

4.1.1 Construction Change Applicability

During the construction of a nuclear plant (in-place assembly, erection, fabrication, or testing for specified SSCs), numerous changes to the plant design may be identified. These construction changes could result from unanticipated differences between detailed design specifications and drawings and the as-built conditions encountered during design reconciliation, inspections, testing, walk-downs and other design verification activities. These construction changes are controlled under 10 CFR Part 50, Appendix B, Criterion III, Design Control, and other provisions of Appendix B, and are managed by field change or engineering change processes.

In contrast to construction under a 10 CFR Part 50 construction permit, construction under a Part 52 COL requires that the construction be conducted in accordance with the COL and the current licensing basis (CLB). Consequently, in addition to the requirements of 10 CFR Part 50, Appendix B, Part 52 licensees should review construction changes for impacts on the CLB, and make necessary updates to the UFSAR and request a license amendment from the NRC, as appropriate.

Construction changes generally affect detailed design information and do not affect the CLB directly or require an LAR. Appendix B processes may be used to manage such construction changes throughout the construction phase. When design verification activities identify a difference between the as-built condition and the CLB, the difference should be assessed as a change/departure in accordance with the remainder of this appendix.

Licensees should also review construction changes for impact on ITAAC-related SSCs and assess the need to submit a Supplemental ITAAC Closure Letter in accordance with 10 CFR 52.99(c)(2) and NEI 08-01.

When the licensee transitions to the operational phase following the 10 CFR 52.103(g) finding, licensees should apply the Part 52 change processes in accordance with this appendix, as well as 10 CFR Part 50, Appendix B, to changes/departures identified thereafter.