

NRC Oversight of Construction Activities

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10 CFR Part 50

Appendix B



- Criterion I: The applicant shall be responsible for the establishment and execution of the quality assurance program.
- Criterion VII: Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

Inspection Program



- IMC 2502
 - Applicant: Pre-COL
- IMC 2503
 - Licensee: COL or LWA
- IMC 2504
 - Construction and Operational Programs
- IMC 2507
 - Vendor Inspections

ITAAC Inspections

- IMC 2502 & IMC 2503
 - Inspections to support the Commission’s determination, in accordance with 10 CFR 52.103(g), that the acceptance criteria in the combined license have been met.
 - Inspection focus on licensee oversight of quality activities.
 - Inspection conducted by RII/CC Staff with HQ support.
 - Violations will be cited against applicant/licensee.

Vendor Inspection

- IMC 2507
 - Inspections of vendors with generic applicability to multiple licensees to verify effective implementation of QA programs.
 - Supports the Commission determination that the acceptance criteria in a combined license are met in accordance with 10 CFR 52.99 and 10 CFR 52.103(g).
 - Inspection conducted by Vendor Branches with support from RII/CCI Staff.
 - Violations & NONs will be cited against Vendor.

Vendor and ITAAC Inspection Interface



- If during the conduct of an ITAAC or Programmatic Inspection, potential significant issues are identified specific to a particular vendor, a Vendor Inspection may be initiated.
- Conversely, if during a Vendor Inspection, potential issues with licensee oversight are identified, an appropriate additional inspection may be initiated.

Examples

- Environmental Qualification Testing for a design center component (e.g. squib valve).
 - Vendor Inspection under IMC 2507.
 - Violations & NONs will be cited against Vendor.
- ITAAC Inspection at a vendor facility (e.g. SMS) or vendor work on-site (e.g. CB&I containment welding).
 - ITAAC Inspection under IMC 2503.
 - Violations will be cited against licensee.

Conclusion

- There's no substitute for effective licensee oversight.
 - **Licensees will continue to be held responsible for the quality of work performed for them by vendors.**
- The conduct of a licensee based inspection could lead to the initiation of a vendor inspection.