



Development of Construction Assessment Program Options

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Assessment of Licensee Performance

- Must be transparent, predictable, and objective
- Must integrate unrelated inspection results
- Must result in appropriate NRC response to licensee performance
- Must include an evaluation of safety culture
- Must be effectively communicated to stakeholders

Development of Assessment Program Options for Commission

- The NEI CIAP proposal holds promise for developmental work
- *However*, we must evaluate and consider ALL aspects of the ROP as they relate to construction
 - Strategic Performance Areas, Cornerstones, Cross-cutting Issues/Elements of Safety Culture, SDP, and PIs
- Must address lessons learned, including those from NUREG-1055
- Development of CIAP proposal will require NRC and stakeholder resource commitment

Vision for Construction Assessment

- Strategic performance areas need to focus on:
 - construction IAW design (ITAAC)
 - construction and operational programs
- Cornerstones need to align with strategic performance areas
- The current inspection procedures must be supplemented to ensure cornerstone assessment is complete
- Evaluation of Construction Safety Culture must be consistent with overall NRC Safety Culture approach
- Significance determination must allow for appropriate NRC response to declining licensee performance

Elements of Inspection and Assessment

- **Construction IAW design (ITAAC)**
 - Construction inspection program is risk-informed through ITAAC
 - ITAAC Maintenance
- **Construction and operational programs**
 - Implementation of construction programs
 - Implementation of pre-operational testing
 - Readiness of operational programs

Construction Assessment Program Summary

- Inspection program must cover all areas important to construction safety
- Significance determination thresholds for all types of findings
- Integration of inspection findings into performance assessment
- Appropriate NRC response to licensee performance
- Effectively communicate assessment to stakeholders
- Dedicate resources required for timely development and implementation