May 4, 2004

TO: Douglas H. Coe, Section Chief
Construction Inspection Program
Inspection Program Branch
Division of Inspection Program Management, NRR

THROUGH: Mary Ann Ashley, Team Leader
Construction Inspection Program
Inspection Program Branch
Division of Inspection Program Management, NRR

FROM: Edmund Kleeh,
Reactor Operations Engineer ***/RA/***
Construction Inspection Program
Inspection Program Branch
Division of Inspection Program Management, NRR

SUBJECT: SUMMARY OF APRIL 26, 2004, MEETING WITH NUCLEAR ENERGY INSTITUTE TO DISCUSS SAMPLE SCHEDULES FOR THE CONSTRUCTION INSPECTION PROGRAM INFORMATION MANAGEMENT SYSTEM DEMONSTRATION PROJECT

On April 26, 2004, Nuclear Regulatory Commission (NRC) staff from the Inspection Program Branch, and the New Reactor Licensing Section met with representatives from the Nuclear Energy Institute (NEI) to provide eight additional, non-proprietary example schedules developed by Westinghouse for the Construction Inspection Program Information Management System (CIPIMS) demonstration project. The additional examples were for schedules of pertinent work activities to meet Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) for the Advanced Boiling Water Reactor (ABWR) and the AP1000 certified designs. Seven of the additional example schedules were for the AP1000 certified design.

This meeting was classified as a Category 2 meeting which provided an opportunity for members of the public to discuss regulatory issues with the NRC. Attachment 1 is a list of attendees and Attachment 2 contains the handout for the meeting. The handout contained portions of the ten example schedules currently complete (two of the example schedules were previously presented to the NRC). Westinghouse also gave to the NRC, a compact disc (CD) which contained the same information. The CD also contained a copy of the ITAAC tables for the AP1000 certified design for use in the CIPIMS project.

The meeting opened with a discussion of action items from the April 1, 2004 meeting between NEI and the NRC on the CIPIMS demonstration project.

Action Item 1. - A Westinghouse representative presented to the NRC a non-proprietary, sample schedule for a reactor vessel closure head. That schedule had been discussed at the meeting between the NRC and NEI on February 13, 2004. This action item was closed.

The NRC staff asked whether licensee, quality-assurance (QA) personnel, regardless of the work location, would keep a construction schedule current. The Westinghouse representative stated that a member of the licensee's staff, not necessarily QA personnel, would most likely be tasked with keeping the NRC informed of any schedule changes.

Action Item 3. - A Westinghouse representative stated that the licensee's QA program is separate from ITAAC and that QA records are transferred with a component as it moves from vendor facility to vendor facility or to the plant site. Deviation reports will reside at different locations dependent upon their type and nature. However, the licensee's QA program will impose stringent requirements as to where specific deviation reports should reside. The NRC had no additional questions and the action item was closed

Action Item 4. - This action item was assigned to the NRC however Westinghouse provided additional information on the topic.This meeting's handout contains a letter to Jim Winters of Westinghouse from a Westinghouse Information Technology representative which presents a preferred method for dissemination of proprietary information to the NRC from the nuclear industry, in general, and reflects only Westinghouse's preference at this time. This method would assign the NRC an ID and password to access a site with files either in PDF or some other means of encryption. This site would be outside of the firewall of the host preventing the NRC and the host from sharing the same site. The NRC still needs to discuss this matter with OGC so the action item is still open.

Action Item 5 - Westinghouse presented to the NRC Program Evaluation and Review Technique (PERT) charts for the two example schedules presented at the April 1, 2004 meeting between the NRC and NEI. This completed this action item and led to a discussion on PERT charts.

Actions Items 6. and 7. - The Westinghouse representative provided to the NRC examples of two-week rolling schedules and an example schedule that contains both electrical and instrumentation and control (I&C) components. These action items were closed.

The original schedules for these two work streams had only a first generation of predecessors to the two ITAAC and thus were rather simplified. The Westinghouse representative stated that if you go back additional generations of predecessors, that the number of predecessors expands geometrically. The Westinghouse representative stated that each additional preceding generation is less relevant than the generations following it, in regard, to the completion of a particular ITAAC. Only the immediate first generation of predecessors is really relevant to the completion of an ITAAC with the verification of the other preceding generations of predecessors being the responsibility of a good QA program.

The NRC staff stated that there was a two-fold purpose in reviewing the preceding generations. One was the relevance of a particular level in regard to completing a specific ITAAC. The second was to determine inspectable areas for scheduling inspectors. The NEI representative stated that the NRC was looking for inspectable QA related activities within those preceding generations to an ITAAC completion. The NRC staff further stated that regardless of the relevance of the preceding levels, the NRC was still interested in their connection to the completion of ITAAC.

A representative of Bechtel stated that the predecessors to the completion of ITAAC in those two predecessors seemed to be QA rollup items. Meaning that multiple QA items were represented by those predecessors and that during the construction of previous nuclear plants no such distinction was made between the various QA items required to complete a specific task. Bechtel's schedules do not contain those type of details. The Westinghouse representative then stated that the schedules for the previous two worksteams existed before their association with any ITAAC.

The Westinghouse representative then began to discuss the portions of the ten example schedules in the handout. He discussed the format of the schedules on the CD and stated that numerous sheets were needed for one schedule. For instance, the turbine gland seal system contained sixty, letter- type sheets. He then stated that some of the generations of predecessors may be relevant to the natural progression of construction activities but not necessarily to the completion of a specific ITAAC.

This lead to a discussion on the necessity of having steps in a construction schedule for the walkdowns of a particular system or components by the licensee prior to the acceptance of the ITAAC. The Westinghouse representative said that there will be no steps in the schedule for walkdowns but that there would be ones for the turnover of a system from the constructor to the operator. The licensee makes the required checks to ensure that the supporting basis for an ITAAC was adequate. Whether those checks will be in the construction schedule was not really decided at this meeting.

The NRC staff then asked how the NRC would know that construction discrepancies had been addressed. The representative of Westinghouse stated that would come from reliance on a good licensee correction action program (CAP). The NRC and NEI agreed that the basis for the correction of discrepancies would be compiled as construction progresses and that the basis would be used in determining whether an ITAAC was completed.

The Westinghouse representative then discussed the schedule for ITAAC 3.3.2.a. It was not evident what defined the reports required in that ITAAC's acceptance criteria.This was really a generic concern about all reports required by an ITAAC's acceptance criteria. The Westinghouse representative stated that the definitions for such reports are better defined for the AP1000 certified design then for the AP600 certified design. NEI agreed to take the lead defining the reports referred to in ITAAC and the standards with which they must comply.

The Westinghouse representative then discussed the four schedules for the CVCS system for ITAAC 2.3.2-2a, 2.3.2-3b, 2.3.2-4, and 2.3.2-11a; and the three schedules for the reactor vessel for ITAAC 2.1.3.2c, 2.1.3.3,and 2.1.1.7. The discussion focused on primarily two topics what happens when a component, on which an ITAAC completion is based, is partially damaged, and can acceptance criteria for ITAAC be confirmed at a vendor facility as well as at the nuclear plant site. The first item was really concerned about whether the licensee would disallow the ITAAC. NEI and Westinghouse agreed that the licensee would not take back the ITAAC but merely enter the matter into its corrective action program. The NRC decided to ask OGC about this matter and what should be the proper course of action for both the licensee and the NRC. The second issue was introduced by the discussion of the possibility of conducting a hydrostatic test on either the reactor vessel or a component of the CVCS system

at the factory instead of at the nuclear plant site. Both the NRC and NEI agreed that given the generic nature of most ITAAC that this would be permitted.

The Westinghouse representative raised the possibility of a licensee requesting the NRC to verify ITAAC prior to issuing a COL such that if a COL were issued it would reflect that the ITAAC was already completed. The NRC staff stated that it believed the 10 CFR Part 52 proposed rule addressed such a scenario because certain design-acceptance criteria (DAC) ITAAC could be done early in the process. Subsequent to the meeting, the NRC staff confirmed that the proposed rule language does allow for ITAAC to be recognized complete prior to issuing the COL. The proposed rule language is not limited to DAC. The Commission will determine if such language is adopted in the final rule.

The discussion then moved to the status of the CIPIMS demonstration project. The Westinghouse representative stated that ten of the original fourteen sample schedules had already been completed and that the remainder would be available by the middle of June of 2004. The NRC staff asked that NEI obtain agreement of designers of certified designs and industry on the format of the process for providing construction scheduling information to the NRC.

The NRC and NEI agreed to get together in the middle of June 2004 to discuss the four remaining CIPIMS workstreams. Any future plans for the CIPIMS project will be discussed at the next meeting.

Old Action Items Still Open :

1. The NRC will review the schedule, from the last meeting between the NRC and NEI on February 13, 2004, to determine if that level of detail is appropriate for future submittals of scheduling information to the NRC.

2. NRC will ask OGC whether the use of a dedicated server, for the receipt of proprietary information and with read-only capability, would be in violation of the requirements for dissemination of proprietary information.

New Action Items:

1. Westinghouse to obtain agreement with NEI and industry on its proposed method of dissemination of proprietary information.

2. NRC will ask OGC as to what the course of actions should be by both the NRC and a licensee if a component, on which an ITAAC completion is based, is partially damaged.

3. NEI is to take the lead in defining the reports referred to in ITAAC and the standards with which they must reply.

Project No. 0689

Attachments: 1. List of Attendees
2. Meeting Handouts

cc w/ atts: See next page

at the factory instead of at the nuclear plant site. Both the NRC and NEI agreed that given the generic nature of most ITAAC that this would be permitted.

The Westinghouse representative raised the possibility of a licensee requesting the NRC to verify ITAAC prior to issuing a COL such that if a COL were issued it would reflect that the ITAAC was already completed. The NRC staff stated that it believed the 10 CFR Part 52 proposed rule addressed such a scenario because certain design-acceptance criteria (DAC) ITAAC could be done early in the process. Subsequent to the meeting, the NRC staff confirmed that the proposed rule language does allow for ITAAC to be recognized complete prior to issuing the COL. The proposed rule language is not limited to DAC. The Commission will determine if such language is adopted in the final rule.

The discussion then moved to the status of the CIPIMS demonstration project. The Westinghouse representative stated that ten of the original fourteen sample schedules had already been completed and that the remainder would be available by the middle of June of 2004. The NRC staff asked that NEI obtain agreement of designers of certified designs and industry on the format of the process for providing construction scheduling information to the NRC.

The NRC and NEI agreed to get together in the middle of June 2004 to discuss the four remaining CIPIMS workstreams. Any future plans for the CIPIMS project will be discussed at the next meeting.

Old Action Items Still Open :

1. The NRC will review the schedule, from the last meeting between the NRC and NEI on February 13, 2004, to determine if that level of detail is appropriate for future submittals of scheduling information to the NRC.

2. NRC will ask OGC whether the use of a dedicated server, for the receipt of proprietary information and with read-only capability, would be in violation of the requirements for dissemination of proprietary information.

New Action Items:

1. Westinghouse to obtain agreement with NEI and industry on its proposed method of dissemination of proprietary information.

2. NRC will ask OGC as to what the course of actions should be by both the NRC and a licensee if a component, on which an ITAAC completion is based, is partially damaged.

3. NEI is to take the lead in defining the reports referred to in ITAAC and the standards with which they must reply.

Project No. 0689

Attachments: 1. List of Attendees
2. Meeting Handouts

cc w/ atts: See next page

Package ML041210515
Meeting Summary: ML041200740
Handouts: ML041240376

OFFICE	DIPM/IIPB
NAME	Ed Kleeh
DATE	4/30/2004

OFFICIAL RECORD COPY

Distribution for April 1, 2004, Meeting Notice

Hard Copy
IIPB R/F
JMSebrosky
MAshley

E-Mail
PUBLIC
PMNS
BBoger
CCarpenter
SRichards
DCoe
CCasto
RMcIntyre
TFoley
DThatcher
TMensah(NRR Communication Coord)
ACRS(RidsAcrsMailCenter)
MEI-Zeftway
MAshley
JBlake
RGardner
CPaulk
RWeisman
EKleeh

External E-Mail
bhupinder.singh@hq.doe.gov
tom.miller@hq.doe.gov
creid@bechtel.com
winterjw@westinghouse.com
ricciutir@aecl.cu
rjb@nei.org
hutchidf@westinghouse.com
hayafune@msn.com
ryujiiwasaki@toshiba.co.jp

Public Meeting Between NRC and NEI
on Construction Inspection Program Information Management System (CIPIMS)
April 26, 2004

Attendance Sheet

NRC	Others
Mary Ann Ashley, NRR	Russ Bell, NEI
Joe Sebrosky, NRR	Don Hutchings, Westinghouse
Thomas Foley, NRR	Jim Winters, Westinghouse
Edmund Kleeh, NRR	Rick Ricciuti, AECL
David Terao, NRR	Cal Reid, Bechtel
	Ryuji Iwasaki, Toshiba
	Shinichi Hayafune, Energy USA

Combination List:

cc: Mr. Charles Brinkman
Westinghouse Electric Co.
Washington Operations
12300 Twinbrook Pkwy., Suite 330
Rockville, MD 20852

Mr. David Lochbaum, Nuclear Safety Engineer
Union of Concerned Scientists
1707 H Street, NW, Suite 600
Washington, DC 20006-3919

Dr. Gail H. Marcus
U.S. Department of Energy
Office of Nuclear Energy, Science
& Technology
NE-1, Room 5A-143
1000 Independence Avenue, SW
Washington, DC 20585

Mr. Paul Gunter
Nuclear Information & Resource Service
1424 16th Street, NW, Suite 404
Washington, DC 20036

Mr. James Riccio
Greenpeace
702 H Street, NW, Suite 300
Washington, DC 20001

Mr. Ron Simard
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Mr. George Alan Zinke
Project Manager
Nuclear Business Development
Entergy Nuclear
M-ECH-683
1340 Echelon Parkway
Jackson, MS 39213

Mr. Thomas P. Miller
U.S. Department of Energy
NE-20, Rm. A286
Headquarters-Germantown
19901 Germantown Road
Germantown, MD 20874-1290

Ms. Marilyn Kray
Vice President, Special Projects
Exelon Generation
200 Exelon Way, KSA3-E
Kennett Square, PA 19348

Mr. Laurence Parme
Manager, GT-MHR Safety &
Licensing
General Atomics Company
P.O. Box 85608
San Diego, CA 92186-5608

Mr. Joseph D. Hegner
Lead Engineer - Licensing
Dominion Generation
Early Site Permitting Project
5000 Dominion Boulevard
Glen Allen, VA 23060

Mr. Edward L. Quinn
MDM Services Corporations
Utility Operations Division
28202 Cabot Road, Suite 205
Laguna Nigual, CA 92677

Ms. Lynn Connor
Doc-Search Associates
2211 sw 1ST Ave - #1502
Portland, OR 97201

Mr. Paul Leventhal
Nuclear Control Institute
1000 Connecticut Avenue, NW
Suite 410
Washington, DC 20036

Mr. James F. Mallay, Director
Regulatory Affairs
FRAMATOME, ANP
3315 Old Forest Road
Lynchburg, VA 24501

Ms. Patricia Campbell
Winston & Strawn
1400 L St., NW
Washington, DC 20005

Mr. W. Edward Cummins
AP600 and AP1000 Projects
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

Dr. Robert E. Gamble
Engineering Manager, ESBWR
GE Nuclear Energy
175 Curtner Avenue, MC 365
San Jose, CA 95125

Mr. Jack W. Roe
SCIENTECH, INC.
910 Clopper Road
Gaithersburg, MD 20878

Mr. Stephen P. Frantz
Morgan, Lewis, & Bockius, LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Mr. Gary Wright, Manager
Office of Nuclear Facility Safety
Illinois Department of Nuclear Safety
1035 Outer Park Drive
Springfield, IL 62704

Mr. David Ritter
Research Associate on Nuclear Energy
Public Citizens Critical Mass Energy
and Environmental Program
215 Pennsylvania Avenue, SE
Washington, DC 20003

Mr. Tom Clements
6703 Gude Avenue
Takoma Park, MD 20912

Mr. Lionel Batty
Nuclear Business Team
Graftech
12300 Snow Road
Parma, Ohio 44130

Mr. James Blyth
Canadian Nuclear Safety
Commission
280 Slater Street, Station B
P.O. Box 1046
Ottawa, Ontario
K1P 5S9

Dr. Atambir S. Rao
Project Manager, ESBWR
GE Nuclear Energy
175 Curtner Avenue, MC 365
San Jose, CA 95125 USA

Mr. Edward F. Sproat, III
Vice President - Int'l Projects
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

Mr. Vince Langman
Licensing Manager
Atomic Energy of Canada Limited
2251 Speakman Drive
Mississauga, Ontario
Canada L5K 1B2

Dr. Regis A. Matzie
Senior Vice President and
Chief Technology Officer
Westinghouse Electric Company
2000 Day Hill Road
Windsor, CT 06095-0500

Mr. Ed Wallace, General Manager
Projects
PBMR Pty LTD
PO Box 9396
Centurion 0046
Republic of South Africa

Mr. Dobie McArthur
Director, Washington Operations
General Atomics
1899 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006

May 4, 2004

Mr. Russell Bell
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

May 4, 2004