

SEP 28 1982

MEMORANDUM FOR: J. M. Taylor, Director, Division of Reactor Programs, IE

FROM: J. L. Crews, Director, Division of Resident, Reactor
Projects and Engineering Programs, RV

SUBJECT: REVISIONS TO REACTOR CONSTRUCTION PROGRAM
(MC-2512) INSPECTION PROCEDURES

In accordance with your memorandum of August 23, 1982 on the same subject, we have reviewed the transmitted inspection procedures, and have provided comments on Enclosure (1).

Should you have any questions regarding our comments, please contact G. B. Zwetzig (FTS 463-3749).

(51)

J. L. Crews, Director
Division of Resident, Reactor
Projects & Engineering Programs

Enclosure:
As stated

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DATE	9/28/82	9/28/82	9/28/82				

Enclosure (1)

REGION V COMMENTS ON DRAFT IE INSPECTION PROCEDURES

(IP Nos. 46051, 46053, 46055, 47051, 47053, 47055, 48051, 48053, 48055, 63050, 50071, 50073, 50075, 50095).

General Comments

1. Based on Region V inspection experience it is estimated that these procedures will require as much as 100% more inspection time than the present procedures. Our estimates of direct inspection manhours required to conduct the routine portions of these revised procedures are as follows:

<u>Procedure Number</u>	<u>Estimated Hours</u>	
	<u>Present</u>	<u>Revised</u>
46051	16	32
46053	24	36
46055	16	24
47051	16	32
47053	24	36
47055	16	24
48051	16	32
48053	24	36
48055	16	24
63050	25	25
50071	16	24
50073	30	40
50075	16	24
50095	30	36

2. For modules requiring Quality Assurance Review there are specific requirements for a technical review of the construction specifications against the design criteria presented in the SAR. This will require regions having a "generalist philosophy" (such as Region V) to assign specific inspectors from each discipline and insure that in addition to knowledge of construction processes, the inspector also has the training necessary to perform technical review of the design specification versus the SAR.
3. Some of the revised modules appear to be low priority inspection procedures. It is recommended that module revision priorities be adjusted to correspond to inspection priorities.

Specific Comments

1. Specific comments for IP 50073:
 - a. Section 021(c) - Installation requirements addressing "proper location, placement/alignment, and mounting/supporting" are deleted in this IP. Unless they are picked up in another IP they should be added to this section.

- b. Section 02, paragraph 024 - Reference to item 1 and 3 in last sentence is not clear. Should read "complete selected portions of Section 021."
 - c. Section 03, third paragraph under subsection 031 General Guidance: This paragraph should either be deleted in its entirety or at least revise the first sentence to read "Findings from this inspection activity should address each element covered during the inspection."
2. Specific comments for IP 50075:
None
 3. Specific comments for IB 50095:
None
 4. Specific comments for IP 50071:
 - a. Section 02, paragraph 022: delete provision 022(a) and replace with "a. Procurement documents incorporate the technical and quality requirements specified in the material requisition. This includes identification of material specifications and, if required, performance test requirements."
 - b. Section 02, paragraph 022, provision (b): revise first sentence to read "Receipt inspections... including adequacy of field performance testing."
 - c. Section 03, third paragraph under subsection 031 General Guidance: This paragraph should either be deleted in its entirety or at least revise the first sentence to read "Findings from this inspection activity should address each element covered during the inspection."
 5. Specific comments for IP 46051:
Inspection requirements have been increased from 2 elements to 7 elements, but the additional module elements (such as audits and surveillances) have been effectively reviewed in previous inspections.
 6. Specific comments for IP 46053:
Paragraph 0236 should contain an expanded discussion on vibrators as discussed in the current module 47053.
 7. Specific comments for IP 46055:
Inspection requirements have been increased by including mandatory review of audits.

8. Specific comments for IP 47051:

None

9. Specific comments for IP 47053:

Inspection requirements have been increased from 6 elements to 9 elements.

10. Specific comments for IP 47055:

None

11. Specific comments for IP 48051:

Increased emphasis has been placed on technical review of the construction specification for conformance with the SAR.

12. Specific comments for IP 48053

Paragraph 023 is missing an IE module number.

13. Specific comments for IP 48055:

None

14. Specific comments for IP 63050:

None