

December 14, 2015

MEMORANDUM TO: Robert Lukes, Acting Branch Chief
Construction Inspection Program Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

FROM: Michael Webb, Senior Reactor Operations Engineer **/RA/**
Construction Inspection Program Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

SUBJECT: SUMMARY OF NOVEMBER 18, 2015, PUBLIC MEETING TO
DISCUSS THE CONSTRUCTION INSPECTION PROGRAM

On November 18, 2015, the U.S. Nuclear Regulatory Commission (NRC) held a public meeting with industry and members of the public to discuss the Construction Inspection Program. The following summarizes each of the presentation topics from the meeting agenda:

- a. The meeting began with presentations by the NRC staff and industry on the Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Notification (UIN) pilot project.

The purpose of the pilot project is to evaluate the potential benefits of reviewing early UIN submittals (i.e., those that are submitted months ahead of the 225-day regulatory requirement). The early UINs would provide earlier communication to public stakeholders of the UIN information and may reduce staff review time during the expected surge of ITAAC Closure Notices (ICNs) expected late in construction. The pilot project is intended to exercise the licensee's procedures and programs for developing the UIN and to determine how changes will be tracked between submittal of the UIN and subsequent submittal of the ICN. The NRC staff conducted a public meeting in September 2015 announcing the project; Southern Nuclear Corporation (SNC) and South Carolina Electric & Gas (SCE&G) submitted UIN pilot material in November 2015; SNC and SCE&G will submit ICNs related to the UIN pilot project between February and June 2016; and the staff will conduct a public meeting in July 2016 to discuss the results and recommendations of the pilot project. The NRC slide package is available at ADAMS Accession No. [ML15321A137](#). The industry slide presentation is available at ADAMS Accession No. [ML15321A136](#).

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- b. The NRO staff gave an overview of NRC's recognition of the International Laboratory Accreditation Cooperation (ILAC) accreditation process. By letter dated April 29, 2014, the Nuclear Energy Institute (NEI) submitted for NRC's review and endorsement NEI 14-05, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services." By letter dated February 9, 2015, NRC issued its safety evaluation report (SER) on NEI 14-05. The NRC applied conditions in order to use the accreditation, including that it be documented in the Quality Assurance (QA) program. The NRC staff is developing a Regulatory Information Summary (RIS) that will announce and clarify NRC's technical position on the use of the ILAC accreditation process in lieu of performing a commercial-grade survey as part of the commercial-grade dedication process. The staff is currently addressing public comments it received. Suppliers of basic components may begin to use the ILAC accreditation process and do not have to wait for NRC's approval of a QA program change for a licensee. In addition, the staff discussed the use of National Metrology Institutes (NMIs), such as the National Institute of Standards and Technology, as suppliers of primary reference standards and calibration services. Further details regarding the SER, the RIS, and the use of NMIs are included in the NRC staff presentation (ADAMS Accession No. [ML15320A202](#)).
- c. NRC staff provided a summary of NRC vendor inspections affecting ITAAC. Stakeholders had requested to be informed of issues identified through vendor inspections that could potentially impact an ITAAC. Consequently, the NRC staff began issuing periodic letters that summarize the most recent findings, their potential impact on an ITAAC, and corrective actions by the vendors. The most recent (third) letter was issued October 8, 2015 (ADAMS Accession No. ML15219A276). Since the first letter, 17 ITAAC-related findings have been identified, four of which were identified in the most recent letter. The four issues included failure to document and evaluate test parameter departures, inadequate scope of qualification test – most adverse current transients not applied, inadequate configuration of Protection and Safety Monitoring System cabinets without proper justification, and inadequate commercial grade dedication of Electromagnetic Compatibility testing. Further details are available in the NRC staff presentation (ADAMS Accession No. [ML15317A502](#)).
- d. A representative from NEI provided an overview NEI 08-02, Corrective Action Processes for New Nuclear Power Plants During Construction, Draft Revision 4, which NEI submitted to the NRC staff by letter dated October 28, 2015 (ADAMS Accession No. ML15306A510). The presentation briefly discussed an outline of the content of the document (6 sections and 2 attachments) and that it reflected experience gained at construction sites, including 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 (ADAMS Accession No. [ML15317A285](#)).

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- e. A representative from SNC provided construction updates for Vogtle Units 3 and 4 (ADAMS Accession No. [ML15322A223](#)).
- f. A representative from South Carolina Electric & Gas provided construction updates for V.C. Summer Units 2 & 3 (ADAMS Accession No. [ML15320A387](#)).

Enclosure:
List of Attendees

R. Lukes

- e. A representative from SNC provided construction updates for Vogtle Units 3 and 4 (ADAMS Accession No. [ML15322A223](#)).
- f. A representative from South Carolina Electric & Gas provided construction updates for V.C. Summer Units 2 & 3 (ADAMS Accession No. [ML15320A387](#)).

Enclosure:
List of Attendess

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NAME	M. Webb	R. Lukes
DATE	12/03/15	12/04/15

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NRC Public Meeting to Discuss the Activities Related to the Construction Inspection Program

Wednesday, November 18, 2015

1:00 p.m. – 3:15 p.m.

TWFN Auditorium

Name	Organization
Anderson, Brian	NRC
Austgen, Kati	NEI
Bell, Russ	NEI
Bickley, Brandon	SCANA
Bryant, Barry	Dominion
Cheok, Mike	NRC
Cozens, Ian	NRC
Diaz-Castillo	NRC
Fay, Tom	Fluor
Fredette, Thomas	NRC
Gaslevic, Jim	NRC
Gwyn, Dealis	MOX Services
Jimenez, Jose	NRC
Kellenberger, Nick	SCE&G
Klinvex, Michael	Westinghouse
Kozak, Tom	NRC
Law, Yiu	NRC
LeRoy, Peter	CB&I
Miller, Keith	Dominion
Morrow, Calvin	SNC
Patel, Raju	NRC
Pugh, Amanda	SNC
Roach, Ed	NRC

Robillard, Dave	PSEG
Salter, Findlay	SCE&G
Stacy, Kara	SNC
Webb, Michael	NRC
Weber, Carl	NRC
Wilson, Josh	NRC
Yox, Michael	SNC
* Bergman, Jana	Curtiss-Wright
* McIntyre, Brian	Westinghouse

*Indicates remote participation via telephone bridgeline or webinar

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