April 7, 2004

TO: Douglas H. Coe, Section Chief
Construction Inspection Program
Inspection Program Branch
Division of Inspection Program Management, NRR

FROM: Mary Ann Ashley, Team Leader
Construction Inspection Program **/RA/**
Inspection Program Branch
Division of Inspection Program Management, NRR

SUBJECT: SUMMARY OF APRIL 1, 2004, MEETING WITH NUCLEAR ENERGY INSTITUTE TO DISCUSS SAMPLE SCHEDULES FOR THE CONSTRUCTION INSPECTION PROGRAM INFORMATION MANAGEMENT SYSTEM DEMONSTRATION PROJECT

On April 1, 2004, Nuclear Regulatory Commission (NRC) staff from the Inspection Program Branch, the New Reactor Licensing Section, the Information Management Section, and the Office of the Chief Information Officer (OCIO) met with representatives from the Nuclear Energy Institute (NEI) to discuss two detailed, non-proprietary example schedules developed by Westinghouse for the Construction Inspection Program Information Management System (CIPIMS) demonstration project. Both examples were for schedules of pertinent work activities to meet Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) for the Advance Boiling Water Reactor (ABWR) certified design. The first example was for one ITAAC for the Turbine Gland Seal System and the second example was for one ITAAC for constructing the Nuclear Island Buildings in a manner so that all deviations with the Design Description were reconciled.

This meeting was classified as a Category 2 meeting which provided an opportunity for members of the public to discuss regulatory issues with the NRC. Attachment 1 is a list of attendees. The meeting minutes and handout can be accessed through the Agencywide Documents Access and Management System (ADAMS) under Accession Nos., respectively, ML040960298 and ML040960230.

The NRC staff discussed the necessity of both the NRC and NEI having a common language and common understanding of the type of information and its format to be submitted to the NRC for scheduling inspectors prior to and during the construction of a plant licensed under 10 CFR 52.

The representative from Westinghouse discussed in detail the basis for the format of the schedule for the work activities for meeting ITAAC 2.10.9.1 for the Turbine Gland Seal System. The schedule was submitted in both a Gantt Chart format and a data report that listed some of the preceding work activities required for meeting and verifying this particular ITAAC. The schedule was simplified by utilizing the immediate first level of predecessors not those further back in time. The Westinghouse representative stated that one possible benefit of the CIPIMS

demonstration project will be to better define the work activities prior to and after issuance of a Combined Operating License (COL).

During this discussion, the NRC and NEI were unable to agree on how much of the overall master construction schedule, for building a new plant, would be submitted to the NRC by a licensee. The major points of contention were the number and type of predecessors required to be listed as prerequisites for completing a particular ITAAC, the detail to be represented for constructing a specific module offsite, and how to deal with proprietary information so it is not in the public domain. The NRC would like the whole master schedule in order to effectively and efficiently use inspection resources but NEI would like to limit the scheduling information to what is actually needed by the NRC so as not to be overly burdensome to either the NRC or the licensee. The representative of Westinghouse stated that a better example of the level of detail that could be utilized was shown in the sample schedule previewed but not distributed at the last meeting between the NRC and NEI on February 13, 2004. The NRC plans to review that sample schedule after Westinghouse removes all proprietary information from it and the NRC receives it.

The NRC and NEI agreed to use a rolling-window approach for scheduling information so that more detail is provided for those work activities to be completed near term and less detail for those activities to be completed for example six to twelve months in the future. In regard to the level of detail represented in a schedule for constructing a module, the NRC proposed that a licensee have some means in the schedule to alert the NRC that a module is being built other than just the start and finish dates. The NRC and NEI did not fully agree on whether or not the detailed schedule for a sub-vendor, assigned to build a module offsite, would be included in the scheduling information provided to the NRC.

The representative from Westinghouse then discussed the schedule for the work activities for meeting ITAAC 3.3.2.a for constructing the Nuclear Island structures. The schedule was submitted only as a data report that listed some of the preceding work activities required for meeting and verifying this particular ITAAC. The schedule was simplified by utilizing the immediate first level of predecessors not those further back in time. This particular ITAAC required a report which reconciled all deviations identified during construction with the approved design. The NRC and NEI agreed that it was necessary to determine where the supporting information for this and similar reports would reside.

The Westinghouse representative stated that the scheduling information, to be sent to the NRC, would be more understandable if it was in the Program Evaluation and Review Technique (PERT) format. This lead to a discussion on the viability of the PERT chart as the method of providing scheduling information to the NRC since it was a derived product and could not be queried for different sorts. The NRC said it was better to provide them the whole schedule and then they would determine how the data would be formatted so that different sorts could be obtained, like for example, all the line items for a singular type of activity related to an ITAAC or all the precursors for a particular ITAAC.

NEI stated that they would prefer to send proprietary information to the NRC resident office at a plant site rather then to NRC headquarters. The NRC said it did not matter where proprietary information was sent unless some means was provided for preventing it from getting into the public domain. Both the NRC and NEI agreed that it would be beneficial if one means for providing the proprietary scheduling information to the NRC could be approved just once by OGC and be available for all licensees.

The NRC and NEI agreed to get together during the week of April 26th to discuss two more CIPIMS workstreams. Any future plans for the CIPIMS project will be discussed at the next meeting.

Action Items:

1. Westinghouse will provide a version of the schedule, from which all proprietary information has been gleaned, from the last meeting between the NRC and NEI on February 13, 2004, to the NRC.

2. The NRC will review the schedule, from the last meeting between the NRC and NEI on February 13, 2004, to determine if that level of detail is sufficient for all future submittals of scheduling information to the NRC.

3. NEI will determine where the supporting data for deviation reports and similar reports should reside.

4. NRC will ask OGC whether the use of a dedicated server, for the receipt of proprietary information and with read-only capability, would be in violation of the requirements for dissemination of proprietary information.

5. Westinghouse will provide to the NRC PERT charts for each of the example schedules discussed at this meeting.

6. Westinghouse will provide to the NRC an example of a two-week rolling schedule.

7. Westinghouse will try to find a workstream that contains both electrical and instrumentation and control (I&C) components.

Project No. 0689

Attachments: 1. List of Attendees
2. Meeting Handouts

cc w/atts: See next page

NEI stated that they would prefer to send proprietary information to the NRC resident office at a plant site rather then to NRC headquarters. The NRC said it did not matter where proprietary information was sent unless some means was provided for preventing it from getting into the public domain. Both the NRC and NEI agreed that it would be beneficial if one means for providing the proprietary scheduling information to the NRC could be approved just once by OGC and be available for all licensees.

The NRC and NEI agreed to get together during the week of April 26th to discuss two more CIPIMS workstreams. Any future plans for the CIPIMS project will be discussed at the next meeting.

Action Items:

1. Westinghouse will provide a version of the schedule, from which all proprietary information has been gleaned, from the last meeting between the NRC and NEI on February 13, 2004, to the NRC.

2. The NRC will review the schedule, from the last meeting between the NRC and NEI on February 13, 2004, to determine if that level of detail is sufficient for all future submittals of scheduling information to the NRC.

3. NEI will determine where the supporting data for deviation reports and similar reports should reside.

4. NRC will ask OGC whether the use of a dedicated server, for the receipt of proprietary information and with read-only capability, would be in violation of the requirements for dissemination of proprietary information.

5. Westinghouse will provide to the NRC PERT charts for each of the example schedules discussed at this meeting.

6. Westinghouse will provide to the NRC an example of a two-week rolling schedule.

7. Westinghouse will try to find a workstream that contains both electrical and instrumentation and control (I&C) components.

Project No. 0689

Attachments: 1. List of Attendees
2. Meeting Handouts

cc w/atts: See next page

ML:040980003 (PACKAGE)
ML:040960230 (Handout)
ADAMS Accession No.: ML040960298 Memo

OFFICE	DIPM/IIPB	DIPM/IIPB
NAME	EKleeh	MAshley
DATE	04/07/2004	04/07/2004

OFFICIAL RECORD COPY

Distribution for April 1, 2004, Meeting Notice

Hard Copy
IIPB R/F
JMSebrosky
MAshley

E-Mail
PUBLIC
PMNS
BBoger
CCarpenter
SRichards
DCoe
CCasto
RMcIntyre
TFoley
DThatcher
TMensah(NRR Communication Coord)
ACRS(RidsAcrsMailCenter)
MEI-Zeftway
MAshley
JBlake
RGardner
CPaulk
RWeisman
EKleeh

External E-Mail
bhupinder.singh@hq.doe.gov
tom.miller@hq.doe.gov
creid@bechtel.com
mbourge@entergy
winterjw@westinghouse.com
ricciutir@aecl.cu
rjb@nei.org
jlforet@edfina.com
jenny-weil@platts.com
james.beard@gene.ge.com
draleigh@scientech.com

Public Meeting Between NRC and NEI
on Construction Inspection Program Information Management System (CIPIMS)
April 1, 2004

Attendance Sheet

NRC

Mary Ann Ashley, NRR
Joe Sebrosky, NRR
Goutam Bagchi, NRR
William Usilton, OCIO
Thomas Foley, NRR
Anthony Cerne, Region I
Thomas Cheng, NRR
Conchita See, NRR
Jun Lee, NRR
Edmund Kleeh, NRR
Caudle Julian, Region II
Jerome Blake, Region II
Ronald Gardner, Region III

Others

Russ Bell, NEI
B. P. Singh, DOE
Jim Winters, Westinghouse
J. Alan Beard, GE Nuclear
Michael Bourgeois, Entergy
Rick Ricciuti, AECL
Jean-Luc Foret, EDF-INA
Cal Reid, Bechtel
Patricia Campbell, Winston & Strawn LLP
Deann Raleigh, LIS, Scientech
Jenny Weil, McGraw-Hill

Combination List:

cc: Mr. Charles Brinkman
Westinghouse Electric Co.
Washington Operations
12300 Twinbrook Pkwy., Suite 330
Rockville, MD 20852

Mr. David Lochbaum, Nuclear Safety Engineer
Union of Concerned Scientists
1707 H Street, NW, Suite 600
Washington, DC 20006-3919

Dr. Gail H. Marcus
U.S. Department of Energy
Office of Nuclear Energy, Science
& Technology
NE-1, Room 5A-143
1000 Independence Avenue, SW
Washington, DC 20585

Mr. Paul Gunter
Nuclear Information & Resource Service
1424 16th Street, NW, Suite 404
Washington, DC 20036

Mr. James Riccio
Greenpeace
702 H Street, NW, Suite 300
Washington, DC 20001

Mr. Ron Simard
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Mr. George Alan Zinke
Project Manager
Nuclear Business Development
Entergy Nuclear
M-ECH-683
1340 Echelon Parkway
Jackson, MS 39213

Mr. Thomas P. Miller
U.S. Department of Energy
NE-20, Rm. A286
Headquarters-Germantown
19901 Germantown Road
Germantown, MD 20874-1290

Ms. Marilyn Kray
Vice President, Special Projects
Exelon Generation
200 Exelon Way, KSA3-E
Kennett Square, PA 19348

Mr. Laurence Parme
Manager, GT-MHR Safety &
Licensing
General Atomics Company
P.O. Box 85608
San Diego, CA 92186-5608

Mr. Joseph D. Hegner
Lead Engineer - Licensing
Dominion Generation
Early Site Permitting Project
5000 Dominion Boulevard
Glen Allen, VA 23060

Mr. Edward L. Quinn
MDM Services Corporations
Utility Operations Division
28202 Cabot Road, Suite 205
Laguna Nigual, CA 92677

Ms. Lynn Connor
Doc-Search Associates
2211 sw 1ST Ave - #1502
Portland, OR 97201

Mr. Paul Leventhal
Nuclear Control Institute
1000 Connecticut Avenue, NW
Suite 410
Washington, DC 20036

Mr. James F. Mallay, Director
Regulatory Affairs
FRAMATOME, ANP
3315 Old Forest Road
Lynchburg, VA 24501

Ms. Patricia Campbell
Winston & Strawn
1400 L St., NW
Washington, DC 200

Mr. W. Edward Cummins
AP600 and AP1000 Projects
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

Dr. Robert E. Gamble
Engineering Manager, ESBWR
GE Nuclear Energy
175 Curtner Avenue, MC 365
San Jose, CA 95125

Mr. Jack W. Roe
SCIENTECH, INC.
910 Clopper Road
Gaithersburg, MD 20878

Mr. Stephen P. Frantz
Morgan, Lewis, & Bockius, LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Mr. Gary Wright, Manager
Office of Nuclear Facility Safety
Illinois Department of Nuclear Safety
1035 Outer Park Drive
Springfield, IL 62704

Mr. David Ritter
Research Associate on Nuclear Energy
Public Citizens Critical Mass Energy
and Environmental Program
215 Pennsylvania Avenue, SE
Washington, DC 20003

Mr. Tom Clements
6703 Gude Avenue
Takoma Park, MD 20912

Mr. Lionel Batty
Nuclear Business Team
Graftech
12300 Snow Road
Parma, Ohio 44130

Mr. James Blyth
Canadian Nuclear Safety
Commission
280 Slater Street, Station B
P.O. Box 1046
Ottawa, Ontario
K1P 5S9

Dr. Atambir S. Rao
Project Manager, ESBWR
GE Nuclear Energy
175 Curtner Avenue, MC 365
San Jose, CA 95125 USA

Mr. Edward F. Sproat, III
Vice President - Int'l Projects
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

Mr. Vince Langman
Licensing Manager
Atomic Energy of Canada Limited
2251 Speakman Drive
Mississauga, Ontario
Canada L5K 1B2

Dr. Regis A. Matzie
Senior Vice President and
Chief Technology Officer
Westinghouse Electric Company
2000 Day Hill Road
Windsor, CT 06095-0500

Mr. Ed Wallace, General Manager
Projects
PBMR Pty LTD
PO Box 9396
Centurion 0046
Republic of South Africa

Mr. Dobie McArthur
Director, Washington Operations
General Atomics
1899 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006

Mr. Russell Bell
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708