

SECTION III

INSPECTION GUIDANCE

1. For the first unit at a site, IE will conduct a meeting with corporate management 12 to 18 months prior to scheduled fuel loading. For subsequent units at the same site, the Regional Director may determine that the meeting would be redundant and elect to not schedule this meeting. If scheduled, the meeting should be conducted according to the outline in Section II.

As a consequence of the change in emphasis from construction to operations, the operating people in the licensee's organization become the key people in the meeting. The Corporate officer responsible for operation, the station superintendent, and the head of the safety committee are normally the three people from the licensee whose presence is most essential, plus the NSSS startup manager. Since construction is still continuing at a high level of activity, key engineering, construction and QA management personnel should also be included, for both the licensee and his major contractors. In addition, principal members of the station superintendent's staff and top management officials in the areas of power production and system load dispatching should be present. Participation of the latter is important because of the unique safety requirements of a nuclear plant in relation to maintenance of off-site power connections and to the need for special attention to load dispatching during the startup and testing phase of operation.

2. In addition to having QA responsibilities regarding design and construction, the licensee corporate management must provide for the timely training and development of the operating organization to allow for adequate licensee participation in the development and implementation of the pre-operational testing program and to otherwise adequately prepare for subsequent operations. Of prime concern to the licensee is the development of a quality assurance program that will assure the adequacy of operation of safety related systems, structures, and components throughout the plant's operating lifetime.

It is the intent of the second corporate management meeting, required by this procedure, to review the licensee's quality assurance program and the project status with regard to construction, to obtain assurance that management has fully recognized the applicability of the quality assurance criteria to the preoperational and operational aspects of

Second Corporate Management Meeting

Procedure No. 30301B

Issue Date: 1/1/78

the project, to determine whether the development of the preoperational testing program and the quality assurance program regarding testing, operations, inservice inspection, maintenance, and repair are proceeding on a timely basis, to obtain a general understanding of the delegations of responsibilities regarding preoperational and startup testing made by the licensee to the NSSS or other contractors, and to describe to the licensee the scope of the inspection program as the project progresses from the construction phase to the operations phase.

3. The LER system was developed for the primary purpose of gathering information relative to licensed facilities. Many of the LERs for a given plant are generated during startup testing and the early phase of operation. This concentration of reportable events during the early stage of operations could be indicative of weaknesses in the preoperational test programs. The licensees should be made aware of this and afforded the opportunity to consider problem experience at similarly designed plants when they are developing their preoperational test programs. It may be desirable to provide some examples of events that might have been prevented by more thorough testing.
4. This meeting should include the Regional Director, the Branch Chief or Deputy Director, responsible Section Chiefs, and the assigned inspectors. IE management participation is essential to provide necessary emphasis to the licensee's corporate officers of the importance of this meeting.

SECTION II

INSPECTION REQUIREMENTS

1. This inspection consists solely of meeting with licensee management, held between 12 and 18 months prior to scheduled fuel loading.
2. Topics to be discussed are listed below in the form of a recommended agenda.
  - a. A review by IE of the subjects discussed in the first corporate level interview, to the extent that the inspection history and the new people involved indicate that it is appropriate.
  - b. A review by IE of the construction problems noted during previous inspections that are outstanding and may affect the licensing process, as well as a description of the remaining inspection effort related to construction.
  - c. A brief presentation by the licensee of the QA program to be used to implement the 18 AEC QA criteria applicable to the planning and implementation of the preoperational testing program, fuel loading, startup and power ascension testing, routine operations, inservice inspection, maintenance, and repair, as outlined in the administrative section of the proposed technical specifications and in the FSAR.
  - d. A discussion of the provisions in the FSAR that IE will inspect against with respect to the licensee's preparations for testing and operations.
  - e. A discussion by IE of the IE program for selective review of test procedures, test results, and operating instructions, including the need for IE to obtain selected procedures for review purposes.
  - f. A discussion by IE of IE inspections against the technical specifications and 10 CFR 50.59 after issuance of an Operating License.
  - g. A summary by IE of the deadlines for completion of the following program to facilitate review.
    - QA Program for Operation
    - Construction Verification Tests
    - Preoperational Test Program

Second Corporate Management Meeting

Procedure No. 30301B

Issue Date: 1/1/78

- Preoperational Test Procedures
  - Startup Test Program
  - Initial Core Loading Procedures
  - Low Power Test Procedures
  - Power Ascension Test Procedures
  - Administrative, Operating, Maintenance and Emergency Procedures.
- h. A discussion by IE of the LER System to emphasize the importance of licensee utilization of operating experience at other plants of similar design during the development of the preoperational test program.