

NEI 08-01

- NEI 08-01 Revision 3 of January 2009
 - Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
 - Benefited from NRC public workshops and NRC review and comment
 - Includes the following:
 -generic guidance for the ITAAC program for new nuclear plants licensed under 10 CFR Part 52.*
 -to provide all stakeholders a common framework and understanding of the Part 52 ITAAC closure process.*
- NEI 08-01 Revision 4 issued July 2010.
- Regulatory Guide (RG) 1.215 Revision 1 will be issued and will 'Endorse' 08-01 Revision 4

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- NEI 08-01 Draft Revision 5 delivered to the NRC February 1, 2012 for comment
- NRC Comments Delivered to NEI
 - March 15 - Editorial Comments (ML12125A186)
 - March 30 - Substantive Comments (ML12125A196)
 - May 7 - D-RAP ITAAC Comment (ML12129A061)

Example Staff Comments

- ITAAC Completion Plan QA

- 3.1.2, end of 5th para (comment #2) :

Because ITAAC have special regulatory significance under Part 52, licensees should document ITAAC completion under their QAP. Licensee and vendor processes and planning to support ITAAC execution, such as development of ITAAC Completion Plans as discussed in Section 5.1.2, need not be performed under their QAP.

- 5.1.2 ITAAC Completion Plan

The licensee and its vendors (e.g., reactor vendor, constructor, balance of plant designer, etc.) should establish a Completion Plan for each ITAAC, including:

- ☐ The activities to be conducted to perform the required inspections, tests, and analyses, and demonstrate that acceptance criteria are met; and
 - ☐ The documentation to be compiled into the ITAAC Completion Package including Principal Closure Documents to be referenced in the ITAAC Determination Basis provided in the ITAAC Closure Notification.

Comment:

Sections need to be clarified to specify what ITAAC related activities and/or documentation are subject to QAP and which are not.

Example Staff Comments

- Better Link from Templates to Writing ICNs

- Section 6, 3rd para (comment #8.1):

- Comment:

- More explanation and direction needed...more direction on how to write notifications from the examples is needed. Description here is too light for what we were looking for at the end of the demo project.

- Screening Process for ITAAC Impacts

- Section 8.1 (comment #9.2.3):

- Comment:

- More description/detail should be added under the Design/Configuration Control Program heading addressing the screening process for ITAAC impacts. This is an ACRS concern.

Pending Staff Comments

- 225 Day Uncompleted ITAAC Letter
 - Approximate time of submittal
 - Use of past tense in addition to future tense
 - ‘...reflects activities performed as of...’
 - Level of detail and type of information intended
 - How would you handle documenting CAs taken and not yet taken for ITAAC findings?
 - ITAAC surge mitigation strategy
- ITAAC Findings
 - Definition – A technical finding that is associated with a specific ITAAC and is material to the ITAAC acceptance criteria. (IMC 2506)
 - ICNs should include an indication that all ITAAC findings have been closed

Staff Comments to Discuss

- 1 - Delete 3rd paragraph in 3.1.1

~~There may be programmatic QA/QC deficiencies that are not relevant to one or more aspects of a given ITAAC under review and, therefore, should not be relevant to or considered in the NRC's determination as to whether that ITAAC has been successfully completed. Similarly, individual QA/QC deficiencies unrelated to an aspect of the ITAAC in question would not form the basis for an NRC determination that an ITAAC has not been met. NUREG 1789, p. C-6.~~

- 5 – Delete last sentence from 8th paragraph in 3.1.4

The NRC will make publicly available the licensee notifications submitted under Section 52.99(c). See 10 CFR 52.99(e)(2). If the NRC determines after an ITAAC Closure Notification has been submitted that an ITAAC was, in fact, not met, the licensee would be subject to an ITAAC Finding. ~~In determining the significance of an ITAAC Finding, the NRC should weigh the circumstances that led to the submittal of information later found to be incorrect.~~

- 6.7.3 - Introduce early notification e-mails in 3.2.1 (5th or 6th non-italic paragraph).

Staff Comments to Discuss

- 7.1 - Why was the format of the Completion Package in 5.2 changed from the standard format?

- 7.2 – Edits to 5.1.2, 2nd paragraph:

Licensees may choose to include other information, e.g., preliminary ITAAC Determination Basis, in ITAAC Completion Plans to facilitate the ITAAC completion process. Licensees may also want to discuss or share the Completion Plan, including the expected content of ITAAC Completion Packages, with the NRC to support effective inspection planning and to ensure NRC alignment of expectations are met concerning ITAAC closure.

- 11.1 - Chapter 10 ‘Special ITAAC Closure Topics’ a good choice for surge mitigation to at least be acknowledged.
- 13.2 - NEI defend or delete 10.1.2, 4th paragraph:

Major changes to the methodology utilized in the initial design or significant changes in the scope of the design (i.e. a new piping subsystem) would require a License Amendment Request. Submittal of such an LAR would obviate the need to submit a Supplemental ITAAC Closure Notification.

Staff Comments to Discuss

- 14.1 - Edits

- 10.5, 3rd para:

The purpose of the system Functional Arrangement ITAAC, and the associated ITAAC Closure Notification, is to verify and document that the as-built system components conform to the Tier 1 Design Description, that is, (1) that components are physically arranged as shown in any referenced figure, and located as identified in any referenced table; and (2) that system components identified in the Tier 1 Design Descriptions are installed **physically arranged in the locations specified in detailed construction drawings**.....

- 14.2 - Edits

- 10.5, 4th para:

Some system Functional Arrangement ITAAC do not refer to simplified figures or tables. For these Functional Arrangement ITAAC, it is sufficient for ITAAC Closure Notifications to state that inspections were performed and confirmed that the system is installed **physically arranged to b** consistent with the Tier 1 Design Description. As with other systems, the capability to perform required system safety functions described in the Tier 1 Design Description is verified by other ITAAC.

- 18.2 - List of ICN Templates indicate that D-18 and D-20 are being deleted – why are they?