

ITAAC Schedule Submittal under 10 CFR 52.99(a)

Construction Inspection Program
Workshop

May 10, 2012



NUCLEAR
ENERGY
INSTITUTE

10 CFR 52.99(a)

Inspection during construction.

The licensee shall submit to the NRC, no later than 1 year after issuance of the combined license or at the start of construction as defined in 10 CFR 50.10(b), whichever is later, its schedule for completing the inspections, tests, or analyses in the ITAAC. The licensee shall submit updates to the ITAAC schedule every 6 months thereafter and, within 1 year of its scheduled date for initial loading of fuel, the licensee shall submit updates to the ITAAC schedule every 30 days until the final notification is provided to the NRC under paragraph (c)(1) of this section.

Background

- On Section 52.99 Inspection During Construction
[72 FR 49450]

..... The information provided by the licensee will be used by NRC in developing the NRC's inspection activities and activities necessary to support the Commission's finding whether all of the ITAAC have been met prior to the licensee's scheduled date for fuel load. Even in the case where there were no changes to a licensee's ITAAC schedule during an update cycle, the NRC expect the licensee to notify the NRC that there have been no changes to the schedule.

Background

- NRC Response to Question 12 concerning proprietary schedule information [72 FR 49366]

.... If an applicant claims that its construction schedule information submitted to the NRC is proprietary, and requests the NRC to withhold that information under the Freedom of Information Act (FOIA), the NRC will consider that request under the existing rules governing FOIA disclosure in 10 CFR 2.309(a)(4).

NEI 08-01

- **Section 4.2 on Licensee Schedule Coordination**

There will be a licensee project scheduler that provides NRC with a Level 3 schedule for ITAAC-related activities on site and off site (in vendor shops). A Level 3 schedule is considered an intermediate project schedule that establishes a project plan that (1) integrates and relates activities performed by participants in support of project milestones and deliverables, (2) embodies a critical path, resource loaded network that defines activity interfaces and dependencies, and (3) provides the basis for activities and logic in detailed execution schedules. Additional information will be made available as the NRC Scheduler determines a need and makes a request through the Project Scheduling Point of Contact. As schedules are updated, the licensee scheduler will assure that updated schedules are made available to the NRC.

To facilitate planning, tracking and communication, the schedule information for ITAAC-related activities provided to the NRC should uniquely identify all ITAAC for the project, including design certification and plant-specific ITAAC. Schedule information provided to NRC related to DAC should include the schedule for completing the additional design information necessary to implement design ITAAC, and subsequent DAC close-out following issuance of the applicable NRC inspection report.



Current Situation

- Integrated Project Schedules are provided to Region II to facilitate inspection planning
 - Contain ICN submittal information
 - Contain proprietary information
- Residents participate in schedule meetings on site

Discussion