Industry Comments on NRC Inspection Procedure 40600, "Licensee Program for ITAAC Management"

Draft for NRC discussion during 8/19/10 public meeting

Industry Comment	Recommendation
1. Title – The title of this procedure is too broad.	Based on the objectives identified in Section 40600-01, a better title might be "Licensee Program for Managing ITAAC Closure."
2. Terminology – Use correct terminology throughout the document: • The correct term is ITAAC completion package, not ITAAC closure package or ITAAC closeout package. • Refer to ITAAC closure letter, not ITAAC notification letter	Use terminology consistent with NEI 08-01.
3. Section 01.02 – Clarify requirements governing preparation and approval of ITAAC closure letters.	Consistent with Section 40600-02 and 02.01, revise Section 01.02 to say "the licensee's ITAAC process … conforms to the applicable requirements of the licensee's QAP."
4. Section 01.04 – Licensees will ensure that various existing programs contain attributes necessary for ITAAC Maintenance, e.g., QAP, Configuration, Design Control and Construction/Maintenance Programs, as discussed in NEI 08-01. Language referring to an ITAAC management *program* may create an expectation for a separate licensee program and should be avoided.	Revise Section 1.04 to refer to ITAAC maintenance processes.
5. Section 40600-02 – Typo	In 4th paragraph, the reference should be to Section 3.1.2 of NEI 08-01.
6. Section 02.02, Inspection Guidance – Inspection of the licensee's process for developing the 225 day letter and the 225 day letter itself should be	Create a separate section on inspection of the licensee's process for developing the 225 day letter and the 225 day letter itself.

separated from the inspections of ITAAC closure letters because activities related to the 225 day letter will take place at a later time.	
7. Section 02.02, Inspection Guidance Item d. – Licensee QA organizations are not expected to have a direct role in the ITAAC verification and closure process. The QA organization will audit the ITAAC verification and closure process like any other quality-related activity, consistent with the licensee's QAP.	Delete Item d. or refocus on QA organization audits of the ITAAC verification and closure process.
8. Section 02.03, Inspection Guidance Item a. – The current language "Evidence that all ITAAC sub-tier construction activities have been adequately controlled and tracked from the start of any related construction to the submittal of the closure letter" is too broad (emphasis added). As discussed in NEI 08-01, the focus of NRC ITAAC closure inspections and of the ITAAC completion package itself should be technical basis underlying the licensee's conclusion that specific acceptance criteria were met.	Item b. adequately and appropriately provides for inspection focus on the licensee's ITAAC determination basis. Thus Item a. is neither appropriate (because it is too broad) nor needed. Item a. is not consistent with NEI 08-01 and should be deleted. See separate comment on Item b.
9. Section 02.03, Inspection Guidance Item b. – "Evidence of management oversight of the ITAAC during construction" will not be part of licensee ITAAC closure documentation. Management oversight of construction, including oversight of ITAAC during construction, is beyond the scope of this procedure. NRC should assess management oversight of construction in connection with inspection of QAP implementation under as separate IP.	Revise Item b. to delete this phrase.

10. Section 02.03, Inspection Guidance Item c. – Records of QC involvement, including "hold points," should not be part of this IP. In particular, QC hold points may be part of installation and test procedures for SSCs subject to ITAAC, but hold points are not part of the ITAAC closure process.	Remove reference to QC involvement and hold points from this item. NRC would be expected to inspect QC activities in connection with inspection of QAP implementation under a separate IP.
11. Section 02.03, Inspection Guidance Item f. – Remove reference to "root cause analyses."	Refer simply to "cause analyses" to be consistent with 10 CFR 50, Appendix B, Criterion XVI requirements for significant conditions adverse to quality.
12. Section 02.03, Inspection Guidance Item g. – Several of the items listed as examples of records to be inspected under this procedure would not be expected to be part of ITAAC completion package documentation. The list appears to be a mixed bag of items that would be included, as applicable, in ITAAC completion packages and items that NRC inspectors might look at from an ITAAC closure process perspective. To avoid confusion, this distinction should be made clear.	1. Revise list to identify examples of items that may be included, as applicable, in ITAAC completion packages, with appropriate sub-bullets under that heading, i.e., • ITAAC completion packages o Test reports and supported test procedure number o Vendor or test facility reports o Procurement documents o Fabrication records for components, equipment or modules o Receipt inspection records o CMTs o CofCs o Registered PE approvals o Code design reports an data reports o Design analyses and reconciliation reports o Installation records and special process "travelers" o As-built inspections and/or walkdowns o Disposition of nonconformance and deviation reports Identify other items separately under a heading of ITAAC Closure Process that would not be part of ITAAC completion

	packages but may be appropriate to review under this procedure, i.e.,
	- ITAAC Closure Process - QA audit reports of the ITAAC closure process - Personnel qualification and training records, provided the focus is on personnel involved in the ITAAC closure process - Results of self-assessments of the licensee ITAAC closure process Construction work planning/sequence documents are beyond the scope of this IP and should be removed.
13. Section 02.04 Inspection Guidance – NEI 08-01 no longer calls for ITAAC component replacement summary letters.	Delete reference to ITAAC component replacement summary letters.