

NRC INSPECTION MANUAL

MCB

INSPECTION PROCEDURE 73054

PART 52, PRESERVICE AND INSERVICE INSPECTION - REVIEW OF PROGRAM

PROGRAM APPLICABILITY: 2504

73054-01 INSPECTION OBJECTIVE

- | 01.01 To **verify** whether the licensee's program pertaining to the Preservice Inspection (PSI) and Inservice Inspection (ISI) is in conformance with regulatory requirements of Title 10 of the *Code of Federal Regulations* Section 50.55a and the licensee's commitments and is ready to support the operation of the facility.
- | 01.02 To **verify** that the PSI and ISI Programs include: the proper scope of components, inspection requirements, and have been approved.
- | 01.03 To **verify** that the Quality Assurance Program will support execution of the PSI/ISI programs.
- | 01.04 To **verify** that the Repair/Replacement Program is established to allow repairs and replacements to be made in accordance with 10 CFR 50.55a and American Society of Mechanical Engineering (ASME) Boiler and Pressure Vessel Code requirements.
- | 01.05 To **verify** that records maintenance and retention will support execution of the PSI/ISI program.
- | 01.06 To **verify** that proper training requirements for personnel are established.
- | 01.07 To **verify** that reporting requirements and methods have been established.
- | 01.08 To **verify** that the PSI/ISI program includes methods for requesting relief from or alternatives to the requirements.

73054-02 INSPECTION REQUIREMENTS AND GUIDANCE

General Guidance: This review of the licensee's program includes the PSI program of each unit prior to initial startup and the planned ISI program of each unit for the first 10-year interval. The inspection percentages should be increased, as outlined in the following sections, if inspection results reveal issues in certain areas of program development.

The preservice inspection program consists of non-destructive examinations which are performed upon completion of the construction code requirements and completed prior to initial

plant startup. These examinations serve as the baseline for which future ISI examination results can be compared. Preservice examination requirements are defined in the ASME Code, Section III and Section XI and may include Radiographic (RT), Ultrasonic (UT), Liquid Penetrant (PT), Magnetic Particle (MT) and Eddy Current (ECT) non-destructive examination methods, and Visual Examination (VT).

This procedure covers all ASME Code, Section XI ISI activities with the exception of those items in the PSI program that are covered in the Preoperational Test Program, which is detailed by other Inspection Procedures (IP) indexed in Appendix B of IMC 2504. Some licensees may have implemented a **risk-informed** ISI program. Currently, implementation of a **risk-informed** ISI program requires NRC authorization in accordance with 10 CFR 50.55a(a)(3) as an alternative to the ISI requirements of Section XI of the ASME Code. If the licensee has implemented a **risk-informed** ISI program, obtain the submittal and the NRC's safety evaluation before reviewing the program. Alternatively, support may be obtained from the Office of New Reactors in conducting the **risk-informed** ISI inspection. The **risk-informed** approach is not applicable to the PSI requirements.

For the purpose of this inspection procedure, the term, "PSI/ISI program," includes the PSI/ISI plan, the repair/replacement program, and the administrative, technical, and quality assurance program and procedures required to implement the plan. Verification of the conformance of the PSI and ISI programs using this IP may be performed together or separately. This will depend on the licensee's implementation schedule and the Region's plan and schedule for the IMC 2504 inspections. If the PSI and ISI program inspections are performed separately using this IP, then the ISI program inspection should only focus on verifying the aspects of the ISI program that are different than the PSI program. Specifically, the ISI program inspection, at a minimum, should include the following procedure steps:

1. Verify that the appropriate percentages of components were selected for ISI (Sections 02.03.b.2, 02.03.c.2)
2. Verify that any proposed ASME Code Cases and alternatives have been approved by the NRC (Section 02.01.c-e)
3. Verify that the ISI program for steam generator tubing is in accordance with the Technical Specifications and Nuclear Energy Institute guidelines (Section 02.03.i)
4. Verify that augmented inspections described in the Final Safety Analysis Report or other licensee commitments have been included in the ISI program (Section 02.03.h)
5. Verify that repair/replacement activities meet the appropriate requirements (Section 02.05)
6. Verify that the ISI program has been filed with the NRC (Section 02.08)

Pursuant to 10 CFR 50.55a, each construction permit, issued under 10 CFR Part 50, is subject to all the conditions in §50.55a in addition to those specified in §50.55. All the provisions of §50.55a that are applicable to holders of construction permits for nuclear power reactors also apply to holders of combined licenses issued under 10 CFR Part 52, except that combined

license holders are not subject to the conditions of paragraphs (f) and (g) of §50.55a until after the Commission makes the finding under §52.103(g).

10 CFR 50.55a(g)(3)(i) and 10 CFR 50.55a(g)(3)(ii) both require that components are designed to provide access for ISI and that components meet the PSI requirements set forth in the ASME Code editions and addenda applied to their construction. 10 CFR 50.55a(g)(3)(i) applies to ASME Code Class 1 components (including supports), and 10 CFR 50.55a(g)(3)(ii) applies to ASME Code Class 2 and 3 components (including supports for components that are classified as ASME Code Class 1, 2 and 3).

10 CFR 50.55a(g)(3)(v), states, "All components (including supports) may meet the requirements set forth in subsequent editions of codes and addenda or portions thereof which are incorporated by reference in paragraph (b) of this section {10 CFR 50.55a}, subject to the conditions therein." This provision allows the holder of a construction permit or combined license to use later editions and addenda of the code that are incorporated by reference in paragraph (b) of § 50.55a, for preservice inspection only, without the need for NRC approval or authorization.

02.01 Program Approval. Verify that the following requirements are met:

Guidance: This procedure step should be performed prior to performing any other sections of the IP.

- a. Verify that the PSI and ISI plans have been reviewed and approved by the licensee's site nuclear safety review committee, or equivalent, and the review and approval has been documented.
- b. Verify that the services of an Authorized Nuclear Inservice Inspector (ANII) have been procured and the PSI and ISI plans have been reviewed by the ANII in accordance with Article IWA-2120 of Section XI the ASME Code.
- c. Verify that any ASME Code Cases proposed for use as part of the PSI or ISI plans are approved by the NRC, per 10 CFR 50.55a and detailed in Regulatory Guide 1.147, or have been approved by NRC for use as an alternative to the ASME Code.
- d. Verify that alternatives to the ASME Code requirements, if any, identified in the PSI/ISI program have been authorized by NRC prior to use pursuant to 10 CFR 50.55a(a)(3).

02.02 Program Organization. Verify the following items are included in the PSI/ISI program **or in site procedures:**

- a. Identification of all licensee commitments and regulatory requirements pertinent to PSI/ISI testing and monitoring.

Guidance: The inspector should contact the licensing project manager for the site to determine the status of any relief requests involving PSI/ISI activities. The inspector should develop a list of requirements and commitments, and determine if the licensee's program provides a means of tracking requirements and commitments.

If a **risk-informed** ISI program has been adopted, the inspector should obtain the licensee submittal that requested use of this alternative method and the safety evaluation report issued by the NRC. Compare this material to the ISI program to ensure the requirements are met.

- b. Preservice examination requirements for containment are included in the PSI/ISI program plan and meet the requirements of ASME Code, Section XI, IWE-2200 and IWL-2200.
- c. Means of preparing plans and schedules and filing them with enforcement and regulatory authorities having jurisdiction at the facility.
- d. Site administrative procedures to define the authority and responsibilities of the persons or organizations involved with the final evaluation and acceptance of PSI/ISI results for the licensee.
- e. Process for demonstrating alternative nondestructive examination methods to the ANII in accordance with the ASME Code, Section XI.
- f. The ASME Code edition and addenda to be used for PSI/ISI is identified.

02.03 Program Scope. Verify the PSI/ISI program, including examinations and tests, is in conformance with relevant ASME Code, Section XI editions and addenda, and ASME Code cases proposed for use as part of the plan, as follows:

Guidance: Pursuant to 10 CFR 50.55a(g) and ASME Code, Section XI, IWA-2420, and Section XI, IWA-6000, the licensee develops PSI and ISI plans and schedules. Exceptions to or deviations from testing requirements shall be in accordance with those permitted by the PSI/ISI program as approved by the NRC.

It may be necessary to obtain support from NRO to support this phase of inspections. Contact NRO as needed to obtain the necessary support.

- a. Obtain a listing of all ASME Code, Section XI Class 1, 2 and 3 components and welds in the PSI/ISI database.

Guidance: The inspector should verify that the PSI/ISI database is controlled as part of the Quality Assurance program. If the licensee does not use a PSI/ISI database, then the IP steps that refer to the “database” should be performed using whatever document the licensee uses to list the components that are part of the PSI/ISI program.

- b. Obtain drawings of Class 1 systems, including all applicable components. Components (**vessels, pumps, valves, piping, etc.**) include all related items, **such as** welds, bolted connections, and integral attachments **that are** subject to examination in accordance with ASME Section XI, **IWB-2500**. **Using these drawings, perform the following procedure steps:**

Guidance: The review sample should include each of the Examination Categories in ASME Code, Section XI, Article IWB. Review can be terminated once 15% of the total components on the listing have been verified, and no Class 1 components were inappropriately omitted from the PSI/ISI database. If components were inappropriately omitted from the database, continue the review with an additional 15% of the database. If no additional components were inappropriately omitted from the database then the inspector may conclude the review. However, If additional components are identified that were inappropriately omitted from the PSI/ISI database, the inspector should terminate this portion of the inspection, notify the licensee, and schedule a follow-up after the licensee corrects the deficiencies and reviews the database.

1. Use table IWB-2500 of the ASME Code, Section XI to verify all Class 1 components, **subject to the guidance above**, and ensure they are listed within the PSI/ISI database.
2. **For each component selected**, verify that the appropriate percentages of **associated items** were selected for PSI/ISI examination as required by ASME Code, Section XI IWB-2200 and the tables of IWB-2500, or the optional ASME Code Cases approved for use at the site, or the applicable **risk-informed** ISI requirements, excluding those exempted by IWB-1220.

GUIDANCE: For piping, it may be necessary to look at the entire piping system in order to verify that the appropriate percentages have been selected in accordance with the ASME Code.

3. Verify that the proper PSI/ISI examination for Class 1 components is identified in the database.
4. Identify any Class 1 weld/component not included in the database.

- c. Obtain drawings showing the bolted connections, **welds**, and **welded attachments** for three Class 2 piping systems, including vessels. **When selecting the sample, the inspectors should consider the size of the system as well as its risk significance. Using these drawings, perform the following procedure steps:**

Guidance: If the licensee does not use a PSI/ISI database, then the IP steps that refer to the “database” should be performed using whatever document the licensee uses to list the components that are part of the PSI/ISI program.

1. Use table IWC-2500 of the ASME Code, Section XI to verify all Class 2 components and ensure they are listed within the PSI/ISI database. If a **risk-informed** ISI has been approved verify the Class 2 components are listed within the ISI database.
2. Verify that the appropriate percentages of **associated items** were selected for PSI/ISI examination as required by the tables of ASME Code, Section XI, IWC-2500, or the appropriate **risk-informed** ISI requirements.

3. Verify that the proper PSI/ISI examination for Class 2 components is identified in the database.
 4. If components were inappropriately omitted from the database, review the drawings for an additional three piping systems as outlined above. If no other components were inappropriately omitted, terminate the review.
 5. If additional components are identified that were inappropriately omitted, terminate the review and notify the licensee and reschedule another review after the licensee corrects and reviews the database.
- d. For one Class 1 and **one Class 2** system, conduct a detailed review of the drawings and walk down the system, ensure that all welds are depicted, and evaluate a selection of the components chosen by the licensee for inspection to ascertain accessibility and clearances for future in-service inspections. Determine if construction modifications have added welds, if so, have these welds been added to the PSI/ISI scope.
- e. Obtain drawings for **a minimum of** ten ASME Code Class 3 components (preferably different types of components), showing the welded attachments. **Using these drawings, perform the following procedure steps:**
- Guidance:** If the licensee does not use a PSI/ISI database, then the IP steps that refer to the “database” should be performed using whatever document the licensee uses to list the components that are part of the PSI/ISI program.
1. **If the components are present on site, then** conduct a detailed review of the drawings and verify the accuracy of the welded attachment details for five of these components.
 2. Identify all the attachment welds that are part of the ASME Code, Section XI PSI/ISI scope as identified in the tables of ASM, Section XI, IWD-2500 and ensure they are listed within the ISI database.
 3. Verify that the appropriate number of attachment welds was selected for PSI/ISI examination as required by ASME Code, Section XI, IWD-2200 and are identified in the table of IWD-2500.
 4. Verify that the proper PSI/ISI examination for Class 3 components is identified in the database.
- f. Obtain a listing of all ASME Class 1, 2, and 3 piping and component supports in the PSI/ISI database. Obtain, at a minimum, 30 piping isometric drawings from ASME Class 1, 2, and 3 systems that show pipe support designation and location. **Using these drawings and the PSI/ISI database, perform the following procedure steps:**

Guidance: If the licensee does not use a PSI/ISI database, then the IP steps that refer to the “database” should be performed using whatever document the licensee uses to list the components that are part of the PSI/ISI program.

1. Verify that all piping/component supports on these drawings are contained within the PSI/ISI database.
2. Verify that the proper inspections are specified for piping/component supports in the PSI/ISI database in accordance with ASME Code, Section XI, IWF-2500.
3. During the construction phase, the inspector should field verify (walk down) 10 of the piping isometric drawings and checking the accuracy of the pipe support information.

g. On a sampling basis, verify that the proper inspections are specified for the containment in the PSI/ISI database (or other controlled document) in accordance with ASME Code, Section XI, IWE/IWL-2500.

h. Verify that the augmented inspections described in the FSAR or other licensee commitments have been included in the PSI/ISI program or some other program document.

Guidance: At the time of the inspection, the augmented inspections identified below may not be an all-inclusive list. Therefore, the inspector should review the FSAR to verify that the ISI program has been augmented as described.

- i. All licensees: The ISI program of all plants shall be augmented to include a 100% volumetric examination of all pipe welds in high-energy piping in containment penetration areas (i.e., the break exclusion region/zone) during each inspection interval as defined in ASME Code, Section XI, IWA-2400. The break exclusion region/zone and affected piping subject to this augmented inservice examination is defined in FSAR Section 3.6.2.
- ii. Pressurized Water Reactors: The ISI program for all pressurized water reactors shall be augmented with the inspections required by the following ASME Code Cases:
 - a. ASME Code Case N-729-1, entitled “Alternative Examination Requirements for PWR Reactor Vessel Upper Heads With Nozzles Having Pressure-Retaining Partial-Penetration Welds Section XI, Division 1,” and subject to the conditions of 10 CFR 50.55a (g)(6)(ii)(D)(2) through (6).
 - b. ASME Code Case N-722-1, entitled “Additional Examinations for PWR Pressure Retaining Welds in Class 1 Components Fabricated With Alloy 600/82/182 Materials,” and subject to the conditions of 10 CFR 50.55a (g)(6)(ii)(E)(2) through (4). The inspection requirements of N-722-1 do not apply to components with pressure retaining welds fabricated with Alloy 600/82/182 materials that have been mitigated by weld overlay or stress improvement.

- iii. ABWR plants: The ISI program for licensees that reference the Advanced Boiling Water Reactor design certification **shall** be augmented to include the inservice inspection of feedwater nozzles to address the issues identified in NUREG-0619 "BWR Feedwater Nozzle and Control Rod Drive Return Line Nozzle Cracking." The ISI program should include the inspections described in FSAR Section 19B.2.6, "A-10 BWR Feedwater Nozzle Cracking."
- iv. AP1000 plants: The ISI program for licensees that reference the AP1000 design certification **shall** be augmented to include the performance of a 100% volumetric examination of the weld build-up on the reactor vessel head for the instrumentation nozzle penetrations (Quickloc) conducted once each inspection interval (**reference: FSAR Section 5.2.4.1**).
- i. Verify that the PSI/ISI program for SG tubing complies with the Technical Specifications and is in accordance with the NEI 97-06 "Steam Generator Program Guidelines." NEI 97-06 references the Electric Power Research Institute (EPRI) Pressurized Water Reactor Steam Generator Examination Guidelines and other guidelines that make up the EPRI Steam Generator Management Program.

Guidance: Using the plant Technical Specifications and EPRI guidance the inspectors should verify the following:

- i. PSI of SG tubes and tube plugs is in accordance with Section 3.2 of the EPRI PWR Steam Generator Examination Guidelines report.
- ii. Planned ISI of SG tubes, tube sleeves, and tube plugs, and other tube repairs complies with the Technical Specifications and is in accordance with Sections 3.4 and 3.5 of the EPRI PWR Steam Generator Examination Guidelines report.
- iii. The licensee has documented the basis for any deviations from the EPRI guidelines.
- iv. If the licensee's program refers to the use of tube repair methods (e.g., sleeves) or alternate plugging/repair criteria, **verify that** the NRC staff has approved a corresponding license amendment.

02.04 Quality Assurance Program. Verify the following items are included in the licensee's and PSI/ISI contractor's quality assurance programs:

- a. Procedures for the maintenance of required PSI/ISI records.
- b. QA review includes assurance that plans and procedures have been reviewed and meet regulatory requirements.
- c. Procedures are established for the corrective action of conditions adverse to quality as detected during examination, including provisions to preclude repetition of such adverse conditions.

- d. Audits or surveillance of PSI/ISI activities are conducted by qualified QA personnel to verify compliance with the PSI/ISI program.
- e. Procedures are established to effectively oversee contractor activities concerned with PSI/ISI.

Guidance: PSI and ISI activities are subject to QA audit, monitor, surveillance, and Quality Control inspection. The licensee's QA Manual and (if applicable) contractor's QA Manual should cover all PSI and ISI activities.

The QA program must be documented in accordance with 10 CFR Part 50, Appendix B, or ASME NQA-1, [Edition as permitted in 10 CFR 50.55a(b)(2)(x)] "Quality Assurance Program Requirements for Nuclear Facility Applications." Note that in RG 1.28, "Quality Assurance Program Criteria (Design and Construction)," the staff currently endorses the Part I and Part II requirements of ASME NQA-1-2008 and the NQA-1a-2009 Addenda for the implementation of a QA program during design and construction phases of nuclear power plants and fuel processing plants.

- f. Verify that measures are in place to ensure that changes to the design are translated into the PSI/ISI program.

Guidance: PSI/ISI programs are developed and updated using a plant design that has been "frozen" to a certain date. As design changes and construction modifications occur, the licensee must have design control measures (per 10 CFR Part 50, Appendix B) in place to ensure that these changes are included in the design documents used to update the PSI/ISI program. These measures will ensure that ASME Code, Section XI requirements are met even as the design changes over time.

02.05 Code Repair/Replacement Program Review. Verify that the Repair/Replacement Program meets the requirements of the ASME Code, Section XI.

- a. Verify that the Repair/Replacement (R/R) Program is in accordance with the requirements of ASME Code, Section XI, IWA-4000 and 10 CFR 50.55a.

Guidance: The inspector performing this IP step should be familiar with the edition and addenda of Section XI being used for the R/R program. The inspector should also be cognizant of the requirements related to Repair/Replacement plans, acceptability/suitability reviews, Inspection (Authorized Inspection Agency), the application of Section XI Code Cases, and reconciliation.

- b. If repair/replacement activities have occurred at the time of inspection, then verify the following:
 - i. Verify, by sampling, that repairs were performed to ASME Code Section III requirements.

Guidance: Prior to the Commission making its finding under 10 CFR 52.103(g), repairs to ASME Code components shall be made to the Construction Code (Section III). ASME Code, Section XI rules for R/R may be used prior to the 52.103(g) finding, provided they do not conflict with Section III requirements. If they do conflict, then the inspector should verify that licensee has submitted its proposed use of Section XI rules to the NRC for authorization as an alternative to the regulations pursuant to 10 CFR 50.55a(a)(3). Per 10 CFR 50.55a(a)(3), the alternative must be approved prior to its use.

- ii. Verify, by sampling, that the licensee has evaluated all repair and replacement actions in accordance with 10 CFR 50.59 to ensure that a license amendment is not required.

02.06 Records. Verify that provisions for the maintenance and retention of records, including inspection, examination, test reports, repair and replacement, QA, and NDE records have been established in the PSI/ISI program.

Guidance: As required by ASME Code, Section III or XI, the licensee prepares records of inservice inspection. The standard FSAR specifies record retention periods, and ASME NQA-1-2008 and the NQA-1a-2009 Addenda, and RG 1.28 provide guidance on retention periods and design features for a permanent record storage facility. It is not necessary that all PSI and ISI records be stored onsite. Special concern should be given to the acquisition and proper storage of PSI records for the PSI performed by the component manufacturer.

02.07 Qualification of Personnel. Verify the program specifies personnel qualification requirements consistent with the ASME Code, and other applicable documents.

Guidance: The inspector should review the licensee's written practice and ensure that qualified personnel are being used for examinations. As required by ASME Code, Section XI, personnel performing nondestructive examinations shall be qualified and certified using a written practice in accordance with ANSI/ASNT CP-189, as amended by the requirements of IWA-2300. Other certifications (i.e. SNT-TC-1a, ANS45.2.6, etc.) are valid until recertification is required. ASME NQA-1-2008 and the NQA-1a-2009 Addenda, Part I, provides guidance to ensure that commitments to qualifications of organizational staff are met.

The inspector should also be aware of NRC/industry initiatives in the area of qualification of procedures and personnel for ISI, such as the EPRI Performance Demonstration Initiative for the qualification of procedures and personnel for ultrasonic testing.

02.08 Reporting Requirements. Verify that the licensee's program includes the ASME Code and plant Technical Specification requirements, as applicable, for submittal of written reports of PSI/ISI results and repairs/replacements.

Guidance: Intent of the review is to ensure the licensee's program has provisions for submitting the required reports as outlined in the ASME Code or any other applicable document such as a Technical Requirements Manual or site director procedures manual.

For reviews during construction, just prior to commercial service, the inspector should review the PSI summary report and initial ISI program, if available and ensure they have been filed with the NRC for review, or that the program has proper instruction to send the PSI summary report and ISI program to the NRC.

- | 02.09 Relief Requests. Verify that the licensee's program contains guidance regarding the identification and processing of requests for relief from ASME Code requirements that are impractical pursuant to 10 CFR 50.55a(g)(5)(iii).

73054-03 RESOURCE ESTIMATE

| Total resource estimate is between 376 and 476 hours, depending on what is identified during the inspection. The inspection hours are broken out by sections as identified below.

| 03.01 Review of Program Approval. In accordance with section 02.01, is included in the estimate for the review of section 02.03

| 03.02 Review of the Program Organization. In accordance with section 02.02, which involves a review of programmatic procedures, should take 40 hours.

| 03.03 Review of the Program Scope. In accordance with section 02.03, which includes review of drawings, databases, and walk downs, should take on the order of 300-400 hours, depending on issues that arise.

| 03.04 Review of the Quality Assurance Program. In accordance with section 02.04 should take on the order of 10 hours.

| 03.05 Review of the Repair/Replacement Program. In accordance with section 02.05 should take on the order of 10 hours.

| 03.06 Review of Records. In accordance with section 02.06 is included within the estimate for the review of section 02.02.

| 03.07 Review of Qualification of Personnel. In accordance with section 02.07 should take on the order of 16 hours.

| 03.08 Review of Reporting Requirements. In accordance with section 02.08 is included within the estimate for the review of section 02.02.

| 03.09 Review of Relief Requests. In accordance with section 02.09 is included in the estimate for the review of section 02.02.

Guidance: If this IP is used to inspect the PSI program and planned ISI program separately, then the resource estimates provided are only valid for the inspection of the PSI program. Given that the PSI and ISI program requirements are identical for several inspection areas, the inspectors may take credit for performing portions of the IP once to cover both programs. This will result in a decrease in the resources needed to perform the ISI program inspection.

73054-04 REFERENCES

ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components"

ANSI/ASNT CP-189 "ASNT Standard for Qualification and Certification of Nondestructive Personnel"

ASME NQA-1-2008, "Quality Assurance Program Requirements for Nuclear Facility Applications"

ASME NQA-1a-2009 Addenda to ASME NQA-a-2008, "Quality Assurance Program Requirements for Nuclear Facility Applications"

Regulatory Guide 1.28, "Quality Assurance Program Criteria (Design and Construction)"

Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1"

10 CFR 50.55a, "Codes and Standards"

10 CFR 52.99, "Inspection During Construction"

73054-05 PROCEDURE COMPLETION

This procedure is complete upon satisfactory inspection results verifying that the licensee's program pertaining to PSI and ISI is complete, in compliance with the regulatory requirements, and consistent with the FSAR and all applicable licensee commitments and license conditions.

END

Attachment 1: Revision History for IP 73054

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	07/01/08 CN 08-019	Initial issue to support inspections of operational programs described in IMC 2504, Non-ITAAC Inspections. Completed 4 year search of historical CNs and found no commitments.	N/A	ML070920379
N/A	ML13231A038 09/25/13 CN 13-023	Revised to update ASME and other references and to make editorial changes.	N/A	ML13231A039
N/A	ML14302A552 12/22/2014 CN 14-031	Periodic update based on in-depth discussions between HQ staff and Region II inspectors to address usability issues. Includes guidance on inspecting the planned ISI program separate from the PSI program; a new section on PSI/ISI program approval; guidance on the sample size of Class 1 components; additional procedure steps for inspection of the PSI/ISI program for SG tubing; a procedure step and guidance for verifying augmented inspections are included in the PSI/ISI program; separate procedure step to verify that procedural controls are in place to prevent omissions from the PSI/ISI program; revised procedure step and guidance regarding Code Repair/Replacement program review; revised procedure step and guidance regarding relief requests per 10 CFR 50.55a(g)(5)(iii).	N/A	ML14302A553