



AP1000

Construction Inspection

**Feedback on Observations,
Perceptions, & Lessons Learned**



Construction Inspection:

Verification that the design, as implemented in facility construction, conforms to the licensing basis



The Licensing Basis

- **Maintaining the current licensing basis (CLB) requires perpetual rigor**
- **Impact of the CLB must propagate to the entire consortium design authority for every construction activity**
- **Change process and associated tools in place to aid configuration control, and incorporated in COLs**
 - **ISG-25**
 - **NEI 96-07**



Observed Licensee Challenges

Documented inspection examples:

- **SSC construction on-site (Vogtle basemat)**
 - **understanding change process**
 - **understanding impact on CLB**
- **SSC development off-site (PMS)**
 - **understanding of CLB**
 - **understanding of associated ITAAC**



Perceptions

- All levels of consortium design authority may not be conditioned to the CLB concept (think operating fleet)
- Licensee oversight/engagement of construction activities appears to be inconsistent
- Design authority's extensive Part 50 credentials may not translate to the Part 52 environment



Lessons / Takeaways

- **Understand the construction environment and inspection/regulatory envelope**
 - **Part 52 vs Part 50**
 - **Scope and scrutiny**
- **Understand the ITAAC language and intent**
- **Licensee oversight should provide both technical and licensing perspective**