

Results of the Nuclear Regulatory Commission Staff's Review of NEI 08-02, "Corrective Action Process for New Nuclear Power Plants During Construction"

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Current Revision

- In October 2015, the Nuclear Energy Institute (NEI) submitted NEI 08-02 , Draft Revision 4. The revision's stated purpose:
 - Reflect experience gained from construction of new nuclear plants in the following areas:
 - Implementing multiple corrective action process on-site
 - Establishing and implementing consistent thresholds for problem identification
 - Screening and evaluation to identify significant conditions
 - Analyzing for adverse trends

Staff Review

- The recent review of NEI 08-02, Draft Revision 4 resulted in the staff's continued reservations to use additional resources to pursue potential endorsement
- Main reasons for this conclusion:
 - Adequate stakeholder guidance exists in the endorsed NQA-1 standard, "Quality Assurance Requirements for Nuclear Facility Applications"
 - Experience with the current new nuclear plant construction corrective action program (CAP) implementation through the Construction Reactor Oversight Process
 - Lack of evident stakeholder interest in additional CAP guidance.

Staff Review

- Supplemental reasons not to pursue potential endorsement:
 - Lack of inclusion of previous operating experience from operating plants and prior new construction
 - Challenges to implementing multiple and diverse CAPs
 - Consistent thresholds for problem identification
 - Initial screening for safety significance
 - Adequate trending of issues with potential generic implications

Staff Review

- Supplemental reasons not to pursue potential endorsement (cont'd):
 - The guidance could potentially limit what issues are entered into the CAP
 - The guidance is not inclusive of all programmatic areas. There is no guidance for applicability of the CAP to:
 - Industrial safety
 - Security
 - Environmental



Staff Review

- Supplemental reasons not to pursue potential endorsement (cont'd):
 - Guidance not to enter conditions that are still within control of the work process into the CAP
 - Examples include:
 - Design errors before all approvals are complete
 - Installation errors before Quality Assurance (QA) or Quality Control (QC) verification
 - Nonconforming material where work process contains guidance for repairing

Recommended Path Forward

- The staff recommends the continued support of the ASME NQA-1 Standards process to ensure the standard remains relevant and consistent with regulatory requirements for a robust CAP.



Summary

- It is the staff recommendation to discontinue the expenditure of resources to conduct the review and potential endorsement of NEI 08-02.
- The staff's basis for their conclusion is that the guidance document fails to provide sufficient additional clarity to ensure a robust CAP for the construction phase of a nuclear power plant.

Questions?

