

Comment Resolution Summary

Resolution of Comments for IMC 90002 CONSTRUCTION DEGRADED PERFORMANCE COLUMN INSPECTIONS

Source	Comment	Added	Remarks
DCI JB	General Comment: The introduction paragraphs to the inspection requirements section should be broken up into more, small paragraphs to increase readability. Consideration should be given to breaking up some of the run-on sentences for the same reason.	Yes	
DCI JB	90002-02 introduction: Split paragraph after second sentence (ending with "multiple performance issues") Start next sentence with "Although" instead of "While" to keep from having two consecutive sentences starting with "While"	Yes	
DCI JB	90002-02 introduction: Fourth sentence of new paragraph: Change "Independent NRC inspection to inspect..." to "independent NRC inspection of..." since "to inspect" is redundant to "inspection"	Yes	
DCI JB	90002-02 introduction: Split paragraph again after "...extent of cause determination." This split puts the report requirements in a separate paragraph.	Yes	
DCI JB	90002-02 introduction: Paragraph starting with "Significant weaknesses in..." Split first sentence after "agency actions" Delete "including:" and replace with "Additional actions could include" in order to break up the run-on sentence.	Yes	
DCI JB	90002-02 introduction: Paragraph starting with "In general, licensees..." Split paragraph after "addresses and corrected."	Yes	

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DCI JB	90002-02 introduction: In discussion of corrective action program evaluation, change “biennial” to “annual” since IP35007 requires annual inspections of construction corrective action programs.	Yes	Deleted the word biennial and let it open due to the fact that the Regions have the freedom to go and inspect the CAP when necessary to verify its effective implementation during the beginning of construction.
DCI JB	90002-02 introduction, final sentence, change IMC 0612 to IMC 0613.	Yes	
DCI JB	Section 02.04: Delete reference to IMCs 2501 and 2502 since the level of activities associated with these IMCs would not trigger an IP 90002 reaction. These activities would likely be completely shut down at the IP 90001 response level.	No	Agree with coment but let them in the docment for completion. It gives the whole picture of the inspection program.
DCI JB	Section 02.04: Delete reference to IP 35007 since the procedure is listed in IMC 2502 and IMC 2504 and is therefore redundant in this context.	Yes	
DCI JB	Section 02.04: Regarding the “key objectives of the construction inspection program as stated in IMC 2506;...”: Provide some explanation of what is meant by this phrase since IMC 2506 does not identify any part, or parts, of the construction inspection program as the “key objectives.”	No	Removed the word “key”. IMC 2506 does describe the general objectives of the construction program in sectionsXXXXX
DCI JB	General Guidance: End of first paragraph: In discussion of corrective action program evaluation, change “biennial” to “annual” since IP35007 requires annual inspections of construction corrective action programs.	Yes	See previous comment on the CAP
DCI JB	Section 03.02 a. Paragraph after a.8. ‘Pareto Analysis’ starting with “The licensee may...” should be paragraph 03.02 b. and subsequent paragraphs re-numbered to keep from having two a.1 through a.3 paragraphs.	Yes	

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DCI JB	Section 03.05 c. Final Sentence: IMCs 0613 and 2505 do not provide direction for the disposition of safety culture issues as weaknesses. It would seem that in the case described, (NRC identified after licensee evaluation did not recognize,) the disposition should be a violation.	Yes	Modified to reflect the fact that the characterization of asafety culture issue and a violation are related but separate. IMC cited will guide inspectors to deemine if licensee failure to recognize should be a violation as well as tag it with the corresponding SC aspect.
R-I	90002-003 INSPECTION GUIDANC 1 st paragraph end of the third sentence propose adding the following sentence: Consideration should be made for the advantages of doing a brief inspection shortly after the problem occurrence to see the conditions and conduct interviews with those having first-hand knowledge of the situation.	Yes	No remarks necessary if comment is incorporated in full. Added words to the effect that the responsibility for such a decision falls on regional management and their assessment of the conditions at construction site
R-I	<u>Definitions</u> Propose adding the following to the definition section: <u>Safety Culture Consideration</u> - add the definition	No	Section 02.05 states the goal for safety culture consideration
R-I	03.01 <u>Problem Identification</u> b. add <u>by</u> to the second sentence in the following location: should have been detected <u>by</u> post-construction	Yes	

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	90002-04 RESOURCE ESTIMATE		
R-I	<p>Propose adding the following at the end of the paragraph:</p> <p>Use of this inspection procedure is initiated by management direction or if specifically required by the construction inspection program.</p>	Yes	
R-IV	<p>The draft procedure does not consider evaluation of the licensee's "stop work" program. As a result of lessons learned involving programmatic issues at construction sites, provisions were established for stop work orders. These stop work orders were implicit in the applicants corrective action program and they were designed to address emergent conditions that represented a significant challenge to the quickly of construction activities (i.e., multiple examples of inadequate control of weld filler material). Therefore, the evaluation of this process to limit the extent of cause for significant conditions adverse to quality should be considered within the scope of IP.</p>	No	<p>The comment is valid. After internal discussion we decided to address this in more detail in IP35007 procedure which looks at programs at the site. Stop-work process was added to on of the things to consider inspecting for a licensee;s CAP [03.03.a]</p>
R-III	No Comments	n/a	n/a