

December 14, 2004

MEMORANDUM TO: Doug H. Coe, Section Chief
Reactor Inspection Section
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: Mary Ann M. Ashley, Team Leader */RA/*
Construction Inspection Program
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SUBJECT: SUMMARY OF DECEMBER 7, 2004 MEETING WITH THE
NUCLEAR ENERGY INSTITUTE TO DISCUSS ISSUES FOR
THE CONSTRUCTION INSPECTION PROGRAM
INFORMATION MANAGEMENT SYSTEM (CIPIMS)
DEMONSTRATION PROJECT

On December 7, 2004, Nuclear Regulatory Commission (NRC) staff from the Inspection Program Branch, the New Reactors Section, Information Management Branch, and the Office of the General Counsel met with representatives from the Nuclear Energy Institute (NEI) and the nuclear industry to discuss the status of activities related to the Construction Inspection Program Information Management System (CIPIMS) demonstration project.

The 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 the attendees, Attachment 2 contains the NRC handouts for the meeting, and Attachment 3 contains the handouts from NEI.

The meeting opened with a discussion of a sample ITAAC determination package on the reactor vessel arrangement. Page 4 of Attachment 3 shows NEI's proposed letter to transmit an ITAAC determination letter to the NRC. NEI described the work that would be done by the licensee to ensure that the ITAAC was successfully completed prior to the letter being issued. Included in their description was that the documentation in support of the ITAAC would be reviewed and that open items would be reviewed to ensure that all items that may have an impact on the ITAAC had been successfully addressed and closed. NEI stressed that the documentation that directly supports an ITAAC determination may be summary information. This is because more detailed data is rolled up into reports which would in turn be approved and which may feed into other summative documents that ultimately are the basis for the ITAAC determination. NEI noted that all information related to an ITAAC would be made available to the NRC but would not be sent to the NRC as part of the licensee submittal.

The NRC discussed in general terms how the workstreams would be reviewed. The NRC anticipates that the ITAAC determination examples will be provided to the appropriate technical review group, who in turn will provide any questions, observations, or recommendations they may have on the documentation. The NRC anticipates that the feedback will be used by NEI when they develop their industry guidance for developing ITAAC determination packages. The NRC recognized that in other similar projects, NEI then requested an NRC endorsement of their guidance and that the approach in this case is likely to be the same.

The NRC discussed that the ITAAC letter from the licensee would trigger any reviews or inspections that the staff may feel is necessary to gain sufficient confidence to recommend that the Commission find that the various ITAAC have been met. The NRC noted that a letter without some summary of the underlying basis would have limited use for identifying and planning the reviews that would be needed for the NRC to have sufficient confidence to also consider the ITAAC successfully completed. The discussion also explored how much information and what level of detail might be needed. One option that was discussed was that the information used by the licensee executive signing the ITAAC determination would be an appropriate level to provide to the NRC. The NRC agreed to discuss the topic among the staff and to provide some ideas at a subsequent meeting.

During the discussion of the sample ITAAC determination package/letter, NEI identified that it is likely that a licensee would not want to wait until the end of construction to submit all of the ITAAC determinations. NEI stated that licensees would probably submit the determination once they had taken control of the component/ system. Several industry representatives provided some ideas of how they might approach recordkeeping to support an ITAAC determination. All agreed that a licensee would have a specific process that they would follow to check and validate the information supporting an ITAAC determination. However, everyone recognized that the process would vary among licensees. Members of the group also noted that the form of the records they have is also likely to vary by licensees. Some utilities may have a very comprehensive electronic system for records where others may depend to a greater extent on paper copies.

There was also a discussion on sharing schedule information. NEI again stressed that within a construction schedule, the relationship of an activity to an ITAAC must be established through the component number or activity. However, all in attendance acknowledged that the relationships within each schedule are determined by the scheduler and that there is not assurance that every project would be scheduled using the same logic. The NRC agreed that specific information needs from the schedule still needed to be determined. The NRC noted that regardless of the tool used or the logic applied in developing the schedule, it was imperative that within each project schedule consistency was important so that the CIPIMS logic would work regardless of the project.

The NRC also discussed some ideas about the logic the NRC might follow to review and close out an ITAAC determination in CIPIMS. The group discussed the flow chart. The NRC stressed that the chart was developed as a means of developing the CIPIMS specifications for that one activity. Ultimately, each activity will require the logic to be developed to ensure that all

NRC activities can be captured appropriately in CIPIMS.

The NRC discussed a planned workshop to explore the topic of what would make an inspection finding 'material' to successful ITAAC completion. The NRC announced that the workshop would take place on Wednesday, May 4, 2005 in the Auditorium of NRC Headquarters in Rockville, MD. The NRC provided 5 examples of inspections findings that will be offered for discussion at the workshop. The NRC stressed that the examples were crafted in such a way as to encourage discussion. The goal of the discussions will be to place each finding in a predefined bin and to identify the qualities of the finding were important for putting it in the specific bin. The NRC also noted that the discussion would also include defining the range of possible responses to a finding. NEI and the industry was encouraged to provide a total of 5 or 6 examples that will be considered for use at the workshop as long as they followed the form and level of detail in the NRC examples. Any examples the industry wanted to provide should be received by the NRC no later than March 15. The NRC plans on announcing the workshop in a Federal Register Notice on April 1. All examples to be used at the workshop will be available in ADAMS and referenced in the published notice so that participants will have the chance to review the examples and have had an opportunity to form their ideas before coming to the workshop.

The NRC also provided some perspective developed from a review of historical data on plant construction. One of the most important issues is that licensees must have a credible program to address employee concerns as quickly as possible - especially give the anticipated pace of new construction in the future. The industry noted that the existing programs for addressing employee concerns are more mature and function better than those in previous years. The NRC noted that a second lesson learned from the historical information is that programs and processes that work successfully at an operating plant do not always enjoy the same level of success when implemented at a construction site.

Project No. 0689

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Project No. 0689

Attachment 1, List of Attendees
Attachment 2, NRC Meeting Handout
Attachment 3, NEI Meeting Handout

ADAMS ACCESSION NUMBER: **ML043450392** PKG NUMBER: **ML043450414**

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Attendance Sheet
NRC Meeting with NEI on CIPIMS
December 7, 2004

Cal Reid	Bechtel
Spencer Semmes	Dominion
George Zinke	Entergy
Sandra Sloan	Framatome ANP
Mike Bourgeois	Entergy
Jill Clelland	Westinghouse
Don Hutchings	Westinghouse
Jim Winters	Westinghouse
Cedric Jobe	NEI
Tom Foley	NRC/IIPB
Ken Heck	NRC/IPSB
Tom Miller	DOE
Jerry Wilson	NRC/RNRP
Joseph Colaccino	NRC/RNRP
Joe Hegner	Dominion
Carl Berger	Energetics
Mary Ann Ashley	NRC/IIPB
Ben George	Southern Nuclear
Russ Bell	NEI
Robert Weisman	NRC/OGC
Jun Lee	NRC