



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

Construction Assessment Program Activities

Tom Kozak, NRO

November 5, 2009



Construction Assessment Program Activities

- SECY paper and Commission meeting October 22, 2008
- SRM issued on December 5, 2008
 - Reconsider the assessment process and propose policy options to the Commission
 - Address inclusion of objective elements such as construction program PIs and SDPs analogous to those used in the ROP
- January 29, 2009, March 19, 2009, May 14 public meetings to discuss assessment program options developed by NRC staff



Construction Assessment Program Activities

- **July 2, 2009, NEI submitted a letter to the NRC, entitled “Proposed Construction Inspection Assessment Process”**
 - Describes regulatory framework including cornerstones and SC
 - Includes SDP-like process to evaluate findings
- **July 23, 2009, NEI presented CIAP concept during public meeting**
- **August 14, 2009, Staff issued Information SECY Paper 09-0113**
 - The staff plans to issue revisions to IMC 2505 and IMC 0613 by November 30, 2009, including an approach to safety culture similar to the existing ROP
 - The staff intends to continue working with stakeholders on the development of assessment program policy options, including long-term options that are being considered for incorporating safety culture into the construction assessment process.
 - The staff plans to submit construction assessment program policy options to the Commission by November 2010
- **November 16, 2009 Construction Assessment Panel Meeting**



Construction Assessment Panel

- Construction Assessment Panel on November 16
 - Mike Johnson, Director NRO
 - Luis Reyes, Administrator, Region II
 - Fred Brown, Director, DIRS, NRR
 - Tony Petrangelo, NEI
 - Tom Houghton, NEI
 - Mark McBurnett, STPNOC
 - Bryan Dolan, Duke
 - Jim Sommerville, State of Georgia
- Assembled to provide NRC and Stakeholder views regarding construction assessment program options



Construction Assessment Panel

- Opening remarks to be provided by Glenn Tracy
- Brief presentations by panel members
- Facilitator will pose approximately 10 questions to panel members
- Public will be given opportunity to address panel members



Draft Questions for Panel Members

- What key activities/key milestones do you envision in the development of construction assessment program options leading to the SECY Paper due in November 2010?
- The reactor oversight process framework includes strategic performance areas, cornerstones, and cross-cutting issues. What key attributes of the current ROP should be included in the construction assessment program?
- The operating reactor assessment program uses performance indicators and the significance of findings as inputs to the action matrix. Do you believe that these inputs should be included in the construction response table?



Draft Questions for Panel Members

- What elements of the operating reactor assessment program do you believe should not be included in the construction assessment program?
- The operating assessment program uses the significance determination process to evaluate most findings. Other assessment programs use traditional enforcement to evaluate the significance of inspection findings. What process do you believe should be used to evaluate the significance of construction inspection findings?
- In NEI's CIAP proposal, it is proposed that findings not associated with ITAAC criteria (i.e. construction findings) all be assigned a green color. Is this an appropriate threshold for these types of findings? If so, what should be used as an indicator for NRC to increase/decrease its inspection activities?
- The NRC currently assigns safety culture component aspects to findings when appropriate. Substantive cross-cutting issues are identified when certain thresholds are crossed. Should the NRC treat findings in a similar manner in the construction environment?



Draft Questions for Panel Members

- If the NRC develops a new construction assessment program to replace the program as described in MC 2505, when and how should this program be implemented? Do you envision a pilot plant, parallel implementation, immediate implementation, etc?
- What interactions with senior NRC and industry managers do you envision as the construction assessment program options are developed?
- IMC 2505 is being modified to more fully define CSFIs and take them out as a direct input in the Construction Response Table. Do you recommend any other near term revisions to the assessment program that is documented in MC 2505 and will be implemented in the near future at sites under construction?



Next Steps

- **A multi-office working group will be formed to develop construction assessment program options**
- **Group will meet routinely, work closely with stakeholders, and discuss progress at scheduled public meetings**



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Input/Feedback/Questions