

February 8, 2017

MEMORANDUM TO: Victor Hall, 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 JANUARY 19, 2017, PUBLIC MEETING TO DISCUSS
THE CONSTRUCTION INSPECTION PROGRAM

On January 19, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting at the Vogtle Electric Generating Plant (Vogtle) site near Waynesboro, Georgia, with industry and members of the public to discuss the NRC Construction Inspection Program (CIP). In addition to the status of construction and related inspection, the meeting focused on issues related to Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and the transition of regulatory oversight and licensing for the Westinghouse AP1000 plants from construction to operations. The following summarizes each of the presentation topics:

- a. The meeting began with a presentation by the NRC Region II Senior Resident Inspectors for the Vogtle Units 3 and 4 and V.C. Summer (Summer) Units 2 and 3 plants currently under construction. After providing an overview of the Region II, Division of Construction Oversight, the speakers discussed lessons learned from multiple years of construction oversight, including inspecting early, inspection timing, focusing on field work, and records related to ITAAC. They then discussed upcoming challenges, including the transition to turnover from construction to operations and ITAAC-related documentation closure. Following the presentation, based on a question regarding a recent 10 CFR Part 21, "Reporting of Defects and Noncompliance" report submitted to the NRC, the staff discussed how it addresses such reports, noting that the staff had not completed its assessment of the recent Part 21 submittal. Further details are available in the NRC staff presentation (ADAMS Accession No. [ML17012A294](#)).
- b. In the second presentation, NRC Office of New Reactors (NRO) staff discussed Region II and NRO vendor inspection coordination of ITAAC inspections. The presentation provided a broad overview of the CIP and the different roles of Region II and headquarters (i.e., NRO) staff. The presentation noted that a large portion of the CIP is devoted toward ITAAC-

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related inspection (approximately 15,000 of the 35,000 hours of inspection estimated per unit). Onsite inspections are planned, performed, and documented by Region II staff and vendor inspections are planned, performed, and documented by NRO staff. Furthermore, these two inspection programs are administered by different sections of the NRC Inspection Manual Chapter (IMC), inspection results are reported in different formats, and the results are tracked in different internal databases. While most ITAAC-related inspections occur on site, there are times when it makes sense to inspect an ITAAC while a vendor is working on a component. Therefore, the NRO vendor inspection staff, with the assistance of Region II staff, has included ITAAC-related issues within the scope of some of its inspections. The NRC staff identified an opportunity to clarify its documentation of ITAAC-related inspections, which would make them more easily tracked by external stakeholders. As a result, NRC staff is coordinating more closely for ITAAC-related vendor inspections, fine tuning its inspection documents, and developing an improved public website for all ITAAC-related findings. Further details are available in the NRC staff presentation (ADAMS Accession No. [ML17011A053](#)).

- c. The NRO staff gave an overview of the staff's efforts to plan the transition of regulatory oversight and licensing for AP1000 plants from construction to operations. The presentation stated that in 2013, the NRC established a transition working group to identify and assess the regulatory functions necessary to support the transition of new reactors from construction to operation. The staff published a report that identifies 21 readiness issues and implementing recommendations. The NRC has developed implementation plans and milestones for each recommendation. The presentation noted that a publically available draft document, "Draft Implementation Plan to Ensure NRC Staff Readiness for AP1000 Operations, Revision 0," (Accession Number [ML15299A390](#)) provides further details on this issue. The NRC staff presentation is available at ADAMS Accession No. [ML17010A370](#).
- d. The next portion of the meeting was an NRO staff discussion related to ITAAC Closure Notifications (ICNs) and Uncompleted ITAAC Notifications (UINs). NRO staff gave an update on the status of the number of ICNs and UINs that is has received and processed. The staff then provided insights on how licensees could "tell the story" to enable the staff to verify closure of the ICN submittals; this included minimizing referencing non-publically available information, providing a summary description when referencing non-publically available information, and if applicable, providing numerical values in the results discussion. In addition, the staff noted that when an industry code or standard is cited in the submittal, it should be referenced with as much specificity as practical. The presentation then discussed definitions and general provisions, including "as-built." The NRC staff presentation is available at ADAMS Accession No. [ML17012A120](#). After this presentation, the staff answered questions on interpreting the ITAAC closure process described in Nuclear Energy Institute (NEI) document NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," Revision 5 – Corrected," which the staff endorsed in Regulatory Guide 1.215, "Guidance for ITAAC Closure Under 10 CFR Part 52."
- e. A representative from SCE&G provided construction updates for Summer Units 2 & 3 (ADAMS Accession No. [ML17018A094](#)).

- f. A representative from SNC provided construction updates for Vogtle Units 3 and 4 (ADAMS Accession No. [ML17017A393](#)).

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Enclosure:
List of Attendees

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- CIPB R/F
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- ARivera-Varona, NRO
- JBurke, NRO
- TJackson, NRO
- JJimenez, NRO
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ADAMS Accession No: ML17032A415 NRC-001

OFFICE	NRO/DCIP/CIPB	NRO/DCIP/CIPB
NAME	Michael Webb	Victor Hall
DATE	02/02/2017	02/08/2017

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

**Thursday, January 19, 201 - 8:30 a.m. – 12:00 p.m.
Vogtle Electric Generating Plant**

Name	Organization
Austgen, Kati	NEI
Bell, Russ	NEI
Bickley, Brandon	SCE&G
Carroll, Glenn	Nuclear Watch South
Cesare, Greg	Westinghouse
DiTommaso, Sarah	Westinghouse
Durrwachter, Kevin J	SNC
Fay, Tom	Fluor
Forehand, Roger	SNC Construction Compliance
Fredette, Tom	NRC
Fuller, Justin	NRC
Gwyn, Dealis	MOX Services
Henshaw, Jason	SNC Construction Compliance
Heisserer, Jamie	NRC
Hughes, Jim	SNC ITAAC
Jimenez, Jose	NRC
Johnson, Andrea	NRC
Jones, William B	NRC
Kanitz, Daniel	SNC Construction Compliance
Krohn, Paul	NRC
Landon, Christopher	Westinghouse
Lynn, Wendell	SNC
Morrow, Calvin E	SNC ITAAC
Nazario, Tomy	NRC
Olson, Josh	SNC ITAAC
Pugh, Amanda	SNC
Rivera, Aida	NRC
Sanders, Garrett	SCANA
Stacy, Kara M	SNC
Steele, Joanne	Nuclear Watch South
Stroud, Russ	SNC Site Licensing
Thompson, Ryder	SCE&G
Weathersby, Jason	SCE&G
Webb, Michael	NRC
Welch, Chris	NRC
Williams, Jim	SNC Work Management
Willis, Frederick	SNC
Woods, David	SNC

Yates, Doug	MOX Services
Yox, Michael	SNC
* Barczak, Sara	Southern Alliance for Clean Energy
* Bergman, Jana	Scientech
* Weber, Carl	NRC

*Indicates remote participation via teleconference or webinar

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