

## QUESTIONS AROUND THE TOPICS

### Group 1. Commissioning management

#### 1.A. Application of commissioning experience and operating experience

- Do you use commissioning experience from other reactors and/or operating experience to enhance the oversight of the commissioning phase for a new reactor? If so, describe the experience and how the oversight of commissioning has been enhanced.
- When multiple units share the same licensing documents, do issues raised during the commissioning period of the first unit have any impact on the licensing documents of the subsequent units?

#### 1.B. Selection of tests and acceptance of tests results

- How do you check that the commissioning tests proposed by the licensee are adequate?
- What is your position on crediting factory or qualification tests without performing new as-installed tests during commissioning? How do you deal with unsatisfied factory test results not solved before expedition on site?
- Do you allow a new reactor to take credit for first plant only tests (FPOT) performed at other units of the same or similar reactor design?
  - If so, which tests can be omitted and why? If not, describe your organisation's position on FPOT.
  - Are you aware of the draft MDEP EPRWG Common Position addressing FPOT? Please, feel free to provide any comment.
  - How do you manage conflicts in the process of decision making that may occur about whether a certain test can be omitted or not?
  - What is your procedure for crediting the results of FPOT that has been performed under another regulatory supervision?
- What are requirements set for tests that have never been performed before (i.e. First-Of-A-Kind – FOAK)? How do you check the results of tests and their representativeness? Does the supervision of these tests differ from other tests? What are the requirements for passive safety systems testing during commissioning? How do you check the adequacy of analysis and experiment to support the passive safety systems capability?

#### 1.C. Configuration management reflecting design change

- How do you check design change has been reflected in the licencing documents (i.e. preliminary safety analysis report (PSAR) vs. final safety analysis report (FSAR), test procedures, operating procedures, etc.)?
- How do you check tests are still valid when design changes are implemented during construction?
- When and for which document do you require regulatory approval?

### Group 2. Commissioning oversight

#### 2.A. Regulatory hold points and witness points

- Do you impose mandatory hold points or witness points during commissioning?
  - If so, what is the basis for selecting the hold points and witness points?
  - If not, what is the basis for not imposing mandatory hold and witness points?
- Do you set criteria for the acceptance of hold points or witness points (i.e. prescriptive regulatory requirement)? If so, to what extent do you involve the licensee before you impose the criteria for the acceptance of hold points or witness points?

## **2.B. Bases for inspection**

- What are the regulatory bases for inspection (PSAR, FSAR, others)?
- Is there any specific requirement regarding multi-units sites commissioning?

## **2.C. Tests sampling criteria**

- What are your criteria to sample licensee's tests to be inspected?
- What is the basis to establish above criteria?
- How do you classify the tested systems?

## **2.D. Dealing with unexpected test results or occurrences**

- How do you check that licensee's processes are adequately established to deal with the situation of unexpected test results or occurrences?
- How do you determine that licensee's implementation and follow-up corrective action are adequate in the case of the unexpected tests results or occurrences?

## **Group 3. Organisational issues**

### **3.A. Inspection for licensee organisational readiness**

- How do you verify the organisational readiness of the licensee and its contractor organisations to commence commissioning? This may include areas such as competence, resources, management and supervision, decision-making etc.
- How do you confirm that interfaces between the licensee and other key organisations (manufacturer, vendor/designer, major contractors, etc.) are clear, robust and effective?

### **3.B. Oversight of safety culture during commissioning stage**

- How do you confirm that the safety culture of the licensee and its contractors is appropriate to commence and conduct commissioning?
- How do you check that events and near misses are reported openly by the licensee and its contractors, and that learning is acted upon?

### **3.C. Oversight of maintenance and preservation of equipment**

- How do you ensure the commissioning activities do not adversely impact the facility (e.g. settings)?
- How do you ensure that the licensee, equipment installer and equipment supplier are aware of, and account for, environmental and other conditions that newly installed equipment may be exposed to prior to commissioning and operations (e.g. potential for heat, condensation, dust, impact, etc.)? How do you ensure that responsibilities for maintaining installed equipment prior to commissioning are clearly defined? When does the clock start for maintenance and periodic testing?

### **3.D. Deployment of regulatory resource**

- How do you determine, prioritise and manage regulatory resource needs to oversee commissioning?
- How do you ensure that regulatory oversight keeps pace with commissioning and does not unnecessarily impact on the licensee's schedule?