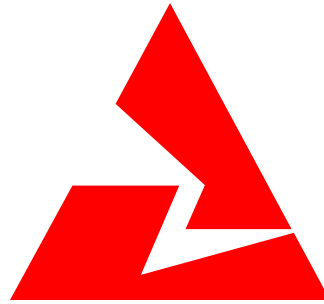


“ITAAC Closeout: Where Licensing and the Construction Inspection Program (CIP) come together”

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ITAAC Inspection Under Part 52

- ITAAC are focused on the top-level plant design features and plant performance characteristics and have been purposely crafted to be as clear and objective as possible
- ITAAC are a key subset of the normal plant construction, inspection, and test activities performed by the licensee under the Quality Assurance Program (QAP)
- The licensee implementation of a robust QAP in conjunction with the NRC Construction Inspection Program (CIP) will assure the quality of licensee design, construction and testing activities



The Role of ITAAC and the QAP

- The role of ITAAC is different from the role of the QAP
- ITAAC focus on verifying the as-built plant satisfies the top level design and performance standards specified in the COL
- The QAP assures the adequacy of quality related design and construction activities
- ITAAC provide for “end of process” determinations and not the day-to-day oversight of the construction process the QAP provides



ITAAC Closeout Implementation

- When the licensee has determined that one or more ITAAC have been completed, an ITAAC Determination Letter will be sent to the NRC
- The ITAAC Determination Letter will:
 - Clearly identify which ITAAC has been completed
 - Reference the ITAAC Determination Bases (IDB) Documents
 - State the ITAAC IDB Documents are available for audit
 - Request NRC verification and confirmation of satisfactory ITAAC completion and notice in the Federal Register per 10 CFR 52.99



ITAAC Closeout Implementation – *cont'd*

- Advance licensee interactions with the NRC and NRC's comprehensive ITAAC focused oversight activities (documented in NRC inspection reports) are expected to facilitate timely ITAAC verification by the NRC
- Deficiencies in the IDB identified during NRC verification will be referred to the licensee's CAP (Corrective Action Program)
- Unless the deficiency is material to the ITAAC determination, a successful ITAAC completion notice should be issued by the NRC
- If a deficiency is material to the ITAAC determination, the licensee must take appropriate corrective action before the ITAAC can be closed out



ITAAC Determination Bases

- The ITAAC Determination Bases (IDB) document specific inspection, test, or analysis results on which the licensee's ITAAC determinations will be based
- The IDB for a given ITAAC is the licensee record or records that correspond to the specific acceptance criteria specified in the ITAAC
- Cooperative Meetings and Workshops have been held with NRC to strive for a common understanding of the ITAAC demonstration process and its use by the NRC as part of the CIP
- The NRC letter dated November 21, 2005 provided examples of IDB level of detail to be included in the ITAAC Determination Letter



ITAAC Determination Bases – *cont'd*

- The industry considers the NRC examples insightful relative to the appropriate IDB documents released in the ITAAC Determination Letter
- The NRC examples include some references (e.g., procurement documents, receipt inspection records, certificates of compliance and certified material test reports) the industry considers will be available as part of the underlying QA record package and not directly part of the IDB
- Industry and the NRC are still working to achieve a common understanding with respect to the IDB and the NRC ITAAC verification process

