Feedback on NEI 08-01
Rev 4 Draft E

Jim Gaslevic
NRO/DCIP/CTSB/Construction ITAAC Team
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General Comments

- Overall, Rev 4 captures most of the attributes of the ITAAC maintenance program

- Redline/Strikeout version for review does not show all changes from Rev 3

- Recognize that significant changes are anticipated with the changes in draft rule for 52.99 and 2.340

- ITAAC Component Replacement Letter – delete

- ITAAC Determination Basis - is the methodology for closure, and is summarized in a closure letter

- Supplemental ITAAC Closure Letter - conform to draft rule notation

- 3.1.3 - all physical security and EP ITAAC will be inspected, as described in SECY-08-0117
- 3.2.1 – conform to draft rule
  - "have been met" to "are met"
  - New 52.99(c)(3), (c)(4), and (f) sections
- 3.2.2 – recommendation to the Commission

- 3.2.4 – specify between DC or COL ITAAC regarding amendments and exemptions
  - COL ITAAC require an amendment
  - DC ITAAC require exemption and amendment
  - remove Tier 1 references
  - needs to address relationship to thresholds in more detail, specifically Threshold 3
- 3.4 – conform to draft rule
  - Add early 52.99(c)(3)(i) notifications

Chapter 5

- 5.1.2 – should address and conform to draft rule (52.99(c)(4))

- 5.1.3 – last paragraph
  - basis should include reasoning for AC valid thru final installation
  - explain how justification is technically sound
  - technical justification should be detailed element of the closure letter

Chapter 8

- 8.1 – rewrite to conform to draft rule
- 8.1.1 – QAP Paragraph, last sentence
  - Add "…should document ITAAC closure and ITAAC maintenance under their (QAP)."
  - For the CAP, Design/Confg, and Constr/Maintenance sections, 2nd to last bullet in each section: should read, "…in accordance with 10 CFR 52.99 and the guidance in Section 8.1."
  - Design/Config, Section, 1st sentence should read, "…or programs will not affect compliance with ITAAC requirements, and ensure that ITAAC…."

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- 8.1.1 – Additional edits
  - Design/Config, 2nd bullet – delete ~~supplemental~~
  - Constr/Maintenance, 2nd bullet – replace ~~testing~~ with verification
  - 2nd to last paragraph – clarification requested on what is meant by "program attributes should be implemented as appropriate prior to the utilization….."

- 8.1.2 –
  - reworded thresholds (see end slides)
  - Material Error or Omission "threshold " needed
  - "timely manner" replace with language to conform to draft Rule text
  - 2nd set of bullets
    - 1st bullet - delete ~~new~~
    - 2nd bullet – delete ~~identified to the NRC~~
  - Delete last paragraph of section 8.1.2
  - Add that the PWV, if different, should be appropriate to the situation
  - Section needs to link "engineering justification" to 1st threshold's "significantly different approach", as used in App H

Chapter 8

- 8.1.2 – section needs more expansive explanation of the thresholds

- 8.1.3 – Delete section

- 8.1.4 –

  - 3rd paragraph, end of 1st sentence – add ", provided the activities do not exceed the reporting thresholds identified in section 8.1.2."

  - 3rd paragraph, 2nd sentence – "….does not necessarily invalidate…."

  - Delete 4th paragraph

  - Will ITAAC maintenance be tracked in the CAP?

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- 8.2 – Delete section, add content to 8.1.2
- 8.6 –
  - Intro does not recognize justification cases not listed in 08-01
  - 3rd to last paragraph – remove "on an ad hoc basis"
  - 2nd to last paragraph – remove typo "in"
- 8.6.5 – Include the applicable bulleted categories to the technical justification
- 8.6.7 – 1st paragraph, last sentence, replace ~~identified~~ with summarized

Appendices D,F, & G

- App D – Maintenance affirmation in template needs to carry over into examples
  - technical justification is always required and summarized in closure letter
- App F All ITAAC Completed Letter
  - delete starting from the 3rd paragraph (Include the following . . .) on
  - replace with a statement verifying that no issues exist that may require supplemental reporting, consistent with the draft rule (52.99(f)(1))
- App G ITAAC Component Replacement Letter Template - delete

- Example 4, Page H-10

  During a subsequent drill, and after preoperational testing had been initiated while "hot ops" testing was underway, the licensee noted unanticipated high noise levels in certain areas of the plant, and there are questions as to whether the prescribed acceptance criteria remain met. The licensee now anticipates this will reflect normal plant operating conditions. Licensee has implemented the use of electronic notification media (e.g., pagers, PDAs, Blackberries, etc.) for onsite workers personnel entering these high noise areas, within the Protected Area of the plant, vice relying on the plant's public announcement system.

- Threshold 1: Post Work Verification

  Will the PWV use a significantly different approach than the original performance of the ITA as described in the original ITAAC letter?

- Threshold 2: Engineering Changes

  Is an engineering change necessary that materially alters the determination that the acceptance criteria are met?

- Threshold 3: Population of SSCs

  Will there be additional items that need to be verified through the ITAAC?

- Threshold 4: Complete and Valid ITAAC Representation

  Will any licensee activities materially alter the ITAAC determination basis?