail and specific implementing attributes
- Resolve differences in threshold documentation and reach agreement on examples



Questions/Comments

