



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

ITAAC Maintenance

December 17, 2008



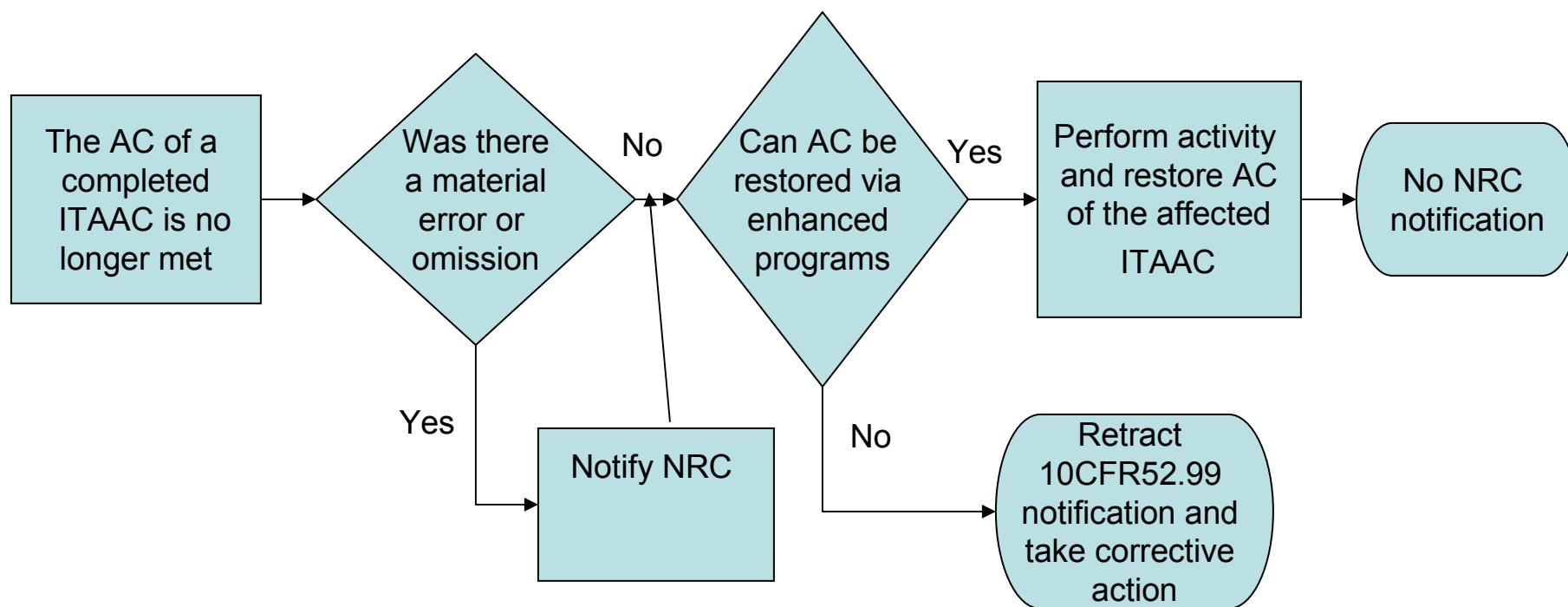
Progress to Date

- 1st NRC flowchart (slide 3) presented on August 28th initiated need for outlining requirements for NRC notification when an ITAAC's acceptance criteria is invalidated
- 2nd NEI flowchart (slide 4) presented on October 30th promoted licensee programs for corrective actions
- Comparison of flowcharts created a disconnect since the NEI version did not address a "significance threshold"
- As a result, anything could get worked w/o NRC notification - example discussed was replacing the reactor vessel



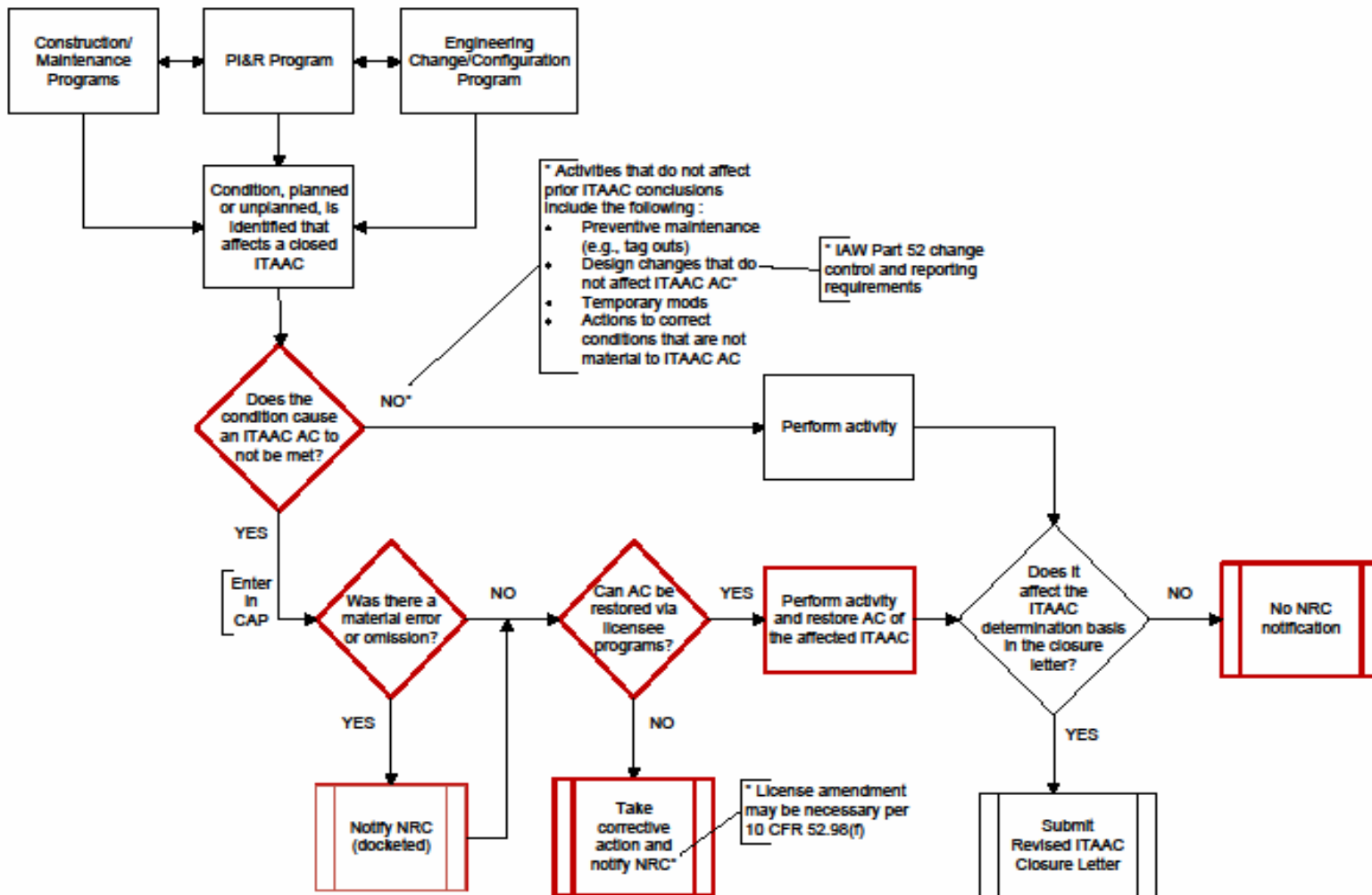
ITAAC Preservation Flowchart

from Aug 28th workshop



Licensee Maintenance of ITAAC Conclusions

Draft for Discussion – 10/30/08



Note: Licensees and suppliers must also evaluate conditions for reportability under Part 21 or 10 CFR 50.55(e)



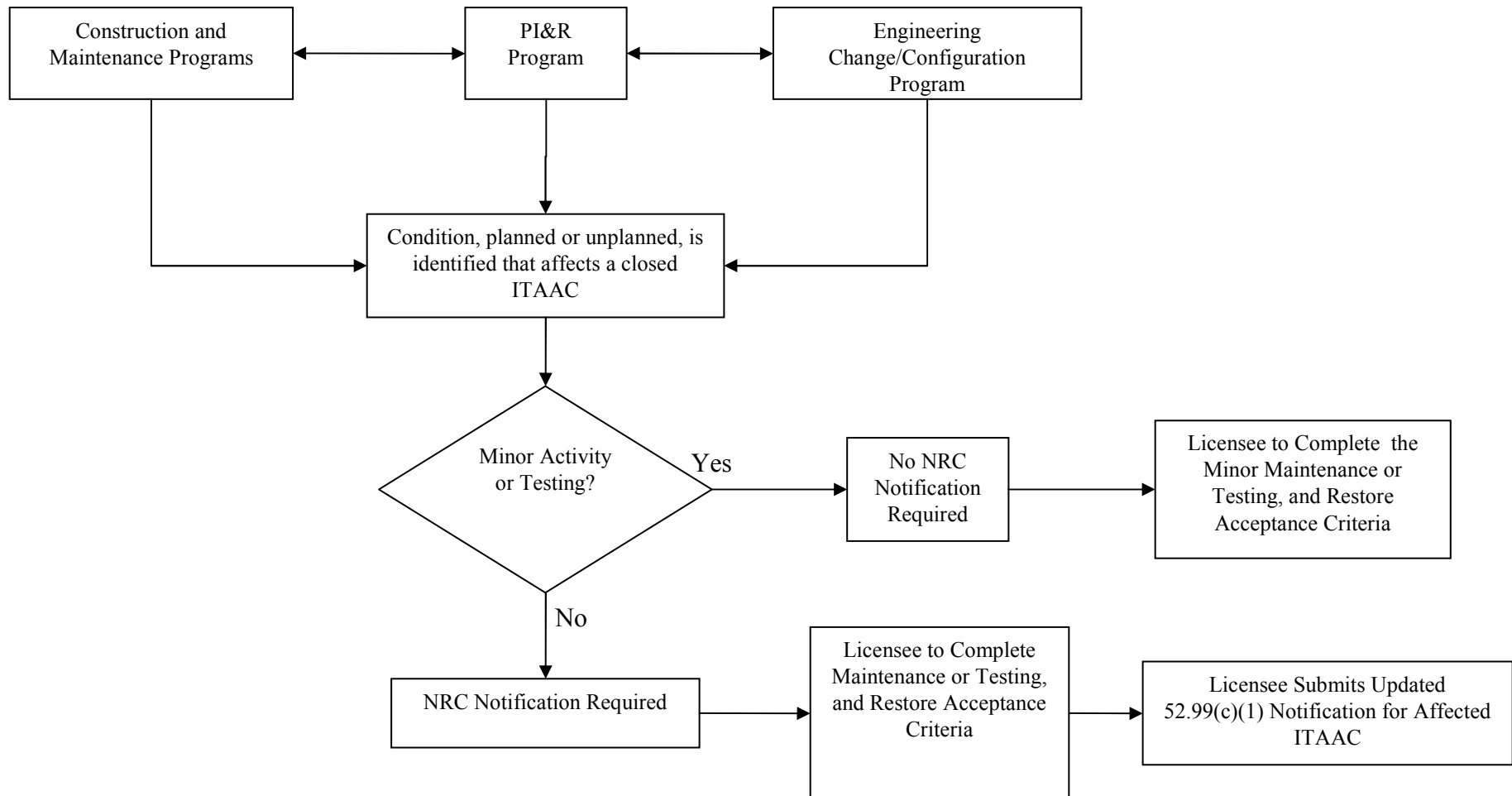
Reporting

- Significance threshold needed to determine difference between major and minor activities
- Commission SRM M081022 guidance to staff:

“The staff should continue to work with stakeholders to ensure the status of closed ITAAC is maintained, including the threshold for notification requirements. Further guidance to the staff will be provided in the SRM for SECY-08-0117”
- One possibility is Part 52 rulemaking to include ITAAC maintenance reporting requirements and an “all-done” letter from the licensee



Licensee Maintenance of ITAAC Conclusions





Minor Examples

- Change oil/filter for a safety related pump
- Replace air filter in a switchgear
- Test a battery cell
- Replace a control panel indicating status light bulb
- Add grease to an MOV or other mechanical device
- Add oil to a pump
- Clean and inspect
- Painting
- Adjust valve packing
- Some post-maintenance testing (e.g., stroke test valve after packing adjustment)



Reportable Examples

- Cutout valve and replace
- Replace the motor or gears on an MOV
- Replace speed control system for a RCIC turbine
- Rebuild an EDG with new pistons, rings, valves, and camshaft
- Remove and replace a containment spray nozzle
- Replace a battery bank
- Replace the reactor mode switch
- Replace a digital controller



Path Forward

- Develop a definition for what is considered minor activities or testing
- Everything not conforming to the minor definition would be considered reportable
- Include the new definition and examples in Chapter 8 of NEI 08-01
- Suggested definition of “Minor” inclusions -
 - Have a very low probability of adversely affecting the component or system such that the acceptance criteria of the closed ITAAC is compromised
 - Are vendor-recommended preventive maintenance
 - Do not originate from unplanned, non-conforming events
- Continue discussions for Cat 3 public workshop on January 29, 2009