

## Industry comment on RIS-2008-05, Revision 1

The NRC invited stakeholder comment on draft RIS-2008-05, *Lessons Learned to Improve ITAAC*, Revision 1, on July 20. To follow-up the industry comment at the August 19 Construction Inspection Program public meeting, we recommend the following changes to Bullet 5 under *ITAAC Inspection Focus, Logic and Practicality*:

- Applicants should develop ITAAC that **specify the construction activity will be completed successfully rather than specifying that the construction records will be reviewed**. ~~require direct inspection of construction as it occurs, rather than review of postconstruction records.~~ For example, a design commitment that indicates certain buildings are constructed of reinforced concrete or are prestressed is inconsistent with an ITA that specifies an inspection of the construction records. ~~The ITA should be an~~ **licensee's inspection should verify** the actual construction to ensure the use of reinforced concrete or prestressing as required. ITAAC inspections **by licensees** are intended to physically confirm the attribute being checked **and should not focus solely on inspection of documentation**. ~~An inspection of documentation is actually a record check, not a physical verification of the SSC attributes of concern.~~ **ITAAC inspections of construction activities may be documented via work package documentation in accordance with the licensee's Quality Assurance Program, and such records are expected to be included in the ITAAC completion package.**

### Basis:

We believe the change to the first sentence accurately captures the intent of the NRC staff and our common understanding with the NRC regarding the need for ITAAC to focus on the adequacy of the contraction activity itself, not underlying records. The term "direct inspection" is not defined and is most often used in the context of NRC inspection of "targeted" ITAAC. As used here in the draft RIS, we believe that term could be misconstrued in the future. In any event, use of the term is not needed to make the staff's point.

Other suggested changes and additions are recommended consistent with this primary comment and to clarify the expected documentation of licensee ITAAC inspections of construction activities.