

Inspections related to pending LARs and PARs



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ISG-25 Interim Staff Guidance on Changes during Construction

- Provides guidance on information to be included in Preliminary Amendment Requests (PARs)
- “No Objection” letter needed prior to start of construction.
- Information in PAR is reviewed to determine impact to inspections and ITAAC.
- HQ communicates description of proposed change and impact on associated ITAAC to Region II to inform their inspection process.

Inspector Expectations

- The inspection staff will be informed about LARs that could impact inspectable areas.
- To the extent possible, Inspections will not be scheduled for in process LARs.
- If inspections are desired prior to LAR review completion and the inspectors identify a change from the Current Licensing Basis (CLB) that is identified in a PAR, the Inspectors will document their potential findings as an Unresolved Item (URI)

Documenting Inspection Results

- If LAR is subsequently approved, Inspector will verify that their observations are in agreement with the approved license amendment and the URI is closed with no violation.
- If LAR is subsequently denied, Inspector will verify that the licensee returned component to its CLB.
 - If component was returned to CLB, URI closed – no violation
 - If component was NOT returned to CLB, URI closed - VIOLATION

Inspecting Non-PAR/LAR Changes

- Not all Changes during Construction Require a PAR/LAR prior to being implemented.
- Changes to Tier 2 items can be made by the licensee under 10 CFR 52, App. D, Section VIII B.5 as long as the change has been evaluated and determined not to meet any of the criteria requiring a license amendment:
 - i.e. it does not result in a more than minimal increase in frequency of occurrence of an accident previously evaluated in the plant-specific DCD, not a change to Tier 1, etc.

Inspecting Non-PAR/LAR Changes

- If during an inspection, an Inspector discovers a change to a Tier 2 item, that change would be evaluated as follows:
 - If the licensee has not evaluated the change required by 10 CFR 52, App. D, Section VIII B.5 it would be a violation and may result in a finding if it is more than minor
 - If the licensee has evaluated the change
 - It typically would not result in a violation as long as the inspector agrees it did not require a license amendment.

Questions

Example

- Inspectors go to a site for a rebar inspection. UFSAR states stud spacing shall be no greater than 6". Licensee has submitted a PAR/LAR to increase spacing to 8".
- No objection letter has been received.
- Inspectors find stud spacing is 8" what actions should they take?

Example - Continued

- Inspectors document their observations as an Unresolved Item (URI)
- If LAR is approved. Inspectors verify their observation is in agreement with LAR.
 - URI Closed – No violation
- If LAR is denied. Inspectors verify Licensee has returned stud spacing to 6" (UFSAR requirement)
 - If licensee returned stud spacing to 6", URI closed – No violation.
 - If licensee didn't return stud spacing to 6". URI closed - VIOLATION