

Proposed Supplemental Guidance On Maintaining ITAAC Closure for
Section 8 of NEI 08-01
Revised 3/9/09

Maintaining ITAAC Conclusions

1. Following submittal of ITAAC closure letters required by 52.99(c)(1), licensees will use established programs (e.g., quality assurance, maintenance, problem identification and resolution, and configuration management programs) to maintain the validity of prior ITAAC determinations until the time all ITAAC are met and the Commission makes its Section 52.103(g) ITAAC finding. Each of these programs is subject to NRC inspection, and the NRC staff may assess the licensee's maintenance of ITAAC conclusions as one element of these inspections. NRC inspectors may also assess the licensee's maintenance of ITAAC conclusions as part of inspections under IP-XXXXX, Licensee Program for ITAAC Closure. Provided licensee programs restore SSCs to their ITAAC compliant condition following maintenance, prior ITAAC conclusions are considered to be maintained. Licensees will use these same or similar programs to maintain plant SSCs after the Section 52.103(g) ITAAC finding is made and for the life of the plant.
2. Existing NRC regulations require that information licensees provide to the Commission be complete and accurate in all material respects. Licensees should submit a new or supplemental Section 52.99 ITAAC close-out letter, as appropriate, when:
 - a. There is a material error or omission in information within the meaning of 10 CFR 52.6(a) submitted to the NRC, including the ITAAC determination bases described in Section 52.99 ITAAC close-out letters. A supplemental ITAAC close-out letter would serve as formal NRC notification. [10 CFR 52.6(a).]
 - b. Following a significant event or unplanned activity, SSCs are not restored to their pre-work, as-designed condition, consistent with Tier 1/ITAAC requirements. In this case, a license amendment request may be necessary and would serve as the formal NRC notification. [10 CFR 52.98(c).] If alternative Tier 1/ITAAC requirements are approved, the licensee would submit a new ITAAC close-out letter in accordance with Section 52.99 after the ITAAC is completed.
 - c. A design change is implemented that causes original Tier 1 and/or ITAAC requirements to no longer be met. A license amendment request may be necessary and would serve as the formal NRC notification. [10 CFR 52.98(f).] If new Tier 1/ITAAC requirements are approved in connection with the design change, the licensee would submit a new ITAAC close-out letter in accordance with Section 52.99 after the ITAAC is completed.
 - d. Licensee activities affect the ITAAC determination basis described in the Section 52.99 ITAAC close-out letter such that it is no longer accurate. A supplemental

ITAAC close-out letter that reflects the updated ITAAC determination bases would serve as the formal NRC notification. [10 CFR 52.6]

3. In addition, licensees should update NRC regarding ITAAC closure status if components specifically identified and verified as part of a closed ITAAC acceptance criterion are replaced. Provided the work performed restores the component(s) to its as-designed, ITAAC-compliant condition, no supplemental ITAAC close-out letter in accordance with Section 52.99(c)(1) is needed. The ITAAC Closure Update Notification regarding replaced ITAAC components may be provided in connection with the notice required under Section 52.99(c)(2) at least 225 days prior to scheduled fuel load concerning uncompleted ITAAC (same or separate coincident letter).

Thereafter, further ITAAC Closure Update Notifications (if any) may be provided in connection with monthly ITAAC completion schedule updates required by Section 52.99(a).

Outline for ITAAC Closure Update Notification regarding replaced ITAAC components:

- In the course of maintaining components following ITAAC closure, the following components identified and verified as part of ITAAC were replaced:
 - X
 - Y
 - Z
 - These components are associated with the following closed ITAAC (provide references to 52.99(c)(1) letters). This information may be provided in a table that relates replaced components, associated ITAAC, and 52.99(c)(1) letters.
 - These components were replaced in accordance with approved plant procedures, manufacture recommendations and applicable codes and standards, including appropriate post work testing to assure that applicable Tier 1/ITAAC requirements continue to be met
 - ITAAC closure packages maintained on site have been updated to reflect the component replacements. Specific maintenance records are also available for NRC inspection
 - Based on the information above concerning maintenance of ITAAC closure, prior ITAAC conclusions in the referenced 52.99(c)(1) letters remain valid.
4. The determination of whether a new or supplemental ITAAC closure letter should be submitted depends on whether the prior ITAAC closure letter remains valid and accurate. In the situations described in item 2, above, the purpose of a new or supplemental ITAAC closure letter is to update information in the prior letter that is no longer applicable or

accurate. In the case of a like-for-like replacement of a component verified by ITAAC (item 3 above), no supplemental ITAAC closure letter would be provided because the ITAAC determination bases are unaffected, and the prior ITAAC conclusion is maintained.

5. Following component replacement or other maintenance activity, post work testing (PWT) is performed in accordance with approved plant procedures, manufacturer recommendations and applicable codes and standards. Licensees should ensure that PWT demonstrates the work was performed properly and applicable ITAAC acceptance criteria continue to be met. If PWT differs from the specified ITAAC acceptance criteria, an engineering justification should be documented that provides the basis for the conclusion that ITAAC acceptance criteria continue to be met.
6. Upon receipt of a new or supplemental 52.99 ITAAC close-out letter (Item 2, above) or an ITAAC Closure Update Notification (Item 3, above), the NRC staff may determine whether the affected SSCs were the subject of target ITAAC inspections, and if so, decide whether to perform any additional inspection activities.
7. Many ITAAC do not identify specific components to be verified. Such ITAAC include electrical separation, containment integrated leak rate, existence of fire barriers, flooding protection, min/max room volumes, human factors, functional arrangement, and other design issues. Closure of these ITAAC is maintained through approved licensee design, configuration, and other programs that are subject to NRC inspection. Conformance with such Tier 1 design requirements is typically not subject to change; in any event, plant changes affecting these design attributes would be identified to NRC in accordance with the Part 52 change process. Prior NRC approval is required for any change that does not meet Tier 1/ITAAC requirements. [Section 52.98(c),(f)]
8. In addition to notifications in the situations identified above, NRC Resident Inspectors will be informed of activities affecting closed ITAAC, including target ITAAC, through routine and daily interactions with licensee personnel concerning corrective action program (CAP) items and design changes. The status of CAP items may be accessed directly by NRC inspectors. Conditions that are material to a closed ITAAC are specifically flagged in the CAP.
9. Except for replacement of components identified and verified as part of ITAAC, NRC would not be formally notified of preventive and corrective maintenance where components are restored to their as-designed, ITAAC compliant condition. These activities will be performed under approved licensee programs, documented, and subject to NRC inspection.

10. Licensees should update their ITAAC Closure Packages to reflect: 1) a supplemental or new ITAAC close-out letter submitted to NRC; 2) replacement of ITAAC-verified components identified to NRC; and 3) updates to documents referenced in the ITAAC close-out letter. Information on other activities affecting ITAAC SSCs (e.g., maintenance) should be documented in maintenance or other QA records in accordance with licensee procedures and available for NRC inspection.

Pre-Fuel Load ITAAC Closure Status to Support the Section 52.103(g) ITAAC Finding – “All Done Letter”

- Prior to the Commission’s Section 52.103(g) ITAAC finding that the ITAAC acceptance criteria in the COL are met, licensees must have completed all ITAAC, submitted all required Section 52.99(c)(1) notifications, and must be maintaining all ITAAC conclusions.
- As the scheduled date for fuel load nears and following completion of the last ITAAC, licensees should provide an “all done” letter to NRC stating that all ITAAC have been completed and that all ITAAC conclusions are being maintained. While not required by Part 52, the purpose of this letter is to facilitate the staff’s recommendation to the Commission concerning the completed status of all ITAAC in support of the Section 52.103(g) ITAAC finding.
- Maintenance activities may be in progress on a limited number of ITAAC components at the time of the Section 52.103(g) ITAAC finding. The state of being out-of-service pending restoration in accordance with licensee programs and procedures does not invalidate prior ITAAC conclusions; all ITAAC continue to be met, and prior ITAAC conclusions continue to be maintained. Components out for corrective maintenance will be tracked via the Corrective Action Program. Thus we expect that the NRC can make the 52.103(g) ITAAC finding despite the presence of a limited number of well understood out-of-service components. Doing so would have no impact on public health and safety because licensees may not load fuel until all applicable Technical Specification operability requirements are satisfied. The Technical Specifications take full effect at the time the 52.103(g) ITAAC finding is made.

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