

The Need for Timely Re-Inspection of Vendor Facilities

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1/23/2014



Agenda

- Brief Background and Potential Options
- Discussion of Issue and Challenges
- Proposed path forward

Background

- NEI 08-01, Section 3.1.4:

“The NRC plans to perform closure verification of the licensee’s ITAAC Closure Notifications and review NRC inspection records to confirm that all planned inspections for the given ITAAC were completed and that any associated ITAAC Findings are satisfactorily resolved.”

Background (From 11/7/13 Meeting)

- If an ITAAC Finding is identified at a Vendor facility, there will be re-inspection of the Vendor by NRC staff to close the NON prior to making the determination that the ITAAC acceptance criteria has been met, and subsequently verifying the ITAAC Closure Notification (ICN)

Potential Options for “Satisfactorily Resolved”

1. Accelerated re-inspection of ITAAC-related vendor findings once corrective actions are complete to close NON
2. Alternate Closure path for NON that doesn't involve vendor re-inspection
3. Discussion of Corrective Actions in ICN prior to re-inspection and NON closure

Discussion

- NEI 08-01, Section 3.1.4:

“The licensee is responsible for notifying the NRC under Section 52.99(c)(1) when a completed ITAAC is ready for verification by the NRC. Before the licensee submits an ITAAC Closure Notification to the NRC, it will have resolved any identified ITAAC Findings that would otherwise preclude NRC Staff from determining that the ITAAC are met.”

Discussion

- NEI 08-01, D-1 ICN Template:

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, the licensee will perform a review of all ITAAC Findings pertaining to the subject ITAAC to determine that associated corrective actions were completed. The ITAAC Closure Notification will list all ITAAC Findings relevant to the successful completion of the ITAAC and state that they have been closed and necessary corrective actions have been completed. Alternatively, the letter will provide a justification for why the NRC may issue its Section 52.99 determination of successful ITAAC completion despite the existence of uncompleted corrective actions. ITAAC completion reviews will be documented in ITAAC Completion packages and available for NRC inspection.

- ICN Verification Checklist (Item “d”)

All ITAAC findings relevant to the ITAAC are listed in the ICN or IPCN as closed, and any required Region II inspections have been completed for the ITAAC. (Enter “N/A” if Construction Inspection Program Management System (CIPIMS) has no inspection findings and/or no required inspections for the ITAAC.)

Discussion (From 11/7/13 Meeting)

- The staff stated that while re-inspection of the Vendors will be performed to confirm that ITAAC Findings have been satisfactorily resolved, the Licensees will have the ability to submit ICNs with an associated Vendor ITAAC Finding provided the Licensees are satisfied that the corrective actions taken by the Vendor properly address the associated ITAAC Finding

Challenges

- Unknown timetable for re-inspection creates schedule uncertainty for ITAAC closure
- The delay of ITAAC closure due to the need for re-inspection could add to the “surge” period, putting added pressure on resources during all phases of ITAAC closure and verification
- Potential increased regulatory uncertainty to the Licensees (Submittal of an ICN prior to re-inspection of the Vendor facility could cause the potential for differing interpretation on the adequacy of the corrective actions taken)

Proposed Path Forward

1. Accelerated re-inspection of ITAAC-related vendor findings once corrective actions are complete to close NON (Provides highest level of certainty)
2. Alternate Closure path for NON that doesn't involve vendor re-inspection (e.g., routine Licensee inspection report)
3. Discussion of Corrective Actions in ICN prior to re-inspection and NON closure (NEI 08-01 Option of justification in lieu of NON closure. Needs alignment on what constitutes adequate justification.)

Questions or Discussion?