



NUCLEAR ENERGY INSTITUTE

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February 19, 2010

Mr. Glenn Tracy
Director
Division of Construction Inspection and Operational Programs
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 08-02, *Corrective Action Processes for New Nuclear Power Plants During Construction*, Revision 3, February 2010

Project Number: 689

Attached for NRC review and endorsement is NEI 08-02, *Corrective Action Processes for New Nuclear Power Plants During Construction*, Revision 3. This guideline is the result of extensive public interactions between the industry and NRC staff to establish a framework for consistent, effective corrective action processes during new plant construction and associated NRC inspections. We appreciate the substantial time and effort by the staff in the review of this industry guideline. Considering the importance of effective corrective action processes to the success of new nuclear construction projects and the lack of guidance in this area, we believe these industry and NRC efforts have been well placed.

The staff provided their final comments on draft Revision 3 on December 29, 2009, and we discussed resolution of the NRC comments in a public meeting on January 15. Key understandings were reached during this meeting regarding "work processes" that will be used during construction. In particular, there is a common understanding that these work processes will contain the basic corrective action process elements necessary to ensure 1) that conditions adverse to quality (CAQ) are identified, corrected, documented and trended, and 2) that significant CAQ receive further evaluation and are subject to cause analysis and other additional corrective action process elements in accordance with their significance. Importantly, this fundamental principle applies regardless of how a licensee chooses to structure corrective action processes for a particular project. Appropriate clarifications have been made to the definition of "work processes" and elsewhere in the final guideline to underscore these understandings.

Subject to review of the changes reflected in Revision 3, we understand that the NRC will provide a letter back to NEI documenting the results of the NRC staff review. Based on the understandings

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reached on January 15, we expect this letter will indicate that the guidance in NEI 08-02, Revision 3, is consistent with NRC requirements and is acceptable for use. Such a letter would support and affirm ongoing licensee actions and plans to use this industry guideline as the basis for establishing plant-specific corrective action processes, programs and procedures. In the longer term, we agreed that more robust NRC endorsement in a Regulatory Guide is desirable and appropriate. We understand that the NRC plans to consider endorsing NEI 08-02 in a Regulatory Guide after the industry and the NRC gain some initial experience in its use.

We have attached both clean and redline versions of NEI 08-02 to facilitate the staff's review of Revision 3. In addition, we have attached a roadmap indicating how each of the NRC's December 29 comments was addressed.

If you have any questions, please contact me or Jim Fisicaro (202-739-8018; jjf@nei.org).

Sincerely,



Russell J. Bell

Attachments

C: Mr. Jose Jimenez, U.S. Nuclear Regulatory Commission
Mr. William Burton, U.S. Nuclear Regulatory Commission
Mr. Timothy Frye, U.S. Nuclear Regulatory Commission
NRC Document Control Desk