

PREOPERATIONAL TEST PROGRAM IMPLEMENTATION

PROGRAM APPLICABILITY: 2513

70302-01 INSPECTION OBJECTIVE

Ascertain that the applicant has implemented administrative controls over the preoperational testing program.

70302-02 INSPECTION PROGRAM

02.01 Test Program

- a. Verify, by interview with the Test Program Director, that he is familiar with the general description of the test program. Verify that he is aware of his responsibilities in the conduct of the test program.
- b. Select five tests at random from the test program index. Verify that they have been or are scheduled to be completed as part of the preoperational test program.

02.02 Test Organization

- a. Verify, by review of personnel records or direct interview, for at least three key personnel, that they meet the specified qualification requirements.
- b. Verify, by direct interview, that the following is understood by the Test Program Director:
 1. responsibilities of key test personnel
 2. method and responsibility for appointing test personnel
 3. lines of authority and responsibility
 4. organizational interfaces for organizations involved in the test program

02.03 Document Control

- a. Select three recently approved test procedures. Verify that the review and approval were in accordance with administrative procedures.

- b. Select ten drawings or vendors' manuals which are being used by test personnel and verify that they are current issues by comparison with master indices.
- c. Select one field changed drawing, and verify that the change was referred to the design engineer for review and revision of drawings.

02.04 Design Changes and Modifications

- a. Review three design change packages to determine reviews, processing, and implementation were according to procedural controls.
- b. For modifications reviewed in 02.04a, verify that appropriate changes were made to test procedures. If preoperational testing on the system/component had been accomplished before the design change, verify that previous test data have not been invalidated, or that retesting is accomplished, as appropriate.
- c. For design changes reviewed in 02.04a, verify that the cognizant engineer is or will be aware of the change.

02.05 Verify by direct questioning of two of the following personnel, that they are familiar with administrative controls covering the conduct of corrective maintenance and preventive maintenance during preoperational testing:

- a. Operations Supervisor
- b. Mechanical Maintenance Supervisor
- c. Electrical Maintenance Supervisor
- d. I&C Supervisor
- e. Test Engineer
- f. Craftsman or Technician

02.06 Verify, by review of training records for, or direct interview of, two test personnel, that they have received the required training. This training should include:

- a. administrative controls for testing
- b. QA/QC indoctrination
- c. technical training, as appropriate

70302-03 INSPECTION GUIDANCE¹

This inspection procedure is intended to verify implementation of the licensee's overall program for preoperational testing administration. This inspection should be performed early in the preoperational test program; but not until testing of safety-related systems is well under way.

03.01b Test procedures selected should be consistent with the requirements of Regulatory Guide 1.68 and FSAR commitments.

¹ The digits following the "03" numbers in this section refer to the equivalent digits following the "02" numbers in Section 70302-02, "Inspection Requirements." For example, 03.055 offers specific guidance for Section 02.055.

03.02a Some job positions require a specified amount of nuclear power plant experience. Applicable working experience obtained during construction and preoperational testing may be counted toward the work experience requirement. Observation of others performing applicable functions should not be considered acceptable experience.

Qualification requirements may be specified by reference to FSAR commitments.

03.03c Recent changes (i.e., those completed during the past three to six months) may not be reflected in formally revised "as-built" drawings. However, the inspector should expect to locate, at the site, official marked-up or working copies of as-built drawings which would reflect all of the latest changes or modifications. The procedure for revising drawings to accommodate field changes should also be verified to be functioning to assure "as-built" conformance.

03.05 The guidance provided in ANSI N18.7-1976 for establishing administrative control requirements for maintenance during plant operations is generally applicable to the preoperational test phase.

03.06 ANSI/ASME N45.2.6-1978, which is endorsed by Regulatory Guide 1.58, requires that qualification records, including training received, shall be kept for personnel involved in inspection, examination, or testing, including preoperational testing.

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