

**Proposed Supplemental Guidance On Maintaining ITAAC Closure for
Section 8 of NEI 08-01 Revised 4/27/09**

Maintaining ITAAC Conclusions

Scope:

Following submittal of ITAAC Closure Letters required by 10 CFR 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 conclusions until the time all ITAAC are met and the Commission makes its 10 CFR 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 remain valid. Licensees will use these same or similar programs to maintain plant SSCs for the life of the plant after the 10 CFR 52.103(g) ITAAC finding is made.

Purpose:

Describe generic process elements related to maintaining the validity of ITAAC conclusions.

Definitions:

Condition – The existence, occurrence, or observation of a situation that requires further review, evaluation, or action for resolution (The definition is from NEI 08-02.)

ITAAC Closure Package – refers to the information and records documenting the work performed to verify and close an ITAAC. Once completed, the ITAAC closure package will be available for NRC inspection at the plant site. (Definition from NEI 08-01, Section 2)

ITAAC Determination Basis – Information provided in the ITAAC Closure Letter that summarizes the methodology for conducting the ITA, and the results that demonstrate the acceptance criteria were met. (Definition based on NEI 08-01, Appendix D-1)

Supplemental ITAAC Closure Letter – An addendum to the original ITAAC Closure Letter from the licensee to the NRC detailing material changes that were required and why those changes were made. (new definition)

ITAAC Component Replacement Summary Letter – A letter from the licensee to the NRC that provides a status update for the closed ITAAC(s) that are affected by the replacement of a component(s), as specifically delineated in the ITAAC(s). (new definition)

All Done Letter – A letter from the licensee to the NRC stating that all inspections, tests, and analyses have been performed; all acceptance criteria have been met; and all ITAAC conclusions are being maintained. (new definition)

Process Guidance :

1. Licensee programs, procedures and training should assure that conditions material to ITAAC conclusions are recognized and entered into the Problem Identification and Resolution Program
2. Certain conditions could require the Licensee to submit an amendment request which would serve to notify the NRC of a change in the Tier 1 ITAAC requirements.
 - a. If following a significant event or unplanned activity, SSCs are not restored to their pre-work, as-designed condition, consistent with Tier 1/ITAAC requirements, a license amendment request may be necessary.
 - b. If a proposed design change would cause original Tier 1/ITAAC requirements to no longer be met, a license amendment request may be necessary. [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 Closure Letter in accordance with Section 52.99.
3. Licensees should supplement a previously submitted ITAAC Closure Letter in the following situations:
 - a. If the licensee discovers a material error or omission in an ITAAC Closure Letter, then the licensee should submit a Supplemental ITAAC Closure Letter that corrects the material error or omission.
 - b. If licensee activities alter statements made in the ITAAC Determination Basis described in the original ITAAC Closure Letter, licensees should submit a Supplemental ITAAC Closure Letter. For example, a plant change could affect the ITAAC Determination Basis if the change results in a new report that replaces a report referenced in the original ITAAC Determination Basis. In such situations, a Supplemental ITAAC Closure Letter would be submitted that identifies the new report.

The Supplemental ITAAC Closure Letter should list what changed, why the change occurred and a description of why closure of the ITAAC remains valid.

4. Like-for-like replacement of components specifically identified and verified as part of a closed ITAAC acceptance criterion in accordance with approved procedures does not change the validity of the original ITAAC closure letter. As such, a Supplemental ITAAC Closure Letter is not submitted in the case of like-for-like replacement of ITAAC-specified components. However, for process transparency, licensees should notify the NRC by letter when such ITAAC-specified components are replaced. The ITAAC Component Replacement Summary Letter regarding replaced ITAAC components should be provided to the NRC one year prior to fuel load with an update every 30 days thereafter. The timing of these letters is based on the expected schedule for ITAAC completion and submission of ITAAC Closure Letters to the NRC. It is important to recognize that a single component replacement may affect multiple ITAAC.

Outline for ITAAC Component Replacement Summary Letter:

- In the course of maintaining components following the submittal of ITAAC Closure Letter(s), the following components identified and verified as part of ITAAC were replaced:
 - o X
 - o Y
 - o Z
- These components are associated with the following closed ITAAC (provide references to 10 CFR 52.99(c)(1) ITAAC Closure Letters).

Note: This information may be provided in a table that relates replaced components, associated ITAAC, and ITAAC Closure Letters.

- These components were replaced in accordance with approved plant procedures, manufacturer recommendations and applicable codes and standards, including appropriate postwork testing (PWT) 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 conclusions and ITAAC Determination Bases in the referenced ITAAC Closure Letters remain valid.

Additional Guidance:

5. The determination of whether a new or supplemental ITAAC Closure Letter should be submitted depends on whether the previously submitted ITAAC Closure Letter remains valid and accurate. In the situations described 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. As discussed in Item 4 of the Process Guidance above, no Supplemental ITAAC Closure Letter would be provided in the case of a like-for-like replacement of an ITAAC-specified component, because the ITAAC Determination Bases are unaffected, and the prior ITAAC closure is maintained.
6. Following component replacement or other maintenance activity, 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. In some cases, it may not be practical for PWT to reflect the system line-up or other aspect of the original ITAAC; or, PWT based on the original ITAAC may conflict with the ASME Code or other applicable Code or Standard. If PWT differs from the original ITAAC, an

engineering justification should be documented in the on-site ITAAC Closure Package that provides the basis for the conclusion that ITAAC acceptance criteria continue to be met.

7. Upon receipt of a new or supplemental ITAAC Closure Letter or an ITAAC Component Replacement Summary Letter, the NRC staff may determine whether the affected SSCs were the subject of target ITAAC inspections, and if so, decide whether to perform additional inspection activities.
8. Some 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. [10 CFR 52.98(c),(f)]
9. In addition to notifications described above, NRC Resident Inspectors would maintain cognizance of activities affecting closed ITAAC (including target ITAAC) through routine interactions with licensee personnel concerning problem identification and resolution (PI&R) items and design changes. Conditions that are material to a closed ITAAC are specifically identified in the PI&R process.
10. Except for the replacement of components specifically identified and verified as part of closed ITAAC acceptance criteria, 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.
11. Licensees should supplement their ITAAC Closure Packages to reflect:
 - A new or supplemental ITAAC Closure Letter submitted to the NRC
 - Replacement of ITAAC-verified components identified to the NRC
 - Updates to documents referenced in the ITAAC Closure Letter.
 - Supplemental information regarding PWT – As discussed in Item 6, above, if PWT differs from the original ITAAC, the ITAAC Closure Package should be supplemented with an engineering justification that provides the basis for the conclusion that ITAAC acceptance criteria continue to be met.

The information in ITAAC Closure Packages will be available for NRC inspection at the plant site.

Pre-Fuel Load ITAAC Closure Status to Support the 10 CFR 52.103(g) ITAAC Finding – “All Done Letter”

1. Prior to the Commission’s 10 CFR 52.103(g) ITAAC finding that the ITAAC acceptance criteria in the COL are met, licensees must have completed all ITAAC, submitted all required 10 CFR 52.99(c)(1) notifications, and must be maintaining all ITAAC conclusions.
2. Following completion of the last ITAAC, licensees should provide an “All Done” letter to the NRC. While not required by 10 CFR 52, the purpose of this letter is to confirm that all ITAAC have been performed, all acceptance criteria have been met, and all ITAAC conclusions are being maintained. The letter is also intended to facilitate the Staff’s recommendation to the Commission concerning the completed status of all ITAAC in support of the 10 CFR 52.103(g) ITAAC finding.
3. Maintenance activities may be in progress on a limited number of ITAAC components at the time of the 10 CFR 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; these ITAAC continue to be met. Components out of service for corrective maintenance will be tracked via the PI&R process. Thus, the NRC can make the 10 CFR 52.103(g) ITAAC finding despite 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 10 CFR 52.103(g) ITAAC finding is made.