NEI - Russ Bell Presentation

Maintaining ITAAC Determinations

NRC Public Meeting
December 17, 2008

1

INTRODUCTION

- After ITAAC close-out letters are submitted, licensees must maintain the validity of ITAAC determinations
- Licensees programs will be used to maintain ITAAC (per NEI 08-01, Section 8.1)
  - Problem Identification and Resolution
  - Construction/Maintenance
  - Configuration Control
  - Quality Assurance
- ITAAC determinations are maintained provided SSCs restored to pre-work, ITAAC compliant condition via licensee programs

2

When to Formally Notify NRC

- Material error or omission
- SSCs that can't be restored to design condition
- Design change implemented that causes Tier 1 and/or ITAAC requirements to not be met
- Licensee activities affect ITAAC determination basis
- Replacement of basic components identified as part of a closed ITAAC

3

Routine Communication on ITAAC Maintenance

- Issues material to closed ITAAC Acceptance Criteria documented in CAP
- NRC resident oversight
  - CAP/PI&R
  - Plan of the Day Meetings
  - Work Activities
- NRC inspection of programs for maintaining ITAAC closure
  - NRC inspection reports publicly available

Pre-Fuel Load ITAAC Status

- As-built condition of plant has been verified through ITAAC closure to meet the requirements of COL
- All ITAAC determinations are being maintained
- Commission can make the Section 52.103(g) ITAAC finding although a limited number of well-understood components may be out for maintenance
  - Licensees to inform NRC re: operability status and plant condition prior to fuel load
  - Technical Specifications govern after ITAAC finding
  - Consistent with current practice at operating plants