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October 28, 2015

Mr. Michael C. Cheok
Director, Division of Construction Inspection and Operational Programs
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 08-02, *Corrective Action Processes for New Nuclear Power Plants During Construction*, Draft Revision 4

Project Number: 689

Dear Mr. Cheok:

Attached for NRC review is draft Revision 4 of NEI 08-02, *Corrective Action Processes for New Nuclear Power Plants During Construction*. NEI 08-02 provides generic guidance for holders of a 10 CFR Part 52 combined license or limited work authorization on roles, responsibilities and implementation of construction corrective action processes (CCAP) that will be used during the on-site construction of new nuclear power plants.

In a letter dated April 21, 2010, the NRC staff stated that the guidance provided for implementing a corrective action process per NEI 08-02, Revision 3, met the requirements of 10 CFR Part 50, Appendix B, Criterion XVI. However, the letter went on to say that in the absence of actual experience with projects employing multiple interfacing CAPs, the NRC would not pursue endorsement of NEI 08-02, Revision 3, at that time.

Draft Revision 4 updates the guidance to reflect experience gained during the construction of the first new nuclear plants licensed under 10 CFR Part 52. Specifically, the draft revision reflects experience gained in:

- implementing multiple corrective action processes on-site
- establishing and implementing consistent thresholds for problem identification
- screening and evaluation to identify significant conditions, and
- analyzing for adverse trends.

Mr. Michael C. Cheok

October 28, 2015

Page 2

While draft Revision 4 maintains the option to implement a single corrective action program on-site, additional guidance is provided for implementing multiple corrective action processes on-site based on experience from the construction corrective action processes at Vogtle 3/4 and Summer 2/3. In early 2013, the NRC found these processes to be adequate for use during the performance of construction activities authorized by the combined license.

In addition, the guidance has been modified to reflect the NRC endorsement of ASME/ANSI Consensus Standard NQA-1-2008 with 2009 addenda. References to NQA-1-1994 have been retained for the benefit of existing licensees and applicants.

Upon resolution of any staff comments on the draft guidance, we plan to submit final guidance for NRC endorsement in a regulatory guide. The NRC-endorsed guidance will assist future licensees in assuring a common understanding of CCAP roles and responsibilities among project participants, including the licensee, reactor designer and constructor. We look forward to the staff's feedback and are prepared to discuss the draft CCAP guidance in a public meeting to facilitate the staff's review.

If there are any questions on this matter, please contact me or Kati Austgen (202.739.8068; kra@nei.org).

Sincerely,



Russell J. Bell

Attachment

c: Ms. Kerri A. Kavanagh, NRO/DCIP/QVIB, NRC
Mr. Michael E. Mayfield, NRO/DARR, NRC
Ms. Kimyata Morgan-Butler, NRO/DARR/NRGB, NRC
NRC Document Control Desk