

May 7, 2003

MEMORANDUM TO: Marsha Gamberoni, Deputy Director  
New Reactor Licensing Project Office  
Office of Nuclear Reactor Regulation

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

SUBJECT: FORTHCOMING MEETING WITH THE NUCLEAR ENERGY  
INSTITUTE (NEI) TO DISCUSS INSPECTIONS, TESTS, ANALYSES  
AND ACCEPTANCE CRITERIA (ITAAC) FOR OPERATIONAL  
PROGRAMS AND 10 CFR PART 52 COMBINED LICENSE ISSUES

DATE & TIME: Thursday, May 22, 2003  
9:00 a.m. - 12:00 Noon

LOCATION: U.S. Nuclear Regulatory Commission  
Two White Flint North  
11545 Rockville Pike, Room T-3 B45  
Rockville, Maryland 20852

PURPOSE: To discuss with NEI ITAAC for operational programs  
(e.g., programmatic ITAAC) and 10 CFR Part 52 combined license  
issues. An agenda and background material for the meeting are  
attached.

CATEGORY 2:\*

PARTICIPANTS: Participants from the NRC include members from the Office of Nuclear  
Reactor Regulation (NRR) and the Office of the General Counsel.

<u>NRC</u>	<u>Nuclear Energy Institute</u>
J. Lyons, NRR	R. Bell, et al.
R. Weisman, OGC	
J. Sebrosky, NRR, et al.	

Attachments: 1. Agenda  
2. Background Material

Project No. 689

cc: See next page

CONTACT: Joseph M. Sebrosky, NRR  
301-415-1132, jms3@nrc.gov

\*Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings,"  
67 *Federal Register* 36920, May 28, 2002

Agenda  
May 22, 2003 Meeting  
with NEI

9:00 a.m.	Introductory Comments	NEI/NRC
9:10 a.m.	Discussion of response to staff requirements memorandum (SRM) dated September 11, 2002, regarding programmatic ITAAC (The ADAMS Accession Number for the SRM is ML022540755. Additional background is contained in attachment 2 to the announcement.)	NRC
9:30 a.m.	Discussion of programmatic ITAAC response	NRC/NEI
10:30 a.m.	Identification and plans for addressing 10 CFR Part 52 combined license (COL) issues	NRC/NEI
11:45 a.m.	Public Comment	
11:55 a.m.	Summary	
12:00 Noon	Adjourn	

**NOTE: Specific topics and associated discussion times may change without notice**

**Contact:**  
**Joseph M. Sebrosky, NRR**  
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## Background Material for Programmatic Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

### Description of the Issue

In SECY-02-0067, "Inspections, Tests, Analyses, and Acceptance Criteria for Operational Programs (Programmatic ITAAC)," the staff requested Commission approval for its position that combined licenses (COLs) for a nuclear power plant submitted in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52 Subpart C contain ITAAC for operational programs required by regulations such as training and emergency planning (ADAMS Accession Number ML020700641). The Commission provided its response in a September 11, 2002, staff requirements memorandum (ADAMS Accession Number ML022540755).

### Discussion Topics

The staff would like to discuss a response to the staff requirements memorandum (SRM) including a discussion of the following option. A draft standard review plan (SRP) Section 14.3 Appendix E, "Programmatic ITAAC" would be developed for guidance. The staff is considering categorizing the 14 programs that it listed in SECY-02-0067 in the following manner as part of this guidance:

- Category A: Programmatic ITAAC are required. A program that falls into this category is emergency planning.
- Category B: Programmatic ITAAC are not necessary because hardware-related ITAAC address the results to which the program is directed. Examples of programs that may fall into this category are equipment qualification, quality assurance, and containment leak rate testing.
- Category C: An ITAAC for a program or elements of the program is not necessary because the program and its implementation can be fully described<sup>1</sup> in the application and found to be acceptable at the COL stage.<sup>2</sup>
- Category D: An ITAAC for a program or elements of the program is necessary because the program and its implementation cannot be fully described<sup>1</sup> in the application. That is, the COL applicant cannot provide the necessary and sufficient programmatic information for approval of the COL without ITAAC.<sup>2</sup>
- Category E: An ITAAC for a program is not necessary because ITAAC will be dispositioned prior to fuel load and the program is not required to be implemented until after fuel load. Examples of programs that may fall into this category include the inservice inspection and inservice testing programs, and the maintenance rule program.

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<sup>1</sup> A principal issue for these categories is what constitutes a "fully described" program.

<sup>2</sup> The following programs may fall into Category C or D depending on the information provided at the time of the COL: fire protection, radiation protection, security, fitness for duty, training, access authorization, reportability, licensed operator training.

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issues. An agenda and background material for the meeting are  
attached.

CATEGORY 2:\* The public is invited to participate in this meeting by discussing  
regulatory issues with the NRC at designated points on the agenda.

PARTICIPANTS: Participants from the NRC include members from the Office of Nuclear  
Reactor Regulation (NRR) and the Office of the General Counsel.

NRC

J. Lyons, NRR  
R. Weisman, OGC  
J. Sebrosky, NRR, et al.

Nuclear Energy Institute

R. Bell, et al.

Attachments: 1. Agenda  
2. Background Material

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\*Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings,"  
67 *Federal Register* 36920, May 28, 2002

Accession No. ML031250609

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