

August 17, 2001

MEMORANDUM TO: Marsha Gamberoni, Section Chief  
New Reactor Licensing Project Office  
Office of Nuclear Reactor Regulation

FROM: Joseph M. Sebrosky, Project Manager */RA/*  
New Reactor Licensing Project Office  
Office of Nuclear Reactor Regulation

SUBJECT: NOTICE OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE  
(NEI) TO DISCUSS INSPECTIONS, TESTS, ANALYSES, AND  
ACCEPTANCE CRITERIA (ITAAC) RELATED TO NUCLEAR POWER  
PLANT CONSTRUCTION

DATE AND TIME: September 7, 2001  
8:30 a.m. - 11:30 a.m.

LOCATION: U. S. Nuclear Regulatory Commission  
Two White Flint North  
11545 Rockville Pike, Room T-10 A1  
Rockville, Maryland 20852-2738

PURPOSE: To discuss ITAAC verification and related issues. The meeting is a  
continuation of a June 15, 2001, meeting with NEI (See attached for  
discussion topics).

PARTICIPANTS\*: Participants from the Nuclear Regulatory Commission (NRC) include  
members of the Office of Nuclear Reactor Regulation.

<u>NRC</u>	<u>NEI</u>
M. Gamberoni, NRR	R. Bell, et al.
J. N. Wilson, NRR	
J. Sebrosky, NRR, et al.	

cc: See next page

CONTACT: J. Sebrosky  
301-415-1132

\*Meetings between NRC technical staff and applicants or licensees are open for interested members of the public, petitioners, intervenors, or other parties to attend as observers pursuant to the Commission Policy Statement on "Staff Meetings Open to the Public: Final Policy Statement," 65 FR 56964, September 20, 2000. Persons attending the meeting will be given the opportunity to express their individual views on topics under discussion during the course of the meeting.

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ACCESSION NUMBER:

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DATE	8/16/2001	8/16/2001

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September 7, 2001,  
Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)  
Meeting Discussion Topics

**Meeting purpose:** (1) NEI requested a meeting with the NRC to continue the exchange of views begun on June 15 and to get NRC insights/input on additional industry views and proposals, and (2) To identify the range of issues and sensitivities that should be factored in to the envisioned industry white paper on this topic.

NEI identified the following areas for topics of discussion for the meeting

1. Handling of ITAAC completed and 52.99 notices issued following the 180-day notice of intended operation and post-construction hearing opportunity
2. Handling new information that invalidates a completed ITAAC following a 52.99 notice
3. Clarification of the role and intent of NRC's envisioned engineering design verification (EDV), in particular that:
  - EDV would establish confidence in the licensee's design engineering process (analogous to construction process inspections discussed on June 15)
  - ITAAC completion is not required to support EDV by NRC
  - Satisfactory design engineering processes as determined by NRC are not part of the specific ITAAC determination bases subject to challenge under 52.103, except as specifically verified by NRC for design acceptance criteria included in the combined license (COL)
4. Nature of expected NRC pre-operational inspections of licensee operational programs (and associated documentation) and transition to power operations, including adaptation of concepts, principles and approaches established for the revised Reactor Oversight Program.
5. Developing an effective framework for identifying ITAAC determination bases (IDB) and key supporting quality assurance program (QAP) information (as an alternative to SECY-94-294, Attachment 1) to:
  - Reinforce the respective roles of the licensee and NRC and the distinction between ITAAC and other QAP information with respect to determining whether deficiencies/contentions are material to the ITAAC finding and thus potentially within the scope of the 52.103 hearing
  - Facilitate discussion and agreement on representative examples of IDB that would be provided as guidance for later use by licensees and NRC in developing plant-specific construction inspection plans. Examples might include basic configuration and other "boilerplate" ITAAC, instrumentation and control design

acceptance criteria, and advanced boiling water reactor (ABWR) ITAAC  
2.15.12.5 on main control area fire rating (mentioned in SECY-94-294)

Additional topics for discussion

1. Sufficiency of existing risk analysis information approved as part of the design certifications, including the design certification probabilistic risk assessment (as supplemented to reflect site-specific information), to facilitate safety-focused plant-specific construction inspection activities, e.g., “risk-informed smart sampling”
2. When must NRC tools (e.g., inspection procedures, etc.) be ready to support detailed plant-specific interactions between NRC and the applicant on construction planning, sequencing and inspection activities? How does this differ if a COL references a design certification versus for a custom plant scenario (e.g., pebble bed modular reactor)?
3. What are the potential issues associated with detailed plant-specific construction inspection program development, including information management system development by NRC and the applicant, compatibility issues, information sharing protocols, and related issues.