

Sample 225-Day ITAAC Letter

XX/YY/ZZZZ (Date) (225 days before scheduled fuel load)

To: NRC

From: {Name of Licensee}
{Site Name and Unit #(s)}
{Docket #(s)}

Subject: 225-Day Notification for AP1000 ITAAC Item 2.5.2-8, #10

Pursuant to 10 CFR 52.99(c)(2), {Licensee} is notifying the NRC that {Site Name and Unit #(s)} Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.5.2-8, #10 for the Protection and Safety Monitoring System (PMS) will not be completed 225 days prior to initial fuel load currently scheduled for {month, day, year}. However, ITAAC 2.5.2-8, #10 will be completed prior to operation. This notification is based on the guidance described in NEI-08-XX (Reference 1).

ITAAC Statement

Design Commitment

Setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

Inspection/Test/Analysis

Inspection will be performed for a document that describes the methodology and input parameters used to determine the PMS setpoints.

Acceptance Criteria

A report exists and concludes that the PMS setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

Actions for ITAAC Closure

Instrument setpoints for permanently installed instrumentation are determined using methodology specified in Procedure XXX, *Instrument Uncertainty and Setpoint Calculation Guidelines* (Reference 2). This methodology accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation. Procedure XXX is used at {Licensee's operating units} giving additional validity and assurance to the methodology.

The setpoints for PMS have been determined using Procedure XXX and documented in Engineering Report YYY, *Setpoint Determination for the Protection and Safety Monitoring System* (Reference 3).

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In order to close ITAAC 2.5.2-8, #10, {Licensee} will complete an inspection of Engineering Report YYY. The purpose of the inspection is to confirm that the PMS setpoints are determined using Procedure XXX and that the procedure specifies a methodology that takes into account instrument loop uncertainties and inaccuracies, response testing results, and maintenance or replacement activities. To date, {Licensee} has completed approximately XX% of the inspection. This inspection will be documented in an ITAAC closure inspection report, which will be available for NRC review.

ITAAC Closure Schedule

{Licensee} is tracking ITAAC 2.5.2-8, #10 in its ITAAC database and is scheduled to perform the inspection of Engineering Report YYY on or about {month, day, year}. {Licensee} expects satisfactory results since, as mentioned above, Procedure XXX is successfully used at {Licensee's operating units}.

If the NRC has any questions regarding this ITAAC item, please contact {name of contact person for Licensee} at {telephone # for contact person}.

Sincerely,

{Signature of Licensee Representative}
{Typed Name of Licensee Representative}
{Title of Licensee Representative}

References

1. NEI 08-XX, *ITAAC Close-Out Process Guidelines*
2. Procedure XXX, *Instrument Uncertainty and Setpoint Calculation Guidelines*
3. Engineering Report YYY, *Setpoint Determination for the Protection and Safety Monitoring System*