



CONSTRUCTION ASSESSMENT PROGRAM OPTIONS

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Speakers and Topics

Bill Borchardt, EDO: Introduction

Mike Johnson, NRO: Agenda

Timothy Frye, NRO: Options

Charles Ogle, Region II-CCI: Current
Assessment Program Experience

John Tappert, NRO: Next Steps

Agenda

- Construction Assessment Program
 - Background, options, staff's recommendation and basis
- Experience With Current Assessment Program
- Summary and Next Steps

Background

- SECY paper 08-0155
 - Traditional Enforcement
- SRM M081022
 - Reconsider Assessment Program and Propose Policy Options
- Options developed by staff
- NEI proposal
- SECY Papers 09-0113 and 10-0140

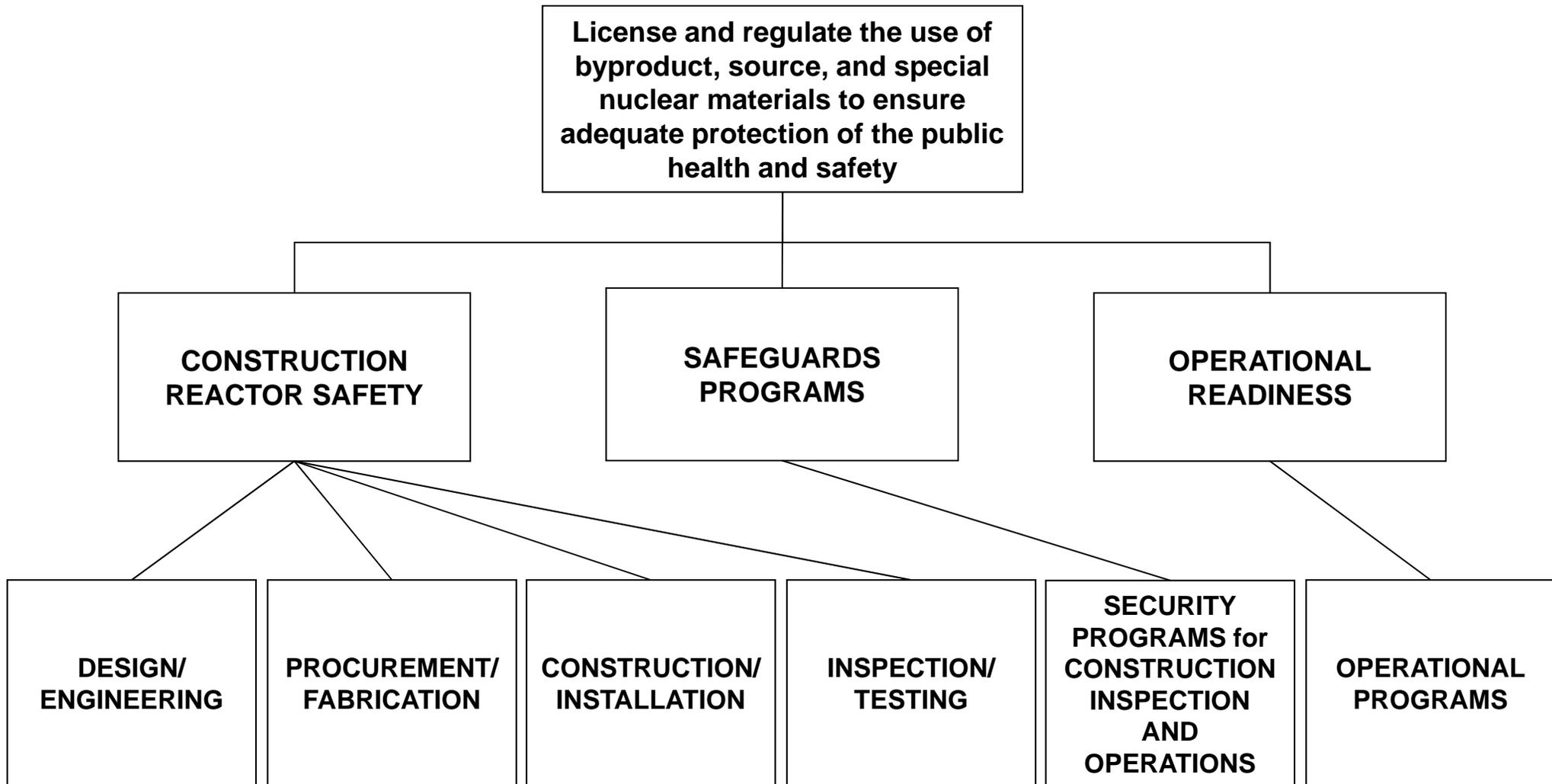
Elements Considered

- Construction Regulatory Framework
- Construction SDP
- Construction PIs
- Construction Action Matrix
- Approach to Areas Important to Safety-Culture

Regulatory Framework

- Tiered approach
 - 3 strategic performance areas
 - 6 construction cornerstones
- Provides added structure to construction oversight process
- NRC response would be based on cornerstone performance

Regulatory Framework



Construction Action Matrix

- Current assessment process includes an action matrix
- Provides for a range of actions commensurate with results
- Input is traditional enforcement
- Actions are graded
- Matrix can accommodate future changes

Construction Significance Determination Process

- How to measure construction risk
- SDP vs. Traditional Enforcement
- Staff envisions use of 3 construction SDPs
- SDPs need to be finalized and piloted

Performance Indicators

- Licensees use metrics for project management
- Metrics and thresholds provide limited regulatory insight
- Staff recommends deferring further development of PIs
- Evaluate the use of PIs during annual self-assessments

Safety Culture Approach

- Implemented approach to safety culture that is similar to the ROP approach
- NRO staff involved with draft safety culture policy statement
- Revisit approach when broader agency actions are complete

Options

- 1) Status quo
- 2) Implement regulatory framework; continue to disposition findings using traditional enforcement
- 3) Implement regulatory framework; disposition findings using construction SDP

Staff Recommendation

- The staff recommends Option 3.
 - Provides for the most objective approach to assessment
 - Work to-date indicates that construction SDP is viable
 - Continue development and pilot
 - Substantive agreement with stakeholders on Option 3

Construction Oversight

- Ongoing at Vogtle, WB2, LES, and MOX
- Some common elements among the programs and with the cROP
 - Oversight includes inspection, enforcement and assessment
 - Ability to escalate NRC actions
 - Results are public

Construction Oversight

- cROP Differences
 - More structured significance process
 - Pre-defined action matrix

Construction Oversight Results

- Oversight processes working
- Appropriate and timely response to identified issues
- Staff has a good sense for thresholds including minor violation threshold

Regulatory Response

- NRC identified one escalated enforcement item during recent construction activities
- Would be a white finding if a construction SDP was used
- NRC response would be similar whether traditional enforcement or SDP is used

Next Steps

- CCI engaged with development of this proposed process and supports option 3 for cROP
- Significance based process offers benefits and challenges
- Pilot valuable

Summary

- Near term considerations
- Proceed consistent with Commission direction
- Considered stakeholder views when developing SDP
- Pilot before full implementation

List of Acronyms

- CCI – Center for Construction Inspection
- cROP – Construction Reactor Oversight Process
- EDO – Executive Director for Operations
- ITAAC – Inspections, Tests, Analyses and Acceptance Criteria

List of Acronyms (cont.)

- NEI – Nuclear Energy Institute
- NRC – Nuclear Regulatory Commission
- NRO – Office of New Reactors
- NRR – Office of Nuclear Reactor Regulation
- PIs – Performance Indicators
- ROP – Reactor Oversight Process

List of Acronyms (cont.)

- SDP – Significance Determination Process
- SECY – Office of the Secretary
- SRM – Staff Requirements Memoranda
- SSCs – Structures, Systems and Components