



Changes During Construction ISG-025 and NEI 96-07 App C

November 15, 2011

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Changes During Construction ISG-025

November 15, 2011

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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.

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**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).

- Normal License Amendment Request Process (10 CFR 50.90)
- License Condition Process, Preliminary Amendment Request, an elective precursor to License Amendment Request, PAR/LAR
- CdC License Condition effective through the 103(g) finding
- Addresses Industry question of at risk plant change or modification to the licensing basis during the construction phase, NRC notification of no objection to proceeding with installation and testing
- Licensee guidance for requesting PARs contained in NEI 96-07 Appendix C, Section 4.7.1 in final draft stage

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**Present Status
ISG-025 (DRAFT)**

Modifications to Interim Staff Guidance ISG-025

- PAR – Preliminary Amendment Request
- Basis for determination of “no objection” review of a PAR
 - Date by which a PAR determination is requested
 - Description of the proposed change
 - No significant hazards consideration determination (50.92)
 - Categorical exclusion from environmental review (51.22(c))
 - Description of the impact on associated ITAAC (if any)

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**Present Status
ISG-025 (DRAFT)**

Modifications to Interim Staff Guidance ISG-025

- Review of the Description of the Impact on Associated ITAAC
 - The Construction Operations Engineer will review the ITAAC Impact Description provided in the PAR to ensure clarity and understanding of the proposed change on associated ITAAC. The Construction Operations Engineer will communicate with Region II/CCI as appropriate during the review.

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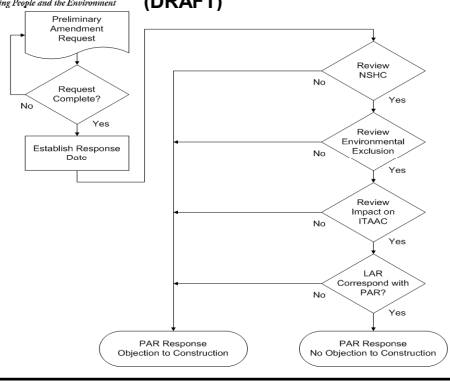
Present Status ISG-025 (DRAFT)

Modifications to Interim Staff Guidance ISG-025

- Related License Amendment or Exemption Request Review
- The NRC will not issue a determination on the PAR until the licensee submits the related LAR.
- The PM is responsible for ensuring the PAR request accurately reflects the plant change or modification addressed in the related license amendment or exemption request. During the construction phase, SSCs installed and tested on the basis of a PAR that do not correspond to the related license amendment or exemption request would distort the relationship between the physical as-built plant and the CLB of the facility, unnecessarily complicating inspection, verification and validation of the facility during construction.
- Basis for Denial under Related License Amendment or Exemption Request
 - PAR does not correspond accurately or technically with LAR
 - PAR technical scope exceeds the LAR technical scope, (inverse is acceptable)



ISG-25 PAR Evaluation Template (DRAFT)





Preliminary NEI 96-07 App C NRC Comments

November 15, 2011

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**Preliminary Comments
NEI 96-07**

NEI 96-07 Appendix C received October 2011

- Acceptability of the use of NEI 98-03, *Guidelines for Updating Final Safety Analysis Reports*, for plant-specific DCD
- Acceptability of the use of other more specific regulations for changes otherwise subject to Section VIII.B.5 of the design certification rules as is currently allowed for changes otherwise subject to 10 CFR 50.59 (per 50.59(c)(4))
- Equivalence of departure Summary Report content required by Section X.B.1 to that currently provided by licensees per 50.59(d)(2)
- The appropriate review process for the initial issuance of design documents and procedures by licensees
- Ensuring a clear understanding of change processes applicable to operational requirements after the COL is issued
- Feasibility of additional guidance on administrative Tier 1 departures without a LAR
- The role of configuration management versus change control processes during construction

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**Some early staff feedback on
revised NEI 96-07 Appendix C**

• **Section 4.4.2.3 Evaluation of Tier 2 Departures that Affect Ex-Vessel Severe Accident Design Features**
– incorporates staff's recommended changes per September 7, 2011 letter

• **Section 4.4.3.1 Changes to Probabilistic Risk Assessment (PRA) Information**
– appears to be consistent with existing regulatory guidance, staff continues to review
– Example 1 is an example of PRA maintenance, not upgrade per ASME/ANS PRA standard non-mandatory Appendix 1-A

• **Section 4.4.3.2 Changes to Other Severe Accident Information**
– useful addition
– however, cited example needs to be re-worked or need to provide a different example

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NEI 96-07 Appendix C (cont.)

• **Section 4.4.3.2 Example**
An ABWR plant makes a change to the Automatic Depressurization System (ADS), to decrease the capacity of the ADS pressure relief valves. As stated in Table 19E.2-29 in Tier 2 of the ABWR DCD, the ADS pressure relief valves help mitigate in-vessel severe accidents but not ex-vessel severe accidents. Additionally, the ADS pressure relief valves also act as safety relief valves (SRVs).

• **Above statement is true, however, additional discussion can be found in 19K.4 of ABWR DCD**

“The ADS depressurizes the RPV so that the low pressure systems can inject water. Even if no water injection is available, the depressurization via one safety/relief valve (SRV) eliminates the potential for direct containment heating in event of RPV failure”

• **Hence, need to evaluate per VIII.B.5.c for the impact on probability of ex-vessel severe accident previously reviewed and determined not credible**

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Next Steps

Continuing the final resolution phase of the CdC WG

Continue dialog and interactions with the public and industry stakeholders on Changes during Construction

- Issue ISG-025 for "Use and Comment", 75 day comment period
- NRC comments on NEI 96-07, Appendix C revision
