

## Sample 225-Day ITAAC Letter

XX/YY/ZZZZ (Date) (225 days before scheduled fuel load)

To: NRC

From: {Name of Licensee}  
{Site Name and Unit #(s)}  
{Docket #(s)}

**Subject: 225-Day Notification for AP1000 ITAAC Item 2.5.2-8, #10**

Pursuant to 10 CFR 52.99(c)(2), {Licensee} is notifying the NRC that {Site Name and Unit #(s)} Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.5.2-8, #10 for the Protection and Safety Monitoring System (PMS) will not be completed 225 days prior to initial fuel load currently scheduled for {month, day, year}. However, ITAAC 2.5.2-8, #10 will be completed prior to operation. This notification is based on the guidance described in NEI-08-XX (Reference 1).

### **ITAAC Statement**

#### Design Commitment

*Setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.*

#### Inspection/Test/Analysis

*Inspection will be performed for a document that describes the methodology and input parameters used to determine the PMS setpoints.*

#### Acceptance Criteria

*A report exists and concludes that the PMS setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.*

### **Actions for ITAAC Closure**

Instrument setpoints for permanently installed instrumentation are determined using methodology specified in Procedure XXX, *Instrument Uncertainty and Setpoint Calculation Guidelines* (Reference 2). This methodology accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation. Procedure XXX is used at {Licensee's operating units} giving additional validity and assurance to the methodology.

The setpoints for PMS have been determined using Procedure XXX and documented in Engineering Report YYY, *Setpoint Determination for the Protection and Safety Monitoring System* (Reference 3).

## Sample 225-Day ITAAC Letter

In order to close ITAAC 2.5.2-8, #10, {Licensee} will complete an inspection of Engineering Report YYY. The purpose of the inspection is to confirm that the PMS setpoints are determined using Procedure XXX and that the procedure specifies a methodology that takes into account instrument loop uncertainties and inaccuracies, response testing results, and maintenance or replacement activities. To date, {Licensee} has completed approximately XX% of the inspection. This inspection will be documented in an ITAAC closure inspection report, which will be available for NRC review.

### **ITAAC Closure Schedule**

{Licensee} is tracking ITAAC 2.5.2-8, #10 in its ITAAC database and is scheduled to perform the inspection of Engineering Report YYY on or about {month, day, year}. {Licensee} expects satisfactory results since, as mentioned above, Procedure XXX is successfully used at {Licensee's operating units}.

If the NRC has any questions regarding this ITAAC item, please contact {name of contact person for Licensee} at {telephone # for contact person}.

Sincerely,

{Signature of Licensee Representative}  
{Typed Name of Licensee Representative}  
{Title of Licensee Representative}

### **References**

1. NEI 08-XX, *ITAAC Close-Out Process Guidelines*
2. Procedure XXX, *Instrument Uncertainty and Setpoint Calculation Guidelines*
3. Engineering Report YYY, *Setpoint Determination for the Protection and Safety Monitoring System*