

Construction Inspection Program Finding Screening and Tracking

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Construction Inspection Program

Baseline Inspection Program

The overall objectives of the baseline inspection program are:

- to provide a sufficient basis to support the Commission determination, in accordance with 10 CFR 52.103(g), that the acceptance criteria in a combined license have been met; and
- to develop confidence in the licensee's programmatic controls.

The baseline inspection program consists of inspections in the following areas:

- ITAAC-Related Work Inspections
- Construction Program Inspections (including Pre-op Testing Inspections)
- Operational Program Inspections

CIP Finding Screening Process

- The finding screening process is in IMC 0613P, Appendix B
- Issues will be screened to determine if a construction inspection program finding and/or a traditional enforcement violations exists
- 3 figures are provided to assist in the screening process
- The screening process basically consists of the steps on the next page

Basic Finding screening steps

- Identify Issue of Concern
- Determine if a performance deficiency (PD) exists
- Determine if PD is more than minor (finding exists)
- Determine the significance of the finding using construction SDP
- Determine the type of finding (ITAAC finding, etc) and its significance
- Determine identification credit (NRC, self-revealing, or licensee)
- Document in accordance with IMC 0613P

CIP Finding Screening Process - Terms

- Issue of Concern. An inspection result that is dispositioned in accordance with the guidance in IMC 0613P
- Performance Deficiency. An issue that is the result of a licensee not meeting a requirement or standard where the cause was reasonably within the licensee's ability to foresee and correct, and therefore should have been prevented. A performance deficiency can exist if a licensee fails to meet a self-imposed standard or a standard required by regulation, thus a performance deficiency may exist independently of whether a regulatory requirement was violated.
- Finding. A performance deficiency of more than minor significance. A finding may or may not be associated with a regulatory non-compliance and, therefore, may or may not result in a violation. Examples of findings include a Programmatic Finding or a Technical Finding.

CIP Finding Screening Process - Terms

- Programmatic finding. A finding involving inadequate requirements intended to ensure a *critical attribute of a construction or operational program is met*.
- Technical finding. A finding that is not a programmatic finding. Construction findings and ITAAC findings are examples of technical findings.
 - ITAAC finding is a technical finding that is associated with a specific ITAAC and is material to the ITAAC acceptance criteria.
 - Construction finding is a technical finding that is not associated with a specific ITAAC and/or is not material to the ITAAC acceptance criteria.
- Program critical attribute. An element of a program that is established to ensure that a regulatory requirement is met. Program descriptions are contained in the final safety analysis report.

Finding Examples

- Example of a programmatic finding
 - A licensee does not include a requirement in its corrective action program to promptly identify and correct conditions adverse to quality (10 CFR Part 50, Appendix B, Criteria XVI requirement)
- Example of a technical finding
 - A licensee specifies the use of the wrong welding rod material for welding on several different components

Finding Examples

- In the programmatic finding example, the significance of the finding would be determined using the programmatic finding flow chart; however, unless there is a failure to correct a condition adverse to quality that is relevant to the acceptance criteria of a given ITAAC, this finding would not form the basis for an NRC determination that an ITAAC has not been met.
- In the technical finding example, the significance of the finding would be determined using the construction SDP matrix; if the welding rod material is not acceptable for a component that is material to the acceptance criteria of an ITAAC, then this finding could form the basis for an NRC determination that an ITAAC has not been met.

CIP Finding Screening Process – NRC Identified

- NRC-Identified findings are those that are found by NRC inspectors that the licensee was not previously aware of or had not been previously documented in the licensee's corrective action program.
- NRC-identified findings also include previously documented licensee findings to which the inspector has significantly added value.

CIP Finding Screening Process – Self Revealing

- Self-revealing findings are those that become self-evident and require no active and deliberate observation by the licensee or NRC inspectors to determine whether a change in process or equipment capability or function has occurred.
- Self-revealing findings become readily apparent to either NRC or licensee personnel through a readily detectable degradation in the material condition, capability, or functionality of equipment and require minimal analysis to detect.
- Some examples of self-revealing findings include failure of equipment or instrumentation to operate properly during testing that was not related to the purpose of the test (e.g., inadequate foreign material controls cause the failure) and violation of radiography exclusion area requirements that are subsequently identified through an electronic dosimeter alarm.

CIP Finding Screening Process – Licensee Identified

- Licensee-identified findings are those findings that are not NRC-identified or self-revealing. Most, but not all, licensee-identified findings are discovered through a licensee program or process.
- Licensee-identified findings can be material to the acceptance criteria in an ITAAC and therefore, be an ITAAC finding

Finding Documentation

- NRC and self-revealing findings must be documented using the four part format (introduction, description, analysis, and enforcement).
- Licensee-identified violations that are of very low significance (Green) for which appropriate corrective actions have been developed should only be minimally documented.
- Consistent with the objective of the Enforcement Policy to encourage licensee identification and correction of violations
- If the licensee-identified finding has been screened and found to be potentially greater than Green it must be documented using four part format.

Finding Tracking

- All NRC-identified and self-revealing findings (FINs), violations (VIOs), and non-cited violations (NCVs), as well as apparent violations (AV) and unresolved items (URIs) must be assigned a sequential tracking number.
- Although not currently required, the staff is considering adding a requirement to assign a sequential tracking number to licensee-identified findings
- The report shall include a quick reference list of items opened, closed, and updated, including the item type, the tracking number for the item, and the item title.
- Findings associated with NCVs will normally be opened and closed in the initiating inspection report.