

Industry Comments on Draft IMC-2504, Inspection of Construction and Operational Programs

(Draft IMC-2504 provided for comment 7/23/09)

IMC Section/ Paragraph/Sentence	Comment	Proposed Resolution
<p>1. 2504-06, first large paragraph</p>	<p>The end of the paragraph states. "Operational programs that do not have ITAAC will be listed in Chapter 13 of the FSAR and will be fully described in the COL application. <u>Any</u> operational program without implementation requirements in the regulations will be subject to a license condition which will require the licensee to provide implementation milestones and to maintain an updated implementation schedule."</p> <p>Licensees will implement numerous operational programs, e.g., Housekeeping/Cleanliness Programs, that will not be subject to the license condition referred to here. Clarification is needed to focus on programs required by NRC regulation that are listed in the FSAR.</p>	<p>Revise the last sentence to read "Required operational programs..." or "Operational programs listed in Chapter 13 of the FSAR ..."</p>

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<p>2. 2504-06, second to last paragraph</p>	<p>This paragraph states, "The construction inspection staff will ensure that the operational programs are properly established and that the <u>pre-operational testing and all required corrective actions</u> have been completed prior to fuel load.</p> <p>Clarification is needed regarding the corrective actions "required" to be completed prior to fuel load. As we have discussed in the context of ITAAC Maintenance, SSCs may be out-of-service at the time of the Section 52.103(g) finding authorizing fuel load, and technical specifications take effect to assure SSCs required for fuel loading are operable.</p>	<p>Delete the highlighted/underlined phrase, especially if it refers to corrective actions associated with operational programs and preoperational testing. If operational programs are properly established and preoperational testing is successfully completed, completion of "all required corrective actions" is sufficiently implied, and the phrase is unnecessary.</p> <p>If the intent of the highlighted/underlined phrase is broader, it should be made clear that the scope of this 2504-06 instruction is limited to the scope of the construction and operational programs covered by IMC-2504 as identified in Sections 08-01 and 08-02. The scope of this instruction should not extend to inspection of SSCs under IMC-2503.</p>
<p>3. 2504-06, second to last paragraph</p>	<p>This paragraph states, "The construction inspection staff will ensure that the operational programs are properly established and that the <u>pre-operational testing and all required corrective actions have been completed prior to fuel load.</u>"</p> <p>There may not be a bright line between Preoperational and Startup testing as implied by this statement. Based on experience with the previous generations of plants, there may be some preoperational tests or open items related to preoperational tests that can't be completed until after fuel load because of the required plant conditions.</p>	<p>Based on Comments 2 &amp; 3, revise the sentence to read as follows:</p> <p>"The construction inspection staff will ensure that the operational programs are properly established and that <del>the required pre-operational testing and all required corrective actions have</del> <u>required</u> pre-operational testing <del>and all required corrective actions have</del> been completed prior to fuel load."</p>

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<p>4. Section 08-01; Section 08-01.d; Appendix A</p>	<p>Radiation protection-related inspections during construction should be focused on the impact of site construction on 10 CFR 20.1406 programs (e.g., impacts on the Site Conceptual Model).</p> <ul style="list-style-type: none"> <li>• Radiography is conducted under Part 34 licenses and is outside the scope of NRC new plant Construction Program inspections.</li> <li>• Operational RP programs are implemented based on milestones identified in the FSAR and are inspected as identified in Section 08-02 (Operational Programs) and Appendix B. Operational RP programs should not be included in Section 08-01 as part of Construction Programs.</li> </ul> <p>Given the focus of 10 CFR 20.1406-related inspections during construction, these inspections should be characterized more precisely in IMC-2504.</p>	<ol style="list-style-type: none"> <li>1. Inspections related to the impact of site construction on 10 CFR 20.1406 programs should be called "10 CFR 20.1406 Program during Construction" (or equivalent), instead of the too-broad "Radiation Protection during Construction."</li> <li>2. The description of the scope of these inspections provided in Section 08-01.d should be modified to read as follows:  "The NRC will evaluate licensee processes that address radiography, radiation protection program during construction, and construction impact on 10 CFR 20.1406 programs."</li> </ol>
<p>5. Section 08-01.h</p>	<p>This section says that Regulatory Guide 1.68 describes the general scope and depth that the NRC staff considers acceptable for Initial Test Programs for light-water-cooled nuclear power plants.</p> <p>This section should also identify that NRC-approved ITP requirements for new plants are identified in FSAR Section 14.2.</p>	<p>Add to this section that NRC-approved ITP requirements for new plants are identified in FSAR Section 14.2.</p>

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6. Section 08-02.b	<p>This section states, "Licensees must implement the operational programs necessary to support <u>each milestone of</u> plant preparation for operation before the program is required by regulations or by a license condition in the COL."</p> <p>The language about implementing operational programs to support "each milestone" of plant preparation for operation could be interpreted to conflict with the requirement to implement programs as required by NRC regulations or license condition.</p>	<p>Delete the highlighted/underlined phrase, "each milestone of" so the sentence reads as follows:</p> <p>"Licensees must implement the operational programs necessary to support plant preparation for operation before the program is required by regulations or by a license condition in the COL."</p>
7. Section 08-02.e.5	<p>Bullet 5 says that the staff will report to the Commission on, "Management involvement with the development, revision, implementation, and <u>enforcement</u> of the operational programs."</p> <p>Licensee management is responsible for overseeing operational program implementation, not enforcement.</p>	<p>Replace "enforcement" with "oversight."</p>
8. Appendix A, p. A-1	<p>Item 4 in the second paragraph says that one purpose of IMC-2504 inspections is to, "Ensure design requirements are translated to construction documentation."</p> <p>We understand that Engineering Design Verification inspections will be covered by IMC-2507.</p>	<p>Delete Item 4 regarding Engineering Design Verification inspections.</p>

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9. Appendix A, p. A-1	<p>Item 5 in the second paragraph says that one purpose of IMC-2504 inspections is to, "Ensure the adequacy of ITAAC determination packages for submittal to the NRC."</p> <p>The licensee will submit ITAAC Closure Letters to NRC, not "ITAAC determination packages." As defined in NEI 08-01, an "ITAAC Closure Package" contains the information and records documenting the work performed to verify and close an ITAAC. Once completed, the ITAAC closure package will be available for NRC inspection at the plant site.</p>	<p>Revise Item 5 to read, "<u>Verify that the licensee has an effective process to ensure the adequacy of ITAAC Closure Letters</u> <del>determination packages</del> for submittal to the NRC."</p>
10. Appendix B, p. B-2	<p>IP-80522, Part 52 Radiological Environmental Monitoring Program (REMP), is listed under both the Process and Effluent Monitoring Program and the Radiation Protection Program.</p>	<p>Delete IP-80522 from the Radiation Protection Program.</p>
11. Section 08-01.e	<p>The first sentence of this section states the "NRC will verify the adequacy of the licensee's program for developing ITAAC closure determination submittals."</p> <p>The last sentence of this section states, "Knowledge of a licensee's program for controlling ITAAC determination submittals will be factored into the level of review performed by the NRC on individual ITAAC determinations submitted by the licensee."</p>	<p>Revise the first sentence to state, "the NRC will verify the adequacy of the licensee's program for developing ITAAC <u>Closure Letters</u>."</p> <p>Revise the last sentence of this section to state, "Knowledge of a licensee's program for <u>developing ITAAC Closure Letters</u> will be factored into the level of review performed by the NRC on individual ITAAC <u>Closure Letters</u> submitted by the licensee."</p>