

Comment Resolution Summary

Resolution of Comments for IMC 2501 - Construction Inspection Program: Early Site Permit (ESP)

[07/07/2010 & 12/23/2010] – Regional and DSER comments provided to NRO
[1/10/11] – CQV revisions incorporated

Source	Comment	Added	Remarks
Title			
Title RIII	Title does not agree with scope of PURPOSE paragraph 2501-01. Recommendation “CONSTRUCTION INSPECTION PROGRAM EARLY SITE PERMIT (ESP) and GEOTECHNICAL AND SITE CHARACTERIZATION ACTIVITIES ASSOCIATED WITH ESP OR COMBINED LICENSE (COL) APPLICATIONS ”	No	Guidance is adequate as stated. Geotechnical and site characteristic activities are associated with ESP applications and not with COL
RII	The title of this document should include the word audit, not include inspection	No	Guidance is adequate as stated This IMC applies after an application is docketed hence inspection. The term “audit” is deleted from this IMC. Title consistent with other IMCs.
RIV	Revise title to incorporate <u>auditing</u> of activities during the early site permit phase.	No	See item above for response to similar comment.
Section 01			
2501-01 RIII	To be consistent with 02.02 and the Recommended title Change “or” to and To provide... (ESP) applications and geotechnical and site	No	Revised “Purpose,” for consistency with IMC 0040 and other IMCs Added 01.02 for consistency with the Objective of the IMC
2501-01 RII	2501-01 - “...associated with a COL application...” Why mention COL? This IMC is supposed to be about ESP applicants. Was it intended here to say ESP or COL application?	Yes	Revision made to address the comment. Deleted the term “COL” from the IMC
2501-01 RIII	ACRONYM USED -> COL first time without defining Recommendation should read Combined License (COL)	Yes	Acronym “COL” deleted

Source	Comment	Added	Remarks
2501-01 RIII	To be consistent with 02.02 Recommendation add words To provide... activities associated with an ESP or a Combined License (COL) application.	No	Deleted the word and definition of "COL"
2501-01 RII	Section 1 - Purpose mentions geotech activities associated with COL application. Should that be under IMC 2501? The draft of IMC 2502 includes steps for geotech.	No	Geotech activities are associated with ESP. IMC 2502 provides a link to IMC 2501
2501-01 RII	Why are the purpose sections slightly reworded between 2501 and 2502?	Yes	Revision made to address the comment. Revised "Purpose" section for consistency with IMC 2502
2501-01 RII	The format of the purpose sections in 2501 and 2502 are different than the balance of the 2500 series. Why?	Yes	Revision made to address the comment Format of "Purpose" revised to be consistent with other IMCs
2501-01 RIV	Revise this section to describe auditing of early site permit activities not inspections. Consistent with MC 0040, the Purpose section should be revised to address specific audit elements.	No	Guidance is adequate as stated Audits deleted, because there is no regulatory basis to audit prior to docketing an ESP application
Section 02			
2501-02 RII	Objective section in 2501, 2502, 2507, and 2508 has similar QA objectives. Why are they not worded similarly?	Yes	Revision made to address comment. Objective section revised to be consistent with other IMCs
2501-02 RIV	Consistent with the requirements of MC0040, revise the document to include an Applicability section.	No	Guidance is adequate as stated, because per IMC 0040, the section on "applicability" is optional
02.01 & 02.02 RIII	Section 2501-02, specifically 02.01. Suggest making this objective two objectives, vice one, since there are two different thoughts contained here and an incomplete sentence with both. In addition, Section 02.02 would be renumbered 02.03:	No	Guidance is adequate as stated, See response to 2501-02 RII comment above

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	02.01 To verify effective implementation of the quality assurance (QA) program, as described in the application for an ESP. 02.02 To provide reasonable assurance of the integrity and reliability of the ESP data or analyses that would affect the performance of safety-related systems, structures, and components (SSCs).		
02.02 RIV	The objective related to early evaluation and review of design engineering was deleted. Given the importance of these activities it is strongly recommended that this section be revised to include the verification of effective design engineering program.	No	Not applicable to IMC 2501 but was deleted from IMC 2502
Section 03			
03.01 RIII	Defined ACRONYM quality assurance (QA) Twice Acronym previously defined in 02.01 Recommendation should read QA program	No	Deleted subsection 03.01,"Audit"
03.01 RIII	Section 03.01, "Audit": end the first sentence after the phrase, "and other applicable documents." Begin a new sentence stating, "The activity will also verify the effectiveness of implementation...."	No	Deleted subsection 03.01,"Audit" Renumbered 2501-03
03.04 RIII	From the definition in 10 CFR Part 52 the correct wording is A Commission approval, issued under subpart A of ...	Yes	Revision made to address the comment. Revised "ESP" definition consistent with 10 CFR Part 52 definition
03.04 RIII	Section 03.04, "ESP": reword first sentence to read, "A Commission approval approved permit, issued pursuant to subpart A of 10 CFR Part 52, for a site or sites for with one or more nuclear power facilities."	No	See item above for response to this comment
	The second sentence is does not	No	Definition of ESP reworded

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03.04 RIII	completely and accurately define subpart A – Early Site Permit. A close reading of section 52.17 shows (a) (1) A site safety analysis report (2) A complete environmental report... (3) Emergency Plans ... and (4) Under paragraphs (b)(1) and (b)(2) (i)... Federal, State, and local governments... My recommendation is “Such a permit addresses, as a minimum, site suitability issues, environmental issues, emergency plan issues and Federal, state and local government certification issues.”		consistent with 10 CFR Part 52 definition
03.04 RIII	Section 03.04, “ESP”: reword the end of the second sentence to read “unique to that site, which could pose a significant impediment...”	No	Guidance is adequate as stated ESP reworded for consistency with 10 CFR Part 52 definition
Various RIV	Several of the definitions in this section (i.e., Audit, COL, Inspection, & Violation) are inconsistent with other IMCs and the Enforcement Manual. Suggest revising these definitions to maintain consistency.	Yes	Revised the definition of “contractor” to be consistent with IMC 2502, 2503, 2505 and IMC 0613 & IMC 0614; Deleted the term Audit and COL
Various RII	Why are the definitions in this IMC different than the definition of the same terms in other IMC? Audit – different in 2505, 2508 COL – different in 2050 Contractor – different in 2503, MC0613, 2508 Inspection – different in 2503, 2505, IMC 0613, Non-Conformance – different in 2508	Yes	Deleted the term “Audit” and “COL” as they do not apply to this IP Revision made to address the comment. Revised “Contractor” definition for consistency with IMC 0613 & IMC 2505, with the exception the term “licensee” is replaced by “applicant or permit holder” Definition of “Inspection” is consistent with IMC 2502 & 2508 Nonconformance is consistent.
03.16 RII	The definition of Violation in this IMC is not consistent with the Enforcement Manual.	Yes	Revision made to address the comment. Revised definition of “Violation” for consistency with the NRC’s Enforcement Manual
03.05	Definition of Inspection was lifted from the definition from 2508 and does not	No	Definition of “Inspection” is consistent with IMC 2502 and

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RII	appear to be correct.		2508
03.05 RIII	<p>Seciton 03.05, "Inspection" Consider the following:</p> <p>"An NRC planned and documented activity performed during the review of the application (once docketed post-docketing) to determine, by investigation, examination, or evaluation of objective evidence, the adequacy of and compliance with established procedures, instructions, drawings, and other applicable documents, and in order to verify effective implementation of the QA program."</p>	No	See response to comment from RII on 03.05 above
03.06 RIII	<p>Seciton 03.06, "NonConformance" currently reads: "A vendor's failure to meet contract requirements related to NRC-regulated activities (e.g., Appendix B to 10 CFR Part 50), where the NRC has not placed requirements directly on the vendor. "</p> <p>To be consistent with the Enforcement Policy language and the prior definition of contractor, which includes vendors, consider revising to the following:</p> <p>"A contractor's failure to meet commitments which have not been made legally binding requirements by the NRC. An example is a contractor's failure to implement a commitment made in a procurement contract with an applicant or licensee as required by Appendix B to 10 CFR Part 50."</p>	No	Definition of "Nonconformance" is consistent with the NRC's Enforcement Manual
03.03 RII	Definition of Contractor uses applicant. When this procedure is in effect the ESP holder is NOT an applicant.	No	Prior to issuing an ESP, the entity docketing a ESP application is an applicant, and after ESP issuance is a "permit holder," hence term "applicant" is used along with the term "permit holder," in definition of Contractor
03.06 RIII	Section 03.06 describes non-conformance. If the licensee's contract requirements are above and beyond the NRC requirements, would that still be a non-conformance in our point of view?	No	A contractor failing to meet requirements of Criterion VII, of Appendix B to 10 CFR Part 50 result in issuance of nonconformances

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03.07 RIII	The second sentence needs additional information. My recommendation is "Standard Review Plan ... New License Applicants," defines the applicability and limitations for each unique Quality Assurance Program Description submitted specifically for either a Design Certification, ESP, Construction Permit (CP), COL or a Operating License (OL) application.	No	Guidance is consistent as stated. Title is consistent with NUREG-0800 SRP Section 17.5, "Quality Assurance Program Description- Design Certification, Early Site Permit, and New License Applicants"
03.07 & 03.08 RII	Section 3 - Suggest deleting the definitions 03.07 & 03.08. These are fairly self explanatory terms. I made similar comment on IMC 2502.	No	Guidance is consistent as stated, because definitions provided clarification. The term "NRC QA Guidance," revised to maintain consistency with the title of SRP Section 17.5" by deleting the last word, "design certification"
03.10 RIII	To address different terms used by different licensees recommendation <u>Quality Assurance Manual or Quality Assurance Topical Report.</u>	No	Guidance is consistent as stated Definition consistent with other IMCs
03.12 RIII	Section 03.12 should specify "Appendix B of 10 CFR Part 50" instead of just "Appendix B."	Yes	Added the term "of 10 CFR Part 50"
Section 04			
2501-04 RIV	There are several inconsistencies in the responsibilities section and the other IMCs. Suggest revising this section to maintain consistency.	No	Responsibilities are consistent with IMC 2501 & IMC 2502, IMC 2507, with the exception IMC 2507 does not have responsibilities for Deputy Regional Administrator for Construction Revised 04.02. a. to be consistent with other IMCs
2501-04 RII	The responsibilities sections are not consistent between IMC 2501 and 2502. Is there a reason for the difference in wording? There are also wording difference between the same responsibilities in 2501, 2502, 2504, 2505, 2507, 2508 and IMC 0613.	Yes	Revised 04.02.a., responsibilities for DCIP director to be consistent with IMC 2502 by adding "associated with new reactor construction pursuant to 10 CFR Part 52" Note: Responsibilities in IMC 2507 and 2508 needs to be revised to be consistent with

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			IMC 2501 and 2502
04.02 RIII	The correct title for Director is <u>Director, Division of Construction Inspection (DCI)</u>	NO	Guidance is consistent as stated Acronym "DCIP" is consistent
Section 05			
2501-05 RIII	Delete first sentence because it is inconsistent with geotechnical activities Recommendation The NRC will implement this IMC to: (1) assess the applicant's implementation of its QA program for activities performed prior to and during the ESP application development process and (2) to audit and assess the applicant's performance of geotechnical and site characterization activities in preparation for construction of a nuclear power facility either with a ESP or COL application submitted under 10 CFR Part 52. Where....	No	Added section 05.01 General" for consistency with formats of other IMCs Revised the entire paragraph for consistency with IMC 2502
2501-05 RII	The discussion portion of this IMC section 2501-5 is the Applicability section of other IMC's. Should make this consistent.	No	Guidance is consistent as stated because "Applicability" is optional in IMC 0040
Section 06			
06.03 RII	06.03 - Suggest deleting this as these steps are inspector knowledge/behavior and are really better suited for an IP than an IMC. I made similar comment on IMC 2502.	No	Section 06.02 deleted and renumbered IMC with old 06.03 to 06.02 Guidance is consistent as stated Provides guidance
06.03 a	Under Section 06.03.a, the first sentence of the second paragraph should be deleted (To generate an inspection plan). The information is repeated in the first paragraph.	Yes	Deleted the first sentence in 06.03.a.(new 06.02.a)
06.03 a RIII	06.03.a "Pre-inspection/audit activities" Consider adding the following sentences to the second paragraph, prior to the last sentence. Also delete the first sentence, as it merely restates the last sentence of	No	Deleted first sentence and rewording second sentence Added "including open unresolved items," to first

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	<p>the previous paragraph.</p> <p>“The audit or inspection plan will identify the applicant and describe the scope and major areas of emphasis that will be reviewed, evaluated, or assessed, including open unresolved items. The plan should also have provisions for the lead inspector to initiate discussions with the applicant management or its representative to discuss logistical matters well in advance of the audit or inspection (i.e., major areas of inspection, team size, team accommodations, and/or specialized site-specific training). In addition, this initial contact by the lead inspector should establish preliminary entrance and exit meetings with the applicant management or its representative.”</p>		sentence
06.03 b RIII	Under Section 06.03.b, supervisor briefing of the preliminary findings should not be optional.	Yes	Guidance is consistent as stated Reworded sentence
06.03 b RIII	06.03.b, “Onsite inspection/audit activities”: delete the first sentence based on addition of the comment and incorporation of this sentence into section 06.03.a.	No	New number 06.02.b Comment not considered because guidance is consistent as stated and is consistent with IMC 2502
06.03 b RIII	<p>06.03.b, “Onsite inspection/audit activities” Consider the following changes:</p> <p>“An exit meeting should be conducted at the conclusion of the audit or inspection. The results of the audit or inspection, including preliminary findings, violations or nonconformances, should be presented emphasizing their impact on safety. The lead inspector should emphasize that preliminary findings, violations or nonconformances are always subject to management review before they are documented in an inspection or audit report. Prior to the exit, the lead inspector should determine whether brief his/her supervisor should</p>	No	Guidance is consistent as stated, because the term preliminary findings include potential violations or nonconformances

Source	Comment	Added	Remarks
	be briefed, if possible, on the preliminary inspection findings inspection or audit results.”		
06.03 c. RIII	The correct title for IMC-0617, is “Vendor Inspection Reports”	No	Changed title of IMC-0617 for consistency with current revision Added a new subparagraph 06.02.c
06.03 c RIII.	It is unclear whether Inspection Reports for activities at a licensee may be adequately covered by IMC-0617 ,”Vendor Inspection Reports” There is a distinction between a vendor and a licensee. If you want to use IMC-0617 as guidance for ESP inspection reports, it appears IMC-0617 would need additional wording to clarify that IMC-0617 covers IMC-2501 activities. I recognize IMC-0613, Documenting 10 CFR 52 Construction and Test Inspections appears to be the governing Inspection Report Document later on in the process COL.	No	IMC 0617 was revised to include documentation of QA implementation inspection reports
06.03 c RII	This Section identifies that an unresolved item will be opened for “Issues that cannot be resolved at the time of the audit or inspection.” Suggest - Adding a specific definition of an Unresolved Item. Note that if you leave this as written, it provides unlimited latitude for creating URIs and is not the same as that defined in IMC 0612 nor IMC 0617. Suggest – Adding guidance that specifies that URI’s, violations or deviations are required to be reviewed and closed prior to the staff issuing an SER for the COL to ensure safety issues are resolved	No	Removed reference to URI in IMC
06.03 c RIII	06.03.c, “Post-inspection/audit reviews”: consider the following changes Audits reports will be issued as required by IMC-0614, "Documenting 10 CFR Part 52 Construction Audit Activities. "Inspection reports will be issued as required by IMC-0617," Vendor and	No	Renumbered to 06.02.d Title changed to “Inspection Documentation” Deleted audit activity throughout this IMC

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	Quality Assurance Implementation Inspection Reports. Issues that cannot be resolved at the time of the audit or inspection will be documented as unresolved items. Potential violations or nonconformances identified through inspection activities will be processed in accordance with the NRC's Enforcement Policy.		
06.04 RIII	Under Section 06.04, the title should be "Inspection of an Application by a Previously Inspected Applicant," to avoid the confusion of re-inspecting the same application.	No	Renumbered to 06.03 Guidance is adequate as stated
06.04 RIII	06.04 "Inspection/Audit of a Previously Submitted Application": consider the following change to the last sentence, based on the wording of Section 07.01 "The reductions in inspection scope will be determined on a case by case basis by agreement between NRO and Region II the designated regional office. "	No	New number 06.03 Revised last sentence by deleting "by agreement between NRO and Region II" and made it consistent with IMC 2502
Section 07			
07.01 RII	Section 07.01 - suggest replace the phrase "designated regional office" and "lead region" with Region II Center for Construction Inspection since in the current NRC organization CCI is the designated regional office. There is another "lead region" phrase in section 07.04 A similar change should be made in IMC 2502.	No	Section 07.01 modified by deleting second sentence; Incorporating DSER comments and revised last sentence making it consistent with IMC 2506. No change in section 07.04, maintaining consistency with IMC 2506
07.01 RIII	07.01, third paragraph, last sentence, consider the following: "Early involvement of NRC staff will facilitate and support prompt identification and resolution of issues, and timely completion of the acceptance review process following submission of the application."	No	Removed last sentence, because there is no pre-ESP inspection activity
07.02 RIII	For completeness add words on end of second sentence	No	Section 07.02 "QA Program Reviews" deleted

Source	Comment	Added	Remarks
	The staff review and issuance of an SER covering ESP activities.		Sections re-numbered
07.03 RII	Section 07.03 is apparently being removed to eliminate a pre-application audit. There is no explanation in Attachment 2 as to why this is being done. The original thinking behind the pre-application audit was that the NRC should look at what QA was being applied to the process for constructing the application to ensure its accuracy. Why has that been determined not to be a good idea? Also if 07.03 is removed need to renumber the following sections.	No	Guidance is adequate as stated, because there is no regulatory basis to perform pre-application audits by CQV staff Sections re-numbered
07.04 RIII	Because 07.03 paragraph was entirely deleted. Recommendation this paragraph should now be labeled as 07.03	Yes	Section re-numbered to 07.02
07.04 RII	Section 07.04 - The sentence "This objective is consistent with regulations that govern all stages of the licensing process." Is unclear. Suggest delete it. The meaning of the phrase "...and to support the staff's SER input " is unclear. This inspection is being conducted after the SER has already been issued. Suggest delete the phrase or change "support" to "verify the accuracy" if that is what is intended.	No	Renumbered to 07.02 Guidance is adequate as stated to maintain consistency with IMC 2502 This inspection is performed during the review of the application to support SER input prior to SER is issued
07.04 RIII	Under Section 07.04, it should clearly state "10 CFR Part 50 Appendix B."	Yes	Revision made to address comment "10 CFR Part 50 Appendix B" added
07.04 RIII	07.04 "Post-Docketing Inspection" Numbering should be changed to 07.03 based on the deletion of Section 07.03 during the last revision.	Yes	Revision made to address comment
07.04 RIII	07.04 "Post-Docketing Inspection": Second sentence appears to be directing the staff to direct the licensee to do something other than what is normally required. Consider removal or rewording. For rewording consider:	No	Comment was reference to 2 nd sentence in section 07.02 – "QA Program reviews" which is now deleted

Source	Comment	Added	Remarks
	<p>“The applicant should be informed that early submittal of the quality assurance topical report (QATR) or quality assurance program description (QAPD) for staff review is necessary for the timely issuance of an SER.”</p>		
<p>0.7.04 RIII</p>	<p>07.04 “Post Docketing Inspection” Consider adding the following, since Section 2501-08 references 10 CFR 21 inspections post-docket, the acronym IP is not previously defined and IP 36100 is not mentioned in this IMC, but the other two IP’s are:</p> <p>“Inspection Procedures (IP) 35017, “Quality Assurance Implementation Inspection,” and IP 36100, “Inspection of 10 CFR Part 21 and 50.55(e) Programs for Reporting Defects and Nonconformance,” will be used as guidance for conducting this inspection. After the NRC staff approves the applicant’s QA program and issues an SER, the NRC will inspect the applicant’s implementation of its QA Program, in a risk-informed, performance-based manner. This objective is consistent with regulations that govern all stages of the licensing process. Assigned NRC inspectors will verify whether activities affecting quality are conducted under the appropriate provisions of Appendix B of 10 CFR Part 50 and 10 CFR Part 21.”</p>	<p>Yes</p>	<p>Renumbered to 07.02 Revision made to address comment. Defined acronym “IP” and added IP 36100 This section revised for consistency with IMC 2502</p>
Section 08			
<p>2501-08 RII</p>	<p>Section 8 - “During the post-docketing phase, the applicant will be subject to 10 CFR Part 21 and Appendix B to 10 CFR Part 50 requirements and may be subject to enforcement actions.” Why does docketing make an applicant subject to Appendix B? If there is a reason perhaps we should try to present it in this section.</p>	<p>No</p>	<p>Guidance is adequate as stated 10 CFR 52.17, “Content of application- Technical requirements, § 52.17a.(ix) requires the applicant establish a QA program that meets the requirements of Appendix B to 10 CFR Part 50.</p>
<p>2501-08</p>	<p>Under Section 08, it should clearly state</p>	<p>Yes</p>	<p>Revision made to address</p>

Source	Comment	Added	Remarks
RIII	"10 CFR Part 50 Appendix B."		comment Added "10 CFR Part 50 Appendix B"
2501-08 RII	The enforcement actions section should refer to the Enforcement Policy. This procedure does not set enforcement policy or guidelines.	Yes	Revision made to address comment. "the Enforcement Policy" added
2501-08 RIV	Revise the Enforcement Actions section to refer to the NRC's Enforcement Policy.	Yes	Revision made to address comment. Section reworded to maintain consistency with the Enforcement Policy and Enforcement Manual
2501-08 RIII	2501-08, "Enforcement Actions" Consider the following wording changes to maintain consistency with the Enforcement Policy and Manual: "Possible enforcement actions associated with an ESP application are not anticipated in the pre-docketing application phase. However, the information submitted with the application will become subject to NRC regulations and the Enforcement Policy , including enforcement actions for violations that involve willfulness or impact the regulatory process (i.e., willful wrongdoing, or incomplete or inaccurate information) . During the post-docketing phase, the applicant and contractor will be subject to 10 CFR Part 21 and Appendix B requirements, and may also be subject to enforcement actions, such as a notices of violation and or nonconformance." May also want to consider deleting the last portion of the sentence "such as a notice of violation or nonconformance" in its entirety.	No	See item above for changes made to 2501-08 RIV. Recommendations not considered
RIII	Under Section 08, the first sentence and the third sentence are contradictory. The post-docketing phase is still part of the ESP application process.	No	Section reworded to maintain consistency with the Enforcement Policy and Enforcement Manual

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Section 09			
2501-09 RIII	Correct first REFERENCE to read U.S. Code of Federal Regulations. 10 CFR Part 52, " Licenses, Certifications and Approvals for Nuclear Power Plants, " " subpart A – Early Site Permits; subpart B – Standard Design Certifications; and subpart C – Combined Licenses for Nuclear Power Plants. "	Yes	Revision made to address comment. Revised title for consistency with 10 CFR Part 52
2501-09 RIII	Correct second REFERENCE to read U.S. Code of Federal Regulations. 10 CFR Part 50.55, "Conditions of Construction Permits, Early Site Permits, Combined Licenses, and Manufacturing Licenses. "	Yes	Revision made to address comment. 10 CFR 50.55 title revised for consistency with 10 CFR
2501-09 RIII	2501-09, "References" Consider adding IMC 0614, 0617, SRP 17.5 and the NRC Enforcement Policy, as all documents were referenced in this draft IMC.	Yes	Revision made to address comment. Reference documents added Added IMC 2506 due to new subparagraph added in section 06.02.c.
Other			
RII (C. Julian)	There are now several definitions that are not used in the text of the document e.g. tendered application. We shouldn't bother including definitions of words we don't actually use.	Yes	Revision made to address comment. Deleted the definition "tendered"
L. Mellen	Revision History format is inconsistent in 2501, 2502, 2503, 2505, 2507, 2508, and IMC 0613. It is left off of 2504	Yes	Revision made to address comment. Format corrected to maintain consistency with other IMCs
L. Mellen	Applicability section is not in the document. This is inconsistent with 2504 and 2505.	No	Per IMC 0040, "Applicability" section is "optional"
L. Mellen	Remove the word inspection from this	No	See item 3 on page 1

Source	Comment	Added	Remarks
	document. These are audits.		
L. Mellen	There are no vendor activities associated with the ESP. Please remove references.	No	Guidance is adequate as stated. Yes, contractors are used to perform activities associated with ESP. See definition for contractors
L. Mellen	The inspection activity described in 2501 section 7. should be in 2502 Only	No	IMC 2502 provides link to IMC 2501 for guidance to geotechnical and site exploration activities
RIII (RGK)	Ensure that changes adopted in IMC 2501 that are common to IMC 2502 are changed in IMC 2502, to ensure consistency between the two IMC's.	Yes	Changes adopted in IMC 2501 to maintain consistency with IMC 2502