



U.S. NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

“No Entry” Definition & Public Release of Targeted ITAAC

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No Entry System Examples

- These systems have very low or no risk significance and are not considered to be ITAAC.
- Examples include:
 - Elevator
 - Zinc injection system
 - Condenser cleanup facility
 - Sanitary drainage system
 - Hot water heating system



“No Entry” Systems

- The design control documents for AP1000 and ABWR, have certain Tier 1 ITAAC System tables that state “No Entry for this system”.
- Many combined license (COL) applications also use “No Entry”.
- No Entry systems were not counted as ITAAC for inspection purposes and were not included in the ITAAC inspection matrix.
- There will be no ITAAC verification for the "no entry ITAAC" systems.



Public Release of Targeted ITAAC

- The public release of the targeted ITAAC lists promotes openness and transparency in the NRC regulatory process. Openness and transparency will provide an opportunity for stakeholders to better understand, scrutinize, and provide feedback on the construction inspection program.
- Release of the targeted ITAAC list for inspection would be consistent with the NRC practices under the reactor oversight process (ROP).



Public Release (Continued)

- Typically, but not always, the ITAAC closure verification inspections are based on a “sample-of-the-sample” approach. Using this approach the list of targeted ITAAC does not provide details on the specific item(s) that will be directly inspected.
- The licensee remains responsible for submitting a notification letter in accordance with 10 CFR 52.99, “Inspection during Construction,” that each and every ITAAC has been completed satisfactorily.



Public Release (Continued)

- Inspection of construction processes and programs will be performed independent of targeted ITAAC. The staff developed Inspection Manual Chapter (IMC) 2504, “Non-ITAAC Inspections,” that implements inspection of licensee construction and operational programs., pre-op. and startup testing, and operational readiness.
- The public release of targeted ITAAC lists will facilitate the exchange of schedule information with the licensees which will enable the NRC to more effectively and efficiently schedule inspections.