

Westinghouse Electric Company

ITAAC Maintenance Applicability to DAC and DRAP

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Background

- 10 CFR 52.103(g) requires a finding that the Acceptance Criteria are met
- Between ICN Submittal and the 103(g) finding, Licensees use established programs to maintain the validity of prior ITAAC conclusions
- Guidance on “ITAAC Maintenance” provided in NEI 08-01 and RG 1.215, including thresholds for when NRC notification is required

Applicability to DAC and DRAP

- ITAAC Maintenance is applicable to all ITAAC*
- It is unlikely that a Supplemental ITAAC Closure Notification would be necessary for DAC or DRAP
 - Changes made in accordance with the methodology/process do not exceed a defined threshold
 - Major changes to the scope or methodology would require a License Amendment Request and prior NRC approval
- As-built ITAAC confirm construction in accordance with the licensed design

* Except for those ITAAC closed at the time of COL, per 10 CFR 52.97(a)(2)

ITAAC Maintenance Thresholds

- Material Error or Omission – equally applicable to all ITAAC, including DAC and DRAP
- Post Work Verification – applicable only to re-performance of an ITA on as-built SSC's. Will not affect DAC or DRAP.
- Engineering Changes – changes made in accordance with the methodology/process from the initial analysis would not “materially alter the determination that the acceptance criteria are met.” Changes in methodology would likely require a LAR.

ITAAC Maintenance Thresholds

- Additional Items to be Verified – Major scope changes (i.e., a new piping subsystem) would require a change to Tier 1 information. Minor changes are controlled by the design methodology and verified by As-Built ITAAC.
- Complete and Valid Representation – applicable to all ITAAC. Would only exceed threshold if a material error in a Principal Completion Document for the closed ITAAC were discovered.

Summary

- ITAAC Maintenance is applicable to DAC and DRAP
- The “As-Designed” nature of these ITAAC make it unlikely to exceed a threshold requiring NRC notification under the proposed 10 CFR 52.99(c)(3)