

NRC INSPECTION MANUAL

QVIB

INSPECTION PROCEDURE 70702

PART 52, INSPECTION OF PREOPERATIONAL TEST PERFORMANCE

PROGRAM APPLICABILITY: 2504

70702-01 INSPECTION OBJECTIVES

- 01.01 To provide guidance for inspection of any type of preoperational test at a new nuclear power plant with a combined license (COL) in accordance with Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants," of Title 10 of the Code of Federal Regulations (10 CFR Part 52).
- 01.02 To ensure the preoperational tests are technically adequate to perform the testing as described in the Final Safety Analysis Report (FSAR), are adequately performed and documented in accordance with the procedure and program requirements, and that the test results demonstrate that the plant, procedures, and personnel are ready for safe operation.

70702-02 INSPECTION REQUIREMENTS

The Initial Test Program (ITP), described in section 14.2 of the plant FSAR, consists of Construction and Installation Tests, Preoperational Tests and Startup Tests (which includes power ascension tests). Preoperational testing activities verify operational performance of systems, structures, and components (SSCs) prior to fuel load, and should address tests required by Regulatory Guide 1.68, (RG 1.68), "Initial Test Programs for Water-Cooled Nuclear Power Plants," and the related RGs referenced in RG 1.68, First of a Kind (FOAK) tests, and testing required by license conditions.

In accordance with 10 CFR 52.47(b)(1), Inspections, Tests, Analyses and Acceptance Criteria (ITAAC), are those tests the licensee shall perform, and the acceptance criteria that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the provisions of the Atomic Energy Act, and the Commission's rules and regulations. ITAAC should be included in section 14.3 of the FSAR and may be accomplished by preoperational testing.

FOAK tests are in-plant functional tests to verify that new, unique, or special design features will perform as required. FOAK tests can also be designated as First-Plant-Only-Test (FPOT) or some variation (such as F3POT, for first 3 plants only). FOAK tests should be described in section 14.2 of the FSAR and may be license conditions. FOAK tests may be accomplished by preoperational testing.

During the licensing process, the NRC sometimes requires special conditions or requirements, referred to as license conditions, to be included the license. The licenses for Vogtle Units 3 and 4 and Summer Units 2 and 3, include the AP1000 FOAK tests as license conditions. If a license condition requires testing, it may be accomplished by the preoperational tests.

02.01 Inspection Sample Selection

- a. Selection criteria for inspection of preoperational testing includes as a minimum 1) targeted ITAAC which are part of the preoperational test program, 2) preoperational FOAK tests, 3) preoperational license condition tests, and 4) other preoperational tests based on risk significance, uniqueness, or complexity, that are selected during the NRC inspection planning process:
 1. Targeted ITAAC are required to be inspected as resources allow, and may be part of a larger test. Inspection of non-targeted ITAAC is addressed under 02.01.a.4. ITAAC which are performed during preoperational testing are inspected under IMC 2503, Construction Inspection Program: Inspections of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Related Work, and the associated inspection procedures (IPs). This procedure may be used for additional guidance. The resource hours for targeted ITAAC inspection are included in the resource hours specified for IMC 2503.
 2. FOAK (or FPOT) tests are required to be inspected. This procedure is used to inspect those FOAK preoperational test inspections. If a FOAK test is also an ITAAC test, ensure both the ITAAC IPs and this procedure are used. For FOAK tests, a more detailed level of test procedure review and test results review is expected to be performed. The resources required for FOAK test inspection are included in the resource hours specified for IMC 2504 or IMC 2503 (for any ITAAC FOAK tests).
 3. If there are any preoperational license condition tests, they are required to be inspected. For license condition tests, a more detailed level of test procedure review and test results review is expected to be performed. The resources required for license condition tests, are included in the resource hours specified for IMC 2504 or IMC 2503 (for any ITAAC license condition tests).
 4. Additional preoperational tests (outside the targeted ITAAC, FOAK, or license condition tests) may be selected by the NRC for inspection when resources allow, based on risk significance, uniqueness, or complexity, and selected during the NRC inspection planning process.
 - i. Since the targeted ITAAC are normally part of a larger test, additional parts of the test may be inspected as allowed by the normal resources assigned to a targeted ITAAC.

- ii. Additional tests can be inspected when resources allow, based on risk significance, uniqueness, or complexity, and selected during the NRC inspection planning process.
 - iii. Additional ITAAC tests would be inspected under IMC 2503 and the associated IP's. Additional non-ITAAC tests would be inspected under IMC 2504 and this procedure.
 - iv. If, during the NRC inspection planning process the construction site residents propose to increase inspection scope requiring additional resources, NRC Region 2 management must authorize the additional resources.
- b. The preoperational test inspection scope may be increased based on poor licensee or test organization performance. Criteria to select additional tests for inspection include: 1) similarity to identified problem areas, 2) risk significance of the SSC, 3) lack of previous inspections in that SSC, 4) availability of the testing to inspect, 5) availability of resources to perform the inspection, and 6) selected during the inspection planning process.

02.02 Inspection Preparation

Inspection preparation includes: verifying licensee scheduling of the test, reviewing the applicable licensee commitments and regulatory requirements related to the test, reviewing the applicable design documents and test procedures, and ensuring NRC resources are available to perform the inspection.

02.03 Procedure Review

Review the selected test procedure to verify that the testing is performed in accordance with the FSAR, license, and NRC requirements; that the test adequately verifies important SSC performance attributes; and that the test contains clearly identified acceptance criteria.

02.04 Test Witnessing

Witness the test to verify that the pretest requirements are performed; the test is conducted in accordance with the approved procedure; test changes, anomalies, problems, interruptions, and/or deficiencies are identified and controlled; and observed data is properly recorded.

02.05 Test Results Review

Review the test results to ensure that the SSC was tested, and will operate, in accordance with the FSAR, license, and NRC requirements. Verify that the test acceptance criteria were met and that test changes, anomalies, problems, interruptions, and/or deficiencies, were appropriately dispositioned.

02.06 Quality Assurance Program (Problem Identification and Resolution)

Evaluate the implementation of the quality assurance program requirements related to preoperational testing. Confirm that problems identified during preoperational testing are entered into the corrective action program in accordance with program requirements.

70702-03 INSPECTION GUIDANCE

03.01 Inspection Sample Selection

No additional guidance

03.02 Inspection Preparation

- a. The preoperational test phase may be very fluid with emergent schedule changes. The NRC inspection planning process and the NRC inspectors need to maintain current information on the testing schedule.
- b. Comprehensive inspection planning guidance should include the following:
 1. For ITAAC tests review the ITAAC and the IP (65001 series) associated with the ITAAC.
 2. Review the final safety analysis report (FSAR) associated with the test and SSC being tested.
 3. Review any associated RGs for the test (such as RG 1.68).
 4. Review the applicable site data in the Construction Inspection Program Information Management System (CIPIMS) to determine if any previously identified open issues, findings, or observations are relevant to the inspection being planned.
 5. Review the applicable licensee specifications, procedures, and work control documents to understand the scope and content of the licensee's programmatic controls and how the test or activity to be inspected may be affected.
 6. FOAK and license condition preoperational tests require more detailed level procedure review and review of results discussed in sections 03.03 and 03.05.
 7. FOAK and license condition preoperational tests require notification to the NRO/DCIP Director, or designee, during the inspection planning phase. Certain FOAK and license condition tests will require HQ staff participation in the inspection preparation and/or performance.

8. Develop an inspection plan that identifies the specific aspects that need to be inspected.

03.03 Procedure Review

The inspector should evaluate the following attributes for each test selected for procedure review. Two alternate levels of inspection are provided in this IP for procedure review:

The first level involves preparation for test witnessing. The inspector should review the test procedure and what requirements are being verified. For test witnessing, complete steps a - c below in their entirety.

The second level involves a more detailed verification of the adequacy of the test procedure. The inspector should verify that the test procedure adequately meets all the regulatory and license requirements. This level of review should normally be performed for FOAK and license condition tests, and for tests that are not going to be witnessed. For test procedure adequacy review, complete steps a - d below in their entirety.

- a. Obtain a current revision of the selected test procedure(s) and associated documentation (e.g., electrical diagrams, piping and instrumentation drawings, calibration records, etc.) in sufficient time to allow a procedure review to be completed prior to the date scheduled for the test. Review the procedure(s) for technical adequacy and completeness. If deficiencies are noted during this review, identify these conditions to the responsible organization for disposition in their corrective action program.
- b. Review the DCD, FSAR, SER, Technical Specifications, and facility license. Verify that the test procedure adequately address FOAK test requirements, license condition requirements, license commitments, and NRC requirements relating to preoperational tests (including RG 1.68 and the RGs referenced in RG 1.68) and any associated ITAAC.
- c. Ensure that important equipment performance attributes are adequately confirmed by the pre-operational test and any associated ITAAC. The focus of this review should be on the technical adequacy of the test procedure to accomplish the pre-operational test and the ITAAC rather than the format of the document.
- d. Review the test procedure(s) to ensure they include the following attributes:
 1. Appropriate staff and management approval is indicated on the document.
 2. Test objectives are clearly stated. Verify that any related FSAR commitments are included.

3. Any required testing prerequisites are identified, e.g.:
 - i. Required plant systems availability is specified.
 - ii. Any associated facility procedures are specified.
 - iii. Prior completion of calibration checks, limit switch setting, protective device settings, etc. are included where applicable.
 - iv. Any special supplies and test equipment needs are specified.
 - v. Special environmental conditions and hold times, if any, are identified.
 - vi. Test precautions and limitations are specified.
4. Test acceptance criteria are clearly identified and the procedure requires comparison of results with acceptance criteria. The source of the acceptance criteria is also identified (e.g., preoperational test descriptions, ITAAC, FSAR, technical specifications, facility license, etc.).
5. Initial test conditions are specified.
 - i. Valve lineups
 - ii. Electrical power and control requirements
 - iii. Any temporary installations or equipment modifications (instrumentation, electrical, and piping)
 - iv. Any necessary special conditions e.g. temperatures, pressures, flows, water chemistry, etc.
6. The procedure includes a listing of references to appropriate preoperational test descriptions, ITAAC, FSAR sections, technical specifications, drawings, design specifications, industry codes, and other requirements.
7. Step-by-step instructions for the performance of the procedure, including hold points, if needed, are included to the extent necessary to ensure that the test is performed correctly and the test objectives are met.
8. Blank spaces are provided for initialing all items, including prerequisites, to document performance.
9. Provisions are made for recording details of the conduct of the test, including any test anomalies or observed deficiencies, their resolution, and any necessary retesting.

10. Procedure requires that any temporary connections, blind flanges, disconnections or jumpers be restored to normal at the end of the test, or references their control by another procedure.
11. Procedure provides for the identification of both personnel conducting the testing and those evaluating the test data. Provision is made for the evaluator to document acceptability of the data.
12. Procedure provides for quality control, quality assurance, engineering, or other specified individual verification of critical steps or test parameters.
13. Any special precautions for personnel and equipment safety are specified.
14. Expected performance of any automatic functions or controls, e.g. response to step and ramp control changes, is specified.
15. Procedure provides for verification of calibration of measuring and test equipment (M&TE) and recording of any temporarily installed or used M&TE equipment identification and calibration date.

03.04 Test Witnessing

The inspector shall review the following attributes for each of the tests selected for witnessing.

- a. Confirm that a current revision of the test procedure is available at the test location and is being used by test personnel. Before witnessing a test, the inspector should have completed a procedure review of the test procedure in accordance with 03.03. The inspector should be familiar with the test procedure in order to adequately witness the testing described in the procedure. Communication must be maintained between the inspector and the licensee so that the licensee's test dates are known far enough in advance for the inspector to be ready to witness the selected tests. The inspector should determine the current procedure revision by examining the licensee's document control system. Ensure by observation and discussions that test personnel are using the current procedure revision and are familiar with the procedural requirements, especially the limitations and precautions.
- b. Confirm that test personnel minimum staffing requirements are met. The procedure and/or preoperational test program should also specify the responsibilities and qualifications of test personnel. The inspector should, on a sampling basis, ensure that both requirements are met.
- c. Confirm that pretest briefings are conducted and appropriate shift turnover is performed to ensure continuity in ongoing test activities. Pretest briefings should include discussion of the risk to personnel and equipment, possible failure modes and effects, and Operating Experience applicable to the testing performed. Test personnel coordination and communication must be addressed. Clear identification of personnel assignments

and who is the test director must be addressed. Criteria for test termination should be discussed.

- d. Confirm that all test prerequisites and initial conditions are met and/or those which are waived are reviewed and approved in accordance with current approved administrative procedures and preoperational test program. Verification should be performed by the inspector's review of the required records (valve lineup list, instrumentation calibration procedure, system checklist, or signoff item in the test procedure) or by direct observation (monitoring instrumentation indications, valve positions, equipment status, etc. or observation of personnel actions).
- e. On a sampling basis, confirm that any M&TE required by the procedure is calibrated and in service at the time of the test. Test data recording equipment required by procedure is calibrated to a common time base. Test equipment with possibly greater accuracy than installed control instrumentation is normally required for measuring important parameters to demonstrate equipment performance in accordance with design criteria. This M&TE must be properly calibrated within the prescribed time period. If the M&TE was calibrated in the appropriate time period, it does not normally need to be recalibrated each time that piece of equipment is used, unless specified by the procedure or preoperational test program.
- f. Confirm that test personnel actions and coordination activities are adequately performed. Specifically, coordination can be an important aspect of a test if several personnel are involved in performing procedural steps. Many of these steps may involve coordinated activities between two or more personnel. The inspector should confirm through observation that the assigned individual directing the test activities is knowledgeable and that time sequencing, when required, is performed appropriately. On a sampling basis, the inspector should verify adherence to the procedural limitations and precautions, and the individual test steps.
- g. Review the Startup Test Engineers Log (or equivalent), the Control Room Log, and the Shift Supervisor's Log, as applicable. Test anomalies, problems, interruptions, and/or deficiencies should be recorded in the logs and reviewed for inclusion in the appropriate corrective action program.
- h. Confirm that test personnel or test director performs a preliminary review of test results to determine that the observed test results meet the established acceptance criteria. The acceptance criteria shall be clearly stated in the test procedure. If practicable, verify by direct observation that overall test acceptance criteria have been satisfied. Review the preliminary test results to ensure that the initial test evaluation is consistent with inspector observations. The inspector should also, independent from the licensee or test organization evaluation, observe and evaluate certain critical events or data gathering during and following testing activities. These events or data gathering (e.g. pump starts, valve opens, recording of flow rates, etc.) activities should be selected during the inspector's preparatory review of the procedure.

03.05 Test Results Review

The inspector should evaluate the following attributes for each test selected for results review. Two alternate levels of inspection are provided in this procedure for test results review.

The first level (more detailed review) involves independent inspection of test results. For the tests that are FOAK or license conditions, for tests that are not witnessed, and for other tests which the inspection plan requires independent inspector evaluation of test results, complete steps a – e below in their entirety.

The second level involves verification of licensee or test organization evaluation of tests results. For the remainder of the tests the inspection plan only requires verification that the test results have been adequately evaluated, and only steps d and e below need to be completed.

- a. Following test completion, the test data packages should be assembled by the licensees or the test organization. Review the "as-run" copy of the test procedure. Verify that individual test steps and data sheets have been properly initialed and dated. Verify that data sheets have been completed. Verify that all data is recorded where required and is within acceptance tolerances. Verify that test deficiencies and test procedure changes are properly identified in accordance with established administrative procedures.
- b. Review all test changes made during the performance of the test, including any testing deletions. Verify that each test was approved in accordance with the pertinent administrative procedures. Verify that the procedure is annotated to identify test changes. Verify that none of the changes have altered the basic objectives of the test.
- c. Review all test anomalies and deficiencies. Verify that these conditions have been documented, resolved, that the resolution has been accepted by appropriate management, and that retest requirements, if any, have been completed. Verify that any system performance problems identified by a test deficiency have been properly documented and reviewed. Verify that nonconformances, and conditions adverse to quality are documented in the appropriate nonconformance or corrective action system. Verify that any deficiencies which constitute a reportable occurrence as defined in 10 CFR Part 21, 10 CFR Part 50.55e, 10 CFR Part 50, and/or 10 CFR Part 52 have been properly reported.
- d. Review the test summary and results evaluation. The inspector should apply independent technical analysis and judgment to ensure that the evaluation of test results has been performed correctly. Verify that those personnel, responsible for review and acceptance of test results, have documented their review and acceptance of the data package and the results evaluation. Verify that the licensees or test organization engineering staff has evaluated the test results and concluded that the testing demonstrated that the equipment met design requirements. Verify that the evaluation compared test results with established acceptance criteria. For tests with complex analysis or where acceptance is established by engineering in lieu of specific acceptance criteria, consult with the appropriate NRC staff to verify acceptability of results.

- e. Verify that the Test Review Committee or equivalent group has examined the results in accordance with established administrative requirements. Verify that the Quality Assurance group or other independent review of test results has been accomplished as prescribed in the FSAR or other licensee commitments.

03.06 Quality Assurance Program (Problem Identification and Resolution)

This inspection is to ensure that problems are entered into the applicable process to ensure corrective actions appropriate to the circumstances, are developed and prioritized. The inspector may review actions to address similar or related problems that were previously identified, in order to check the extent of condition and confirm the effectiveness of the licensee's corrective measures. Inspections of Quality Assurance Program implementation, effectiveness of Problem Identification and Resolution, and Self-Assessment will be performed under the IMC 2504 process.

70702-04 RESOURCE ESTIMATE

Resources to implement this procedure are as specified for ITAAC inspection under IMC 2503, and preoperational test program inspection under IMC 2504. Therefore, no separate resource estimate is made for this procedure.

70702-05 REFERENCES

Facility Final Safety Analysis Report (FSAR) and Design Control Document (DCD)

Inspection Manual Chapter (IMC) 2503, Construction Inspection Program: Inspections of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Related Work, Appendix B, Site Specific ITAAC Matrix

IMC 2503, Appendix C, Site Specific ITAAC Sample Selection Process

Inspection Procedure (IP) 65001, Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work

IP 35007, Quality Assurance Program Implementation during Construction and Pre-Construction Activities

IP 70367, Inspection of the Preoperational Test Program

Regulatory Guide 1.68, Initial Test Programs for Water-Cooled Nuclear Power Plants, Revision 4, June 2013

END

Attachment 1:
Revision History

Attachment 1 - Revision History for IP 70702

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML13294A482 01/15/14 CN 14-001	Initial issue to support inspection of construction programs described in IMC 2504. Completed 4 year search of Historical Change Notices, and no commitments were found.	N/A	ML13294A486