

Maintaining ITAAC Determinations

NRC Public Meeting
January 29, 2009

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



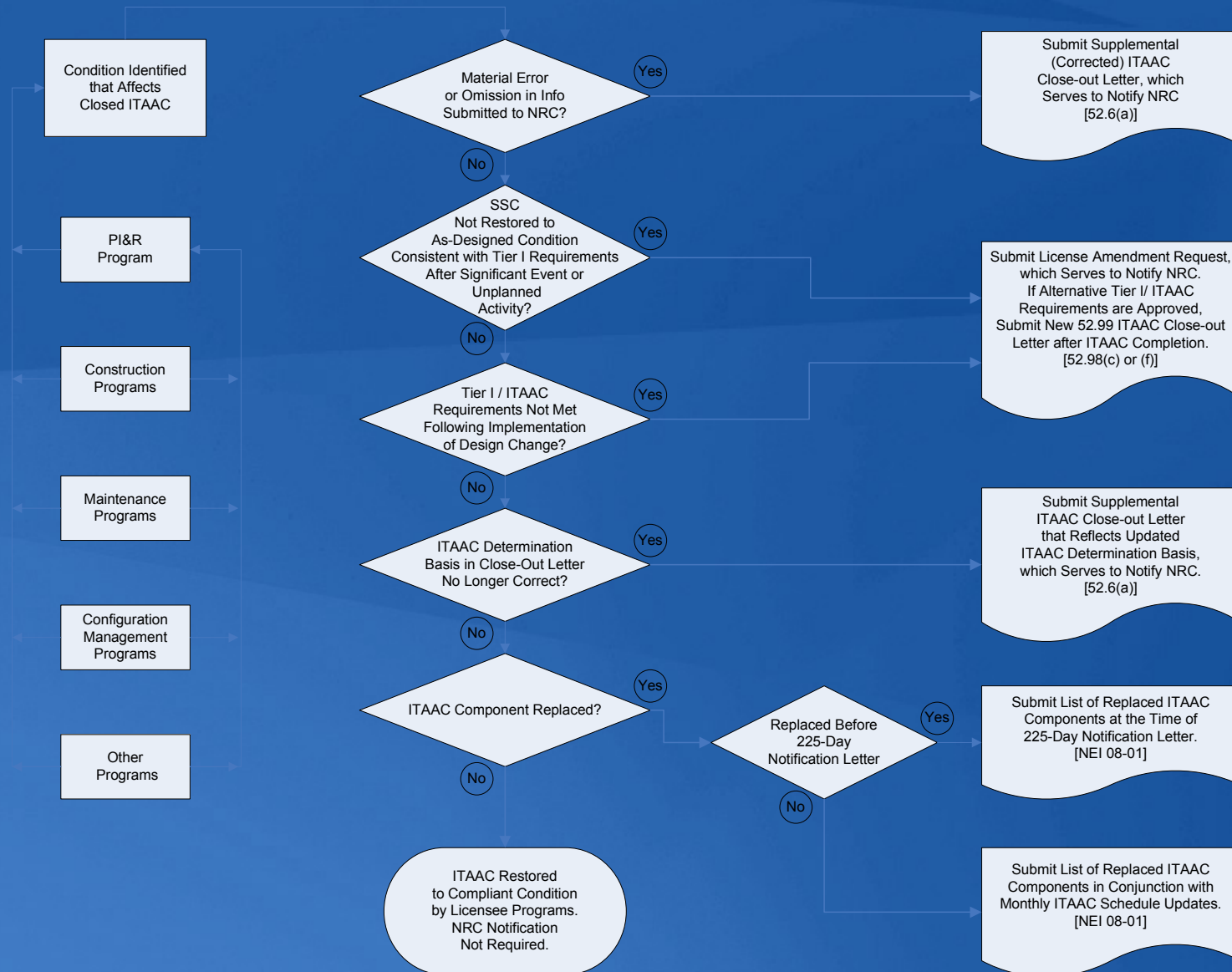
When to Make Post-ITAAC Closure Notifications to NRC

- Material error or omission
- SSCs that can't be restored to design condition
- Design change implemented that causes original Tier 1 and/or ITAAC requirements to not be met
 - License amendment required
- Licensee activities affect ITAAC determination basis described in Section 52.99(c) notifications
- Replacement of specific components identified as part of a closed ITAAC

Constant Communication with NRC Inspectors on ITAAC Maintenance

- Issues material to closed ITAAC Acceptance Criteria documented in CAP
- NRC resident oversight
 - CAP/PI&R
 - Daily meetings
 - Work Activities
- NRC inspection of programs for maintaining ITAAC closure
 - E.g., IP-XXXXX, “Licensee Program for ITAAC Closure”
 - NRC inspection reports publicly available

ITAAC Closure Maintenance



ITAAC Maintenance Issues

- Threshold for providing ITAAC Closure Status Update notifications to NRC about replacement components
- Target ITAAC
- Notification Process
- “All-done” letter
- Section 52.103(g) Finding

Notification Threshold

- Component ITAAC
 - Tested components specifically identified in ITAAC
 - Pumps, valves, Class 1E equipment, etc.
 - EQ equipment
 - ASME welds & piping
- Notify NRC by letter when whole components (pumps, valves, etc.) identified and verified by ITAAC are replaced
- Component threshold is consistent with the intent and structure (level of detail) of ITAAC

Not Included in ITAAC Closure Update Notifications on Replacement Components

- Some ITAAC verify Tier 1 design attributes
 - E.g., electrical separation, fire barriers, min/max room sizes, HFE, functional arrangement
- Conformance with such Tier 1 design requirements is generally not subject to change
 - Maintained by licensee design, configuration and associated programs
 - Licensee programs subject to NRC inspection
 - Prior NRC approval required to depart from Tier 1 design requirements

Target ITAAC

- Upon receipt of a new or supplemental 52.99 ITAAC close-out letter or an ITAAC Closure Update Notification, the NRC staff is expected to determine whether the affected SSCs were the subject of target ITAAC inspections, and if so, whether to perform any additional inspection activities.

Notification Process

- Provide ITAAC Closure Status Update notifications about replacement components:
 - At time of 225-day notice on uncompleted ITAAC
 - Thereafter in connection with monthly required ITAAC completion schedule updates
- Other notifications (e.g., corrected or supplemental ITAAC close-out letters) provided throughout construction

“All Done” Letter

- Follows or coincident with last 52.99(c)(1) ITAAC close-out letter
- States all ITAAC have been completed and are being maintained; all close-out letters submitted
- States that the plant is ready to receive the Section 52.103(g) finding
- Requests that the NRC staff make a recommendation to the Commission to make the ITAAC finding and, subject to satisfaction of all applicable technical specifications, authorize the initial loading of fuel into the core

Section 52.103(g) Finding

- NRC can make the Section 52.103(g) ITAAC finding although a limited number of well-understood components may be out for maintenance
 - “All-done letter” affirms all ITAAC complete/maintained
 - Out-of-service ITAAC components tracked via Corrective Action Program
 - NRC staff makes recommendation to the Commission concerning ITAAC completion
- Technical Specifications govern after ITAAC finding

Path Forward

- Provide supplement to NEI 08-01, Section 8, on ITAAC Maintenance for NRC review
- Hold Category 2 meeting to discuss and reach common understanding
- Revise and re-submit NEI 08-01