

**Comments on  
Draft Implementation Plan to Ensure NRC Staff Readiness for AP1000 Operations, Revision 0**

No.	Section, Page, Text	Comment
1.	III.E, page 9 (see also III.F)	<p>This section states:</p> <p><i>"If there is a greater-than-green finding identified before the 10 CFR 52.103(g) finding, the staff is required to conduct the required supplemental inspection specified in the cROP Action Matrix. If the supplemental inspection is successfully completed prior to the 10 CFR 52.103(g) finding, the staff will close the greater-than-green finding, and the finding will also be considered closed for future assessment purposes under the ROP Action Matrix. However, if the required supplemental inspection is not completed before the 10 CFR 52.103(g) finding, the greater-than-green finding will remain open and will be assigned to the ROP cornerstone that is most closely related to the finding and the finding will be considered as an input to the ROP Action Matrix upon initial implementation of the ROP."</i></p> <p>While we would not want to see the 103(g) finding delayed to resolve a construction greater-than-green finding, the NRC's proposal seems contradictory. The 103(g) finding means that the commission has concluded that the ITAAC have been completed, the plant is completed in accordance with design, and is ready for fuel load. How, then, would a construction inspection finding apply to evaluating performance of the operating plant?</p> <p>In addition, it is not clear how the NRC would judge the resolution of a greater-than-green construction-related finding held open past the 103(g) finding. The significance of the construction-related finding would be evaluated using the construction SDP (IMC 2519). The NRC proposes to map the open finding to a corresponding cornerstone of the ROP, where the basis for significance determination (IMC 0609) is completely different. Adding to this complexity, different inspection procedures would apply (IP 9500X vice IP 9000X) to the supplemental inspection needed to resolve the greater-than-green finding.</p> <p>We would suggest that the NRC choose a different path for closing a greater-than-green construction finding that remains open at the time of the 103(g) finding. We suggest the following: (a) treat the construction-related finding outside of the operational ROP; (b) conduct the supplemental inspection using the applicable construction inspection procedure; (c) close the construction-related finding in accordance with the criteria of the construction inspection procedure. If NRC remains on its proposed path of rolling over construction-related findings past</p>

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		the 103(g) finding and re-mapping them to the operational ROP, the NRC should invoke the Action Matrix deviation process to recognize that construction-related findings are not additive to operations-related findings.
2.	III.F, page 9	<p>As in the comment above, the NRC states:</p> <p><i>"If the supplemental inspection is successfully completed prior to the 10 CFR 52.103(g) finding, the staff will close the greater-than-green finding, and the finding will also be considered closed for future assessment purposes under the ROP Action Matrix. However, if the required supplemental inspection is not completed before the 10 CFR 52.103(g) finding, the greater-than-green finding will remain open and will be assigned to the ROP cornerstone that is most closely related to the finding and the finding will be considered as an input to the ROP Action Matrix upon initial implementation of the ROP."</i></p> <p>The industry comment on section III.E applies to section III.F as well.</p>
3.	III.G, page 9, fourth sentence	<p>This section makes the following statement:</p> <p><i>"Inspections of the development of operational programs <u>after</u> the 10 CFR 52.103(g) finding will be conducted using applicable inspection procedures specified by IMC 2504."</i> [emphasis added]</p> <p>It is unclear what inspections are referred to, as IMC 2504, states:</p> <p><i>"To specify the inspection policies for reviewing, <u>prior to the Commission's 10 CFR 52.103(g) finding, the operational programs described in the FSAR, for a plant licensed in accordance with 10 CFR Part 52.</u>"</i> [emphasis added]</p> <p>And</p> <p><i>"The purpose of these inspections is determine the status of the <u>operational programs prior to the Commission's 10 CFR 52.103(g) finding</u> and to determine the adequacy of the preoperational testing portion of the initial test program conducted by the licensee."</i> [emphasis added]</p>
4.	III.G, page 9, last two sentences	<p>This section states:</p> <p><i>"The significance of operational program development findings identified after the 10 CFR 52.103(g) finding will be determined using the guidance in IMC 2519. The operational program development findings identified after the 10 CFR 52.103(g) finding will be assigned to the ROP cornerstone most closely related to the finding, and significance of the finding will be</i></p>

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		<p><i>considered for determining the appropriate ROP Action Matrix column in accordance with IMC 0305."</i></p> <p>As noted in the previous comments on Section III.F, resolving a greater-than-green finding that was evaluated using the construction SDP (IMC 2519) and was re-mapped into the operational ROP, where a different SDP (IMC 0609) is applicable, is problematic.</p>
5.	III.L, page 10 III.M, page 10	As noted in previous comments, resolving a greater-than-green finding that was evaluated using the construction SDP (IMC 2519) and has been re-mapped into the ROP where a different SDP (IMC 0609) applies, is problematic.
6.	III.O, page 11 and Table 1, page E1-2, entry for MSPI	This paragraph does not reflect previous discussions on applicability of MSPI to AP1000 that occurred at several ROP public meetings in 2015-2016. From those ROP public meetings, we understood that the staff had concluded that further pursuit of PI modifications for the AP1000, particularly an MSPI modification, would not likely bear fruit. Therefore, the staff concluded that it should pursue inspection modifications to cover the areas in which performance indicators would not be practical.
7.	III.P, pages 11-12	<p>This section proposes to treat certain performance indicators as invalid until <i>"...sufficient time has passed to accumulate enough representative data to provide a valid assessment result."</i></p> <p>What would happen if a unit has not reached 7,000 critical hours in the first four calendar quarters (first year) after initial criticality? How would NRC treat Unplanned Scrams per 7,000 Critical Hours and Unplanned Power Changes per 7,000 Critical Hours for a unit in this situation?</p> <p>On page 12, the NRC states, <i>"To establish the necessary baseline of critical hours to prevent falsely inflating the <u>data</u>, these indicators will become valid after four full calendar quarters have passed once critical hours have occurred."</i> [emphasis added.]</p> <p>We suggest replacing the word "data" with the word "indicator value".</p>
8.	Figure 1, page 16	<p>Note 2 says, <i>"Significance determination for findings associated with operational program development inspections and ITAAC subject to a hearing in accordance with IMC 2519."</i></p> <p>IMC 2519, "Construction Significance Determination Process", does not mention the word "hearing". Please explain what hearing is referred to in Note 2 or revise Note 2 to clarify that hearing is being referred to.</p> <p>Interestingly, Figure 1 does not depict what Section III labors to</p>

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		describe, i.e., the closure of greater-than-green construction findings that may not be closed prior to the 103(g) finding.
9.	Table 1, page E1-2, entry for Safety System Functional Failures	<p>The entry under <i>"When PI becomes Valid"</i> states, <i>"This PI becomes valid when the mitigating systems cornerstone becomes valid."</i> The entry under "Comments" states, <i>"...the PI should become valid the first quarter in which 10 CFR 50.73, 'Licensee event report system,' becomes applicable after the MS cornerstone has been transitioned to the ROP."</i></p> <p>If the above entries are equivalent, why are they written differently? If the above entries are not equivalent, why is conflicting direction presented in this table?</p>
10.	Enclosure 2	Several items in this table state "None specified" under Implementation Milestone when there is a milestone. For example the milestone for Item 5, Reactor Vessel Material Surveillance Program is "before initial criticality" (VCS COL).