ITAAC Notifications and ITAAC Numbers

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Background

- During a public meeting on 9/22/14, the Staff discussed options to lessen resource burdens on petitioners from having to track the closure of large numbers of uncompleted ITAAC.

- The Staff suggested 3 options:

  – The later ICN would cite the corresponding UIN.

  – The later ICN would include the corresponding UIN as an attachment.

  – The later ICN would include a redline attachment showing differences between the ICN and the UIN.

Background (cont.)

- At the 9/22/14 meeting and in a 10/15/14 letter, the industry:

  – Questioned the necessity of taking any additional measures given the public's ability to cross-reference UINs and later ICNs.

  – Did not oppose less burdensome measures, such as Option 1, but opposed Options 2 and 3.

  – Suggested that the Staff could address its concerns by enhancing the plant-specific ITAAC closure status reports on the NRC website.

  – Suggested that the Staff's concerns be addressed via RG 1.215.

Staff's Response

- The Staff agrees that the public can use ITAAC numbers to cross-reference UINs and ICNs.

- But current practice makes this more difficult.

  – ITAAC Index Numbers (which go from 1 to 875) are inconsistently used (Vogtle uses them but V.C. Summer does not).

  – Staff and licensees are not using the same terminology (Staff uses "Sequence Number" rather than "Index Number").

- ITAAC numbers should be prominently placed in ITAAC notifications and used consistently.

Staff's Proposed Resolution

- RG 1.215, Rev. 2, will include the following:

  - The Staff will adopt the term "ITAAC Index number."

  - The ITAAC number that refers to the Section of the COL ITAAC appendix will be called an "ITAAC Section Number."

  - Both the ITAAC Index Number and the ITAAC Section Number will be placed in the subject line of each ITAAC notification.

  - The simpler Index Number will facilitate cross-referencing while the Section Number will facilitate locating the ITAAC in the COL ITAAC appendix.

Staff's Proposed Resolution (cont.)

- The Staff will enhance the plant-specific ITAAC closure status reports on the NRC website to make them more user-friendly.

- The notice of intended operation would instruct petitioners on how existing resources can be used to cross-reference UINs and ICNs.

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Questions?