



U.S. NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

Inspection Manual Chapter 2504

“Construction Programs Inspection”

A Regulatory Perspective

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Overview

- **Current IMC 2504 (issued 10/07) covers inspection of:**
 - **Construction Programs**
 - **Pre-op Testing**
 - **Operational Programs**
 - **Start-up Testing**



Overview (cont.)

- **IMC 2504 to be implemented concurrent with IMC 2503 (ITAAC Inspection) during construction phase**
- **Lessons learned identified that 2504 enhancements are needed to address a realistic Part 52 construction environment**



Current vs Proposed IMC 2504

- **Current**
 - >50 discrete sub-tier IPs called out
 - overlapping and redundancy in IP usage over various construction stages
 - some IPs no longer applicable
- **Proposed**
 - consolidation and streamlining IPs
 - eliminate IPs that don't apply



Objective

- ***Modify IMC 2504 and sub-tier inspection procedures, as necessary, to provide clarity and optimization of Programs inspection guidance for facilities constructed under 10 CFR 52***

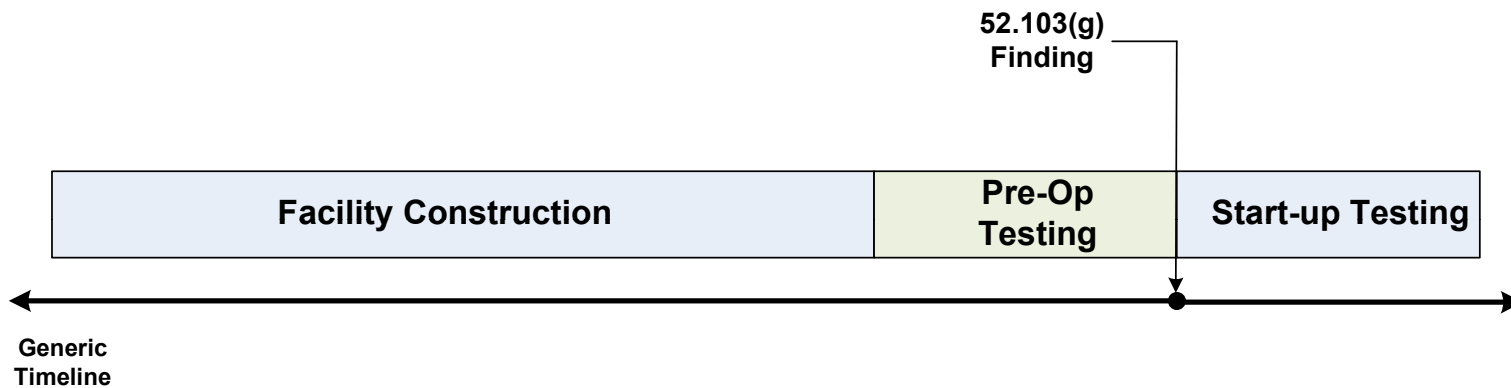


IMC 2504 Scope

- **Construction programs**
 - Quality Assurance
 - Fitness for Duty
 - Defect & Non-compliance reporting
- **Pre-operational Testing programs**
- **Operational programs**
 - Outlined in SECY-05-0197
 - ~16 discrete programs (EQ, FP, etc.)



COL Inspection and Assessment Timeline (Notional)



IMC 2503 – ITAAC Inspections	
IMC 2504 – Construction and Operational Programs Inspection	IMC 2514 – S/U Testing Phase
IMC 0613 – Documenting Part 52 Construction and Test Inspections	
IMC 2505 – Periodic Assessment of Construction Program	



Modified IMC 2504 Features

- Consolidation of redundant procedures
- New IPs to address unique Part 52 requirements (EDV and ITAAC management)
- Basis for each Program inspection identified
- Inclusive of all Programs
- Start-up Testing elements removed; conducted under IMC 2514



Consolidation Example: QA

- Staff envisions:
 - one inspection procedure, with content borrowed from existing IPs, to address construction QA
 - and*
 - one procedure to address operational QA programs



Development Schedule

- **Major Milestones**

- IMC 2504 and Construction Program IPs complete **End FY09**
- Remaining 2504 IPs complete **End FY10**



Questions / Discussion