

Maintaining ITAAC Conclusions

NRC Construction Inspection
Program Workshop
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INTRODUCTION

- After ITAAC close-out letters are submitted, licensees must maintain the validity of ITAAC conclusions
- Licensees programs will be used to maintain ITAAC (per NEI 08-01, Section 8.1)
 - Problem Identification and Resolution
 - Construction/Maintenance
 - Configuration Control
 - Quality Assurance
- NRC should be notified when:
 - Licensee programs do not restore conformance with Tier 1/ITAAC
 - ITAAC Determination Basis in close-out letter is no longer valid
 - Required by Part 21 or 10 CFR 50.55(e)

Maintaining Closed ITAAC: Problem Identification & Resolution Program

- Conditions are screened for adverse impact on closed ITAAC
- Conditions material to ITAAC acceptance criteria are entered in Corrective Action Program
 - CAP available for NRC inspection
 - Conditions material to acceptance criteria will be specifically flagged in CAP
- Evaluate need to notify NRC beyond CAP

Maintaining Closed ITAAC: Construction/Maintenance Programs

- Corrective/preventive maintenance/troubleshooting does not invalidate acceptance criteria provided SSCs are restored to their pre-work, as-designed condition
 - State of being out-of-service (e.g., tag outs) does not invalidate prior ITAAC conclusions
 - Post-maintenance testing performed as appropriate to assure ITAAC conclusions remain valid

Maintaining Closed ITAAC: Engineering Change Program (Configuration Control Program)

- Evaluate SSC design changes (including field changes) for impact on completed ITAAC acceptance criteria
- Temporary mods
 - Controlled by design engineering authority
 - Temp mods do not invalidate closed ITAAC provided SSCs are restored to original condition
- A license amendment is required to alter Tier 1 design or ITAAC acceptance criteria (10 CFR 52.98(f))