



# 10 CFR Part 52 Construction Lessons Learned Report



# Introduction

- Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52 Lessons Learned Working Group Charter – ML21160A031
- 10 CFR Part 52 Construction Lessons Learned Report – ML23325A202

# Efforts and Achievements for Vogtle Units 3 and 4

- Total ITAAC notifications reviewed
  - 823 Uncompleted ITAAC Notifications
  - 824 ITAAC Closure Notifications
  - 9 ITAAC Post Closure Notifications
- Approximate direct inspection hours
  - 34,400 Vogtle Unit 3
  - 19,100 Vogtle Unit 4
- Licensing actions
  - 195 license amendment requests
  - 9 exemptions
  - 18 code alternatives





# Outreach and Public Involvement

- August 19, 2021 – announced the lessons learned project during a public meeting
- September 27, 2022 – public meeting with Southern Nuclear Company (SNC)
- November 15, 2022 – public meeting with Nuclear Energy Institute (NEI) and Kozak Innovative Safety Solutions
- February 14, 2024 - present report within 1 month of issuance



# Report Structure

- Executive Summary
- Background
- Scope and Methodology
- Lessons Learned, Recommendations, and Suggestions
  - Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)
  - Construction Inspection Program
  - Licensing
  - Overall Program
  - Considerations for Future Rulemaking
- Summary

## Recommendations - ITAAC

- (R.1) Ensure there is flexibility to select a representative sample of inspections throughout any construction area and not require preselected ITAAC to make up the baseline inspections.
- (R.2) Ensuring clarity of the scope of each ITAAC, providing clear acceptance criteria with appropriate flexibility, and defining terminology in the ITAAC will help to ensure that the licensee and the NRC have a common understanding of how the ITAAC will be met.

## Recommendations - Construction Inspection

- (R.3) The construction inspection program should shift to a plan that is more focused on inspecting the safety related activities during construction. This approach does not mandate specific ITAAC completion, but ITAAC could be selected as part of a risk-informed sampling method.
- (R.4) Consider a flexible staffing model that can more readily adapt to the dynamic nature of construction.
- (R.5) Evaluate whether changes to fee billing requirements would be feasible, appropriate, and improve efficiency while facilities are under construction.



## Recommendations - Licensing

- (R.6) Provide methods for ensuring effective and timely communication to resolve issues.
- (R.7) Continue to identify those activities that will benefit from dedicated resources and allow resources to be assigned as priorities are adjusted.



## Recommendations - Overall Program

- (R.8) Continuously estimate and monitor the total cost to the licensee and assess the efficient use of hours in a transparent manner.
- (R.9) Proactively identify and promptly resolve licensing, inspection, or regulatory challenges or gaps that could unnecessarily impact the schedule for completion of future nuclear facilities.

# NRC's Oversight Performance

- Did the staff achieve the NRC's mission of providing reasonable assurance of adequate protection of public health and safety?
  - Yes
- Did regulatory activities unnecessarily delay the construction schedule?
  - No
- Were NRC resources expended efficiently and within the established goals?
  - Yes, with some exceptions, and there are opportunities to gain efficiencies.



## Q&A

- Industry Perspectives
  - Public Comments
  - Staff Responses
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