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

Maintaining Completed ITAAC Thru the 52.103(g) Finding

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August 28, 2008 Public Meeting

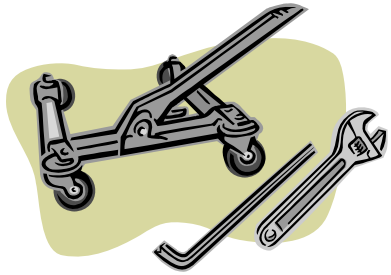
Introduction

- The acceptance criteria (AC) of all ITAAC must be met when the 52.103(g) finding is made by the Commission which authorizes initial reactor fuel load.
- The staff anticipates there may be situations, where ITAAC that have been completed and reported per 52.99, will require maintenance or modification.
- NRC and industry agreed to use *enhanced programs* (eg., PI&R, maintenance, and engineering change) to restore the AC of ITAAC.
- Other functional areas such as security and emergency preparedness have ITAAC and are subject to the same consideration for reporting to the NRC.

Problem Identification & Resolution

- All problem reports should be screened to identify any conditions, related to 52.99 notifications for completed ITAAC, that invalidates the AC.
- These conditions/events must be assessed to determine the need to notify the NRC pursuant to 52.6 and/or 52.99.
- Additionally, other regulatory requirements must be considered including 50.55(e) and Part 21 notifications.

Maintenance Program

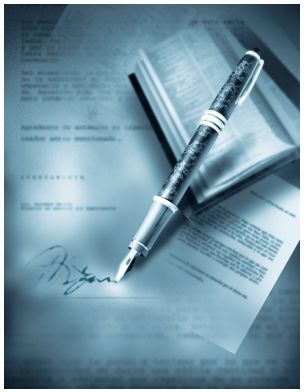


- The post work test (PWT) should validate that any work performed on an SSC related to an ITAAC is tested in a way that ensures the AC is met.
- This also applies during any maintenance troubleshooting or minor maintenance activities.
- Additionally, maintenance performed on adjacent SSCs should not interfere with the function of an SSC covered by a completed ITAAC.

Engineering Change Process

- Any design changes on SSCs related to a completed ITAAC must be evaluated to ensure the AC is not invalidated.
- Particular focus needed on field modifications and temporary modifications.
- A license amendment or exemption is required to alter the AC of a completed ITAAC.

52.99 Notifications



- 52.99 notifications of completed and uncompleted ITAAC are subject to the requirements of 10 CFR 52.6.
- Licensees should notify NRC of any *unplanned* event where the AC of a completed ITAAC is no longer met.
- Licensees should promptly notify NRC if the AC of a closed ITAAC cannot be restored.

Examples For Discussion

- A maintenance problem, like the use of the wrong oil or grease which does not damage the component or call into question the validity of the AC still being met. (Note there may be cases where the wrong lubricant could render the component inoperable and invalidate the AC). The AC is restored.
- A testing problem, like the conduct of a separate ITAAC test somehow damages a component or system for which the ITAAC 52.99 letter has already been submitted. The damaged component or system is promptly identified and corrected under enhanced programs. The AC is restored.

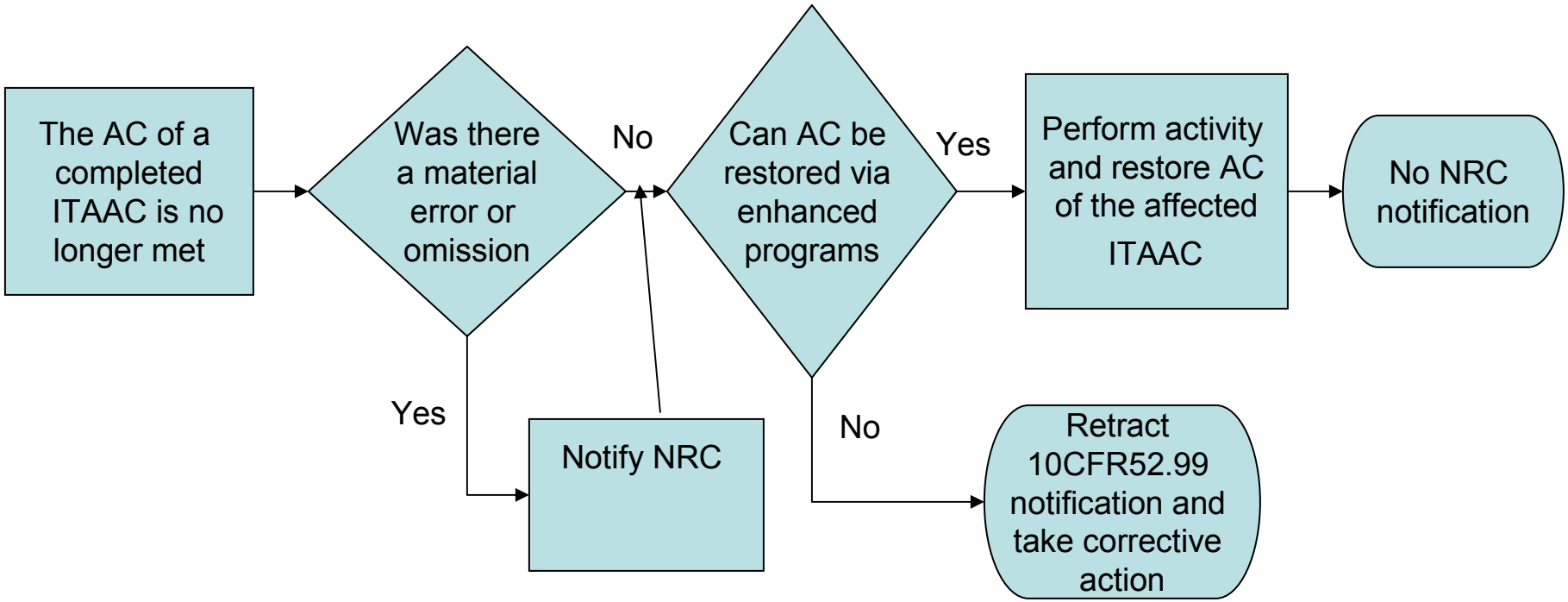
Examples For Discussion (Continued)

- A forklift hits the pump and destroys it to the extent that it needs replacement and the licensee replaces the pump with one of a different manufacturer, model and characteristics.
- After the turnover of a system to the Operations Department, a test similar to the one that qualified the ITAAC is performed as pre-Technical Specifications check and the system fails.
- Non-safety cable (not IEEE “associated” cable) are found running in a dedicated safety-related cable tray. This was clearly missed by construction and QA inspections.

Screening Criteria To Determine Need For NRC Notification

- Is the condition related to an SSC of a completed ITAAC for which the licensee had notified the NRC as completed via 10 CFR 52.99?
- Was the condition pre-planned (for maintenance or modification); or did it result from an event or reactive nature?
- Did the condition reveal incorrect information that was sent to the NRC and was a material error or an omission?
- Can the condition be resolved/corrected to restore the AC of the related ITAAC using enhanced programs?

ITAAC Preservation Flowchart (Draft)



Conclusions

- Areas of Concern
- Next Step(s)
- General comments and questions