



Changes During Construction

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Background Information:

- NEI correspondence dated 19 May 2010 stated they are developing a document similar to NEI 96-07 to provide guidance on implementing the Part 52 change control processes.
- Initial priority on extent of implementation activities that may be performed prior to approval of a requested license amendment.
- NRC created a working group to interact with nuclear industry representatives and prepare recommendations and guidance for evaluating changes to the licensing basis during construction.

Present Status Problem Statement #1

Determine the activities that can be performed by licensees during construction while the NRC is reviewing requested changes to the licensing basis (license amendments).

- WG recommendation for problem statement #1 is to use the definition of construction in 10 CFR 50.10(a) in conjunction with the change process in 10 CFR 52.98 to determine the activities that may be performed during construction while a license amendment request is pending. Specifically, those activities that are “not construction” under 50.10(a)(2) could be performed by the licensee without assurance of approval of the amendment request by the NRC. Those activities include design work for the proposed change, procurement of components, and partial assembly of the system away from the final, in-place location.



Present Status Problem Statement #2

Determine if changes should be recommended for the NRC's enforcement policy to provide for enforcement discretion during new plant construction.

- Working Group personnel will review and evaluate enforcement discretion options available for new nuclear facilities construction

Present Status Problem Statement #3

Determine for new plants what revisions to the risk-informed guidance for evaluating changes to the licensing basis should be required and determine the applicability of the 10 CFR 50.59 guidance (NEI 96-07, rev 1).

- Risk informed guidance – work in progress
 - Development of anticipated changes during construction

- Applicability of NEI 96-07 – work in progress
 - Applicability determination criteria
 - Screening criteria
 - Work task flow charting

Present Status Problem Statement #4

Establish guidance that should be used for evaluating changes to the severe accident design features (VIII.B.5.c) of each design certification rule (construction & operation).

- Internal workshop on severe accident design features changes, definition of substantial increase – work in progress

Next Steps

Continue dialog and interactions with the public and industry stakeholders on changes during construction

- Review revisions of NEI 96-07 as received
- Compile and parse examples of anticipated changes during construction
- Approximately every 6 weeks the working group will participate in the Construction Inspection Program (CIP) public meetings