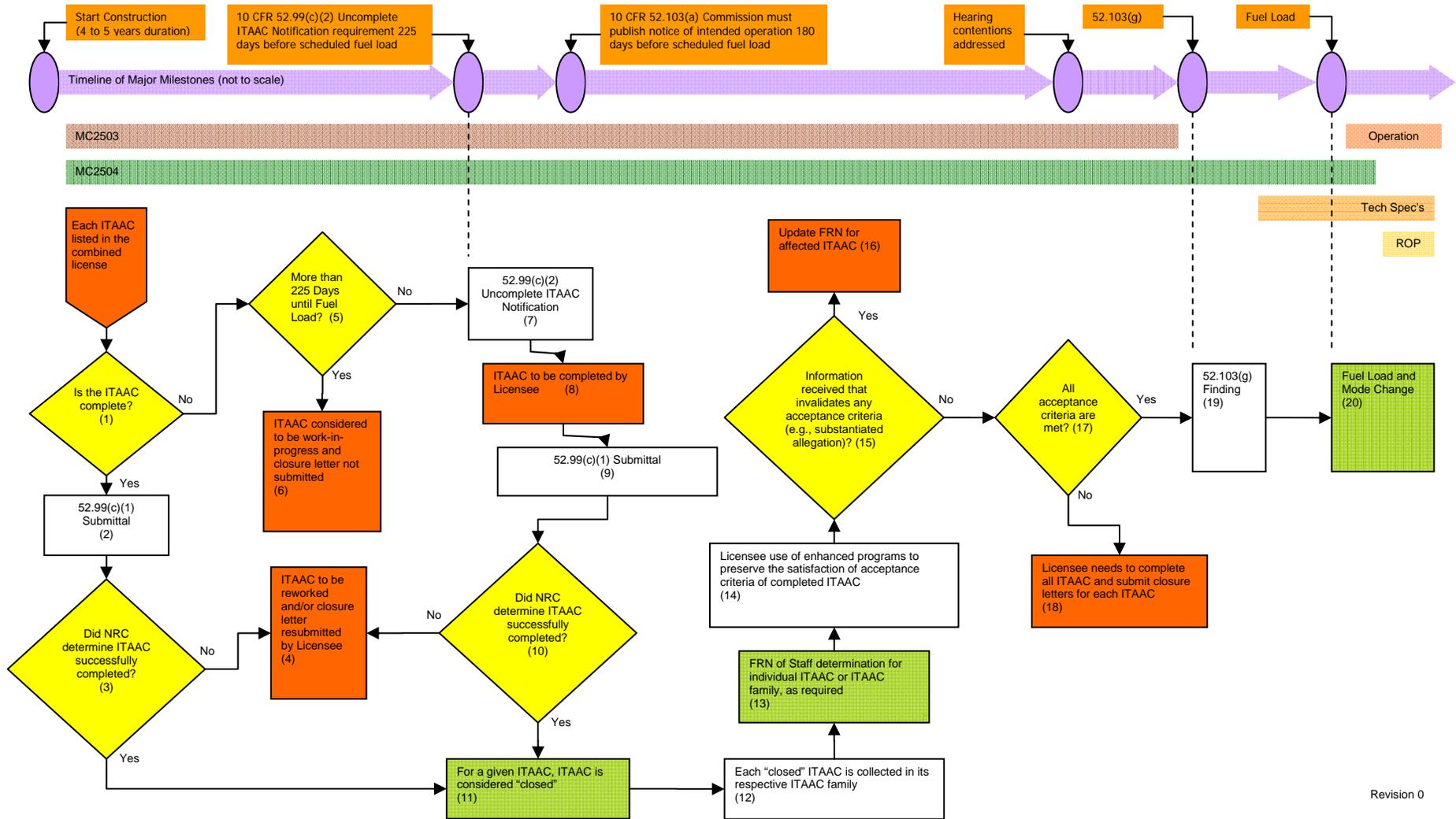


DRAFT 52.103(g) Process Flowchart and Timeline



Process block descriptions:

- (1) This is the first decision block for any given ITAAC, and the Licensee needs to assess each ITAAC from the license. Each ITAAC can enter this block at any time during construction regardless of its completed or uncomplete status for processing through this flowchart.
- (2) If (1) is 'yes', then the Licensee must submit a closure letter pursuant to 10 CFR 52.99(c)(1).
- (3) The NRC will perform ITAAC closure verification activities, including direct inspection, engineering reviews, and consideration of Licensee performance within an ITAAC family. 'Yes' indicates that the staff has determined that the ITAAC was successfully completed and is 'closed'. 'No' indicates that the ITAAC is not 'closed' and remains uncomplete.
- (4) If (3) is 'no', the NRC has determined that either the 52.99(c)(1) closure letter information is insufficient, or that the acceptance criteria has not been met for the given ITAAC. The Licensee will either need to resubmit a closure letter that contains sufficient information demonstrating that the ITAAC is complete, or the Licensee will need to rework the ITAAC and redo the inspections, tests, and analyses. In either case, the Licensee will need to resubmit the 52.99(c)(1) closure letter.
- (5) If (1) is 'no', the Licensee needs to identify if the time to scheduled fuel load is greater than 225 days. At the 225-day milestone, the Licensee is required to submit 52.99(c)(2) uncomplete ITAAC notifications for those ITAAC not yet completed and the 52.99(c)(1) closure letter not yet submitted.
- (6) If (5) is 'yes', there is no 52.99(c)(2) uncomplete notification required for this ITAAC, and the ITAAC under consideration is in the 'work-in-progress' population.
- (7) If (5) is 'no', the Licensee needs to submit to the NRC a 52.99(c)(2) uncomplete ITAAC notification. This notification needs to contain sufficient information to demonstrate that the ITAAC will be completed before the 52.103(g) hearing.
- (8) Entry here indicates that an individual ITAAC remains in the uncomplete population. Once the Licensee concludes that the acceptance criteria have been met, process block (9) is entered.
- (9) Upon successfully meeting the acceptance criteria for a given ITAAC, the Licensee can submit the 52.99(c)(1) closure letter to the NRC.

- (10) The NRC will perform ITAAC closure verification activities. This decision block is identical to block (3).
- (11) If (10) is 'yes', the NRC staff has determined that the acceptance criteria has been met.
- (12) Licensee performance within an ITAAC family is taken into consideration for determination on subsequent Licensee ITAAC submittals.
- (13) The NRC determination that an ITAAC is successfully completed is published in the Federal Register until the last date for submission of requests for hearing under 52.103(a). The NRC can publish a Federal Register Notice for individual ITAAC (if needed) or multiple ITAAC (such as an entire family). The NRC is not required to publish a Federal Register Notice after the last date for submission of requests for hearing under 52.103(a).
- (14) The Licensee will apply enhanced programs such as QA and maintenance to preserve that satisfaction of acceptance criteria for completed ITAAC of applicable structures, systems, and components (SSCs).
- (15) Allegations or other information received by the NRC, once substantiated, can invalidate an ITAAC's acceptance criteria.
- (16) If (15) is 'yes', then the Federal Register Notice for each affected ITAAC needs to be updated.
- (17) Flowchart collectively considers if all ITAAC acceptance criteria are met.
- (18) If (17) is 'no', then the Licensee needs to complete all ITAAC and make sure that all the acceptance criteria are and remain met for the 52.103(g) finding.
- (19) At the time of the 52.103(g) finding, it is required that all acceptance criteria are met, such as when (17) is 'yes'. Also, this timeline and flowchart does not contemplate an interim operation scenario, where the Commission could authorize a period of interim operation that would allow fuel load prior to making the 52.103(g) finding, per 52.103(c).
- (20) With an affirmative Commission 52.103(g) finding, the Licensee will be authorized to load fuel and enter operational status.