



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

ITAAC Closure Guidance Development Workshop 4

Jim Gaslevic, P.E.

Reactor Operations Engineer

Construction Inspection Program DCIP/NRO

December 18, 2007



Workshop Objectives

- Discuss resubmitted ITAAC closure letter for Seismic Category 1 Buildings
- Review D-RAP ITAAC closure letter
- Introduce uncomplete ITAAC notification letter examples
- Discuss ITAAC post-closure control



Workshop Series Accomplishments

- Successfully worked through seven ITAAC closure letter examples and closure letter template
- Agreed upon a preliminary Table of Contents for industry guide
- Expectation for “sufficient information” and definition of “reasonable person”
- Understanding that the closure letter must demonstrate that the acceptance criteria have been met, and that the uncomplete notification must provide an element of assurance for a predictive finding
- A majority of the draft industry guide will be completed and submitted by end of March 2008.



AP1000 ITAAC 3.7-3, #1

Design-Reliability Assurance Program provides reasonable assurance that 66 risk-significant components are designed to operate as required.

Design Commitment

The D-RAP provides reasonable assurance that the design of risk-significant SSCs is consistent with their risk analysis assumptions.

Inspections, Tests, and Analyses

Inspections will be performed for the existence of a report which establishes the estimated reliability of as-built risk-significant SSCs.

Acceptance Criteria

A report exists and concludes that the estimated reliability of each as-built component identified in Table 3.7-1 is at least equal to the assumed reliability and that industry experience including operations, maintenance, and monitoring activities were assessed in estimating the reliability of these SSCs.



ITAAC Post-Closure Control

- Post-Closure refers to the time between ITAAC closure and 52.103(g) finding
- Management of systems, structures, or components (SSC) that need maintenance, repair, or replacement
- Licensee programs could include provisions tailored to ensure that acceptance criteria remain met



ITAAC Post-Closure Control (cont'd)

- As a special topic or appendix, the industry guide could discuss these added elements to licensee's programs (e.g., QA Program, Corrective Action Program, and Maintenance Program) in the pre-operational phase
- Develop NRC guidance on how to implement 52.103(g) process



ITAAC Post-Closure Control (cont'd)

- Maintenance or replacement might be needed to ensure continued SSC conformance with the acceptance criteria
 - Replacement with an identical SSC may only require post-maintenance testing, and not ITAAC re-validation, to confirm that acceptance criteria are still met
 - Replacement with a different SSC could invalidate the ITAAC, requiring an additional closure letter submittal



Conclusions and Recommendations

- Workshop Summary
- Public Meeting Schedule:
January 31, 2008
Early March 2008
- NRC would appreciate detailed feedback on the workshop format – forms available in the back of the room

Jim Gaslevic, NRO/DCIP

jeg1@nrc.gov

301-415-2776