

**RIC 2006
Session - Th5F
Construction Inspection Program and ITAAC**

What You Need To Know About ITAAC



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What is an ITAAC?

- Inspections, tests, analysis and acceptance criteria
- Provision to a combined license
- Successful completion of all ITAAC demonstrates that plant constructed in accordance with the atomic energy act, the regulations, and the license

Format of an ITAAC

Design commitment

- Key features from design basis

Inspections, tests and analyses

- What observations, tests or examinations will be done to determine if the commitment was met?

Acceptance Criteria –

- taken from assumptions in Safety Analysis

How does an ITAAC work?

- The list of ITAAC are submitted with the COL application.
- NRC reviews and approves the ITAAC and incorporates them as part of the license.
- NRC inspectors watch the licensee perform ITAAC-related activities during construction.

Not all ITAAC are created equal

Design Commitment	Inspection Test Analysis	Acceptance Criteria
Safety related displays in the main control room can be retrieved	Simple inspection	Safety related displays can be retrieved in the main control room
ASME code piping retains pressure boundary integrity at design pressure	Report demonstrating piping meets ASME code	A report exists and concludes that piping meets requirements of ASME code

Closing an ITAAC

- The licensee informs the NRC when each ITAAC has been met
- NRC reviews ITAAC closeout letters:
 - Licensing performs acceptance review
 - Region examines inspection record for that ITAAC
 - Licensing documents the basis for the ITAAC acceptance criteria being successfully met
- A notice is published in the *Federal Register*

Optional Hearing

- Notice of intended operation published in *Federal Register* 180 days before scheduled fuel load
- Any person whose interest may be affected by operation of the plant can request a hearing
- Hearing granted if prima facie evidence supports:
 1. One or more ITAAC acceptance criteria have not or will not be met
 2. Operational consequences of nonconformance contrary to providing reasonable assurance of adequate protection

When does it end?

- When the NRC concludes that all of its inspection of ITAAC are complete,
- When all of the Federal Register Notices are published, and
- When the Commission makes a finding in accordance with 10 CFR 52.103(g) and fuel is loaded
 - Condition of license satisfied

Licensee ITAAC Closeout Letter Content

- Industry Position: Roadmap for successful ITAAC completion available at plant site but not on docket
- NRC Position: Closeout letter provides references to upper tier documents that form basis for successful ITAAC completion
 - NRC will provide basis for successful ITAAC completion in the *Federal Register* notice
 - NRC letter dated November 21, 2005, provides examples of information that would satisfy NRC position