

NRC Staff Comments for Discussion at Public Meeting on December 8, 2009

NEI 08-02 "Corrective Action Processes for New Nuclear Power Plants During Construction", Revision 3

- The changes made to revision 3 do not provide enough clarification on how the work processes include part of the corrective action process in place at a site. The document does not provide guidance on how licensees will interact with suppliers and vice versa in terms of the work processes' corrective actions. The guidance in place will not provide enough reassurance that the screening process will be conducted uniformly for individuals responsible for the work process and the CAP.
 - NRC requested that if the intent of the definition of Construction Corrective Action Process was to define it as the umbrella concept for both the CAP and the corrective action process in the work processes it should have been explicitly stated in order to set the proper tone for the rest of the document.
 - Per our discussion it was understood that the work process corrective action measures will occur with-in it, to handle CAQ and/or non-conformances. The way it is currently defined does not make it clear (as with the definition of CAP) that the work process will have management process/tools to correct CAQ/non-conformances in compliance with the requirements stated in the definition. Not mentioning that the work process has a corrective action process in place to handle issues, creates the impression of the work process being something completely different from the expected corrective action programs.
 - Based on previous construction experience and issues identified during inspection of construction projects like MOX/LES corrective actions programs delegated to suppliers have not been implemented as intended. The document should try to provide more guidance/expectation on how the corrective action process in the work process will work in conjunction or communicate with the licensee. Section 3.4 seems like the right place to expand on these expectations. The sentence of ... **suppliers been responsible for developing** ... is not correct. Licensee should develop or validate corrective action processes in the suppliers' work processes. Language should reflect this concept, similar to words in your previous revision.
 - Section 4 has good information on what the corrective action process should establish for an effective program. None the less it does not provide additional information to help clarify the concept of how conditions identified on site will be handled in either the CAP or the corrective action process with-in the work processes established for the different work activities. Some of this information could be inferred by the flow diagram but the document should be more explicit on how it is expected issues will be handled by these multiple corrective processes and how will the licensee be able to effectively keep oversight of them.

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- Section 4.2.1 should specify that the licensee should develop a screening process that shall be uniformly used on site. This will ensure that licensee personal evaluating issues entered into the CAP/work process and contracted personnel evaluating issues entered in the corrective action process of the different work processes will adequately evaluate these issues.
- Section 4.2.2 should explicitly link or explain that when the document refers to how each organization will implement the corrective action processes it means each organizations implementation of the work processes, CAP and the path these issues can take from identification/handling in the work processes' corrective action process into the CAP. The current information is correct but it should put both concepts (CAP and Work Process) in the forefront of the document.
- Section 4.2.2 should limit the use of the words low significance and just use defined terms as CAQ/SCAQ. The same comment on what is meant by otherwise significant.
- Section 5 still uses the words **some degree of corrective action**. Per our discussion the work process will have with-in it part of the corrective action process that should have been discussed earlier in the document (previous comments). This choice of words is confusing as to what is intended. This section should mention (as it is our understanding) that the corrective action process with-in the work process will be (in addition to in procedures) in a management process/tool; to clearly indicate it is a stable program under the oversight of responsible management. This also seems a good section to add a few sentences on how work processes established by suppliers will comply with the requirements established by the licensee and how the licensee should conduct oversight to ensure compliance.
- In Section 5, the paragraph beginning **with In addition to the corrective action requirements of Criterion XVI...** the writing remains confusing as to what is the intended purpose. It would be preferable that the document would elaborate on an example of what a work process would look like and how the corrective action process will accomplish the intended requirements. Then the document could mention the NQA-1 requirements as further examples to use by licensees to develop procedure requirements for the corrective action process in their respective work process.
- Section 7 should address what actions need to be taken, if a transition to the operating CAP is going to occur in a subsystem well before fuel load. In terms of **ITAAC maintenance**: the operational CAP is designed to handle Tech Spec issues while the construction corrective action processes is designed to handle ITAACs. This needs to be addressed.
- Attachment 1 inside the CAP if an issue is determined to not be a SCAQ/ITAAC the third logic block says Implement Correction. This block should read similar to the block in Work Process: **Implement Correction, Document and trend**.
- **The document does not specify how Non conformances will be disposition in accordance with Criterion XV as part of the applicability/scope. The document**

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must determine or make it clear if it intends for all non conformances to be handled by the corrective action processes or if there will be another process for handling them. The following instances could be modified to make it clear as well as including a sentence in the applicability section stating Criterion XV will be met by the implementation of the document.

- In section 5 the sentence **NQA-1-1994 Basic...discuss the resolution of non conformance...** should be put in context to explicitly state that all of those issues will be handled in the corrective action process with-in the work processes.
- The last sentence of section 5 should also state that it needs to be in compliance with Criterion XV of Appendix B 10 CFR 50.

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