

June 3, 2009

MEMORANDUM TO: Mark Kowal, Chief
Technical Specifications and ITAAC Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

FROM: James Gaslevic, Reactor Operations Engineer /RA/
Technical Specifications and ITAAC Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

PARTICIPANTS: Public, Industry, and NRC Staff

SUBJECT: SUMMARY OF MAY 7, 2009, CATEGORY 2 MEETING WITH
THE NUCLEAR ENERGY INSTITUTE (NEI) TO CONTINUE
DISCUSSIONS ON ITAAC MAINTENANCE AND PROVIDE AN
UPDATE TO NEI ON THE NRC ASSESSMENT PROGRAM
COMMISSION PAPER

On May 7, 2009, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting with the Nuclear Energy Institute (NEI) to discuss inspections, tests, analyses and acceptance criteria (ITAAC) maintenance and provide an update of the NRC's assessment program Commission paper. Industry and the general public were also invited to attend. NRC attendance included staff from the Technical Specifications and ITAAC Branch, and the Construction Inspection and Allegation Branch, of the Division of Construction Inspection and Operational Programs (DCIP) in the Office of New Reactors (NRO), and also the NRC Region II Center for Construction Inspection. The meeting was held at the Legacy Hotel in Rockville, Maryland.

The meeting was a roundtable-type discussion between the NRC and NEI regarding the development of ITAAC maintenance procedures and industry understanding of reporting expectations. The NRC provided handouts of slides to identify the purpose, goal, and discussion topics for the meeting (ADAMS ML091250288). Since the meeting was designated as a Category 2 public meeting, staff announced that there would be specific times allotted for public participation as outlined in the meeting agenda. The NEI handout, "Proposed Supplemental Guidance on Maintaining ITAAC Closure for Section 8 of NEI 08-01 Revised 4/27/09" (ADAMS ML091240094) was also discussed. NEI included two other documents "Revised Draft ITAAC Maintenance Examples for Discussion w/NRC on May 7, 2009" (ADAMS ML091250330) and "Maintaining ITAAC Closure Flowchart Rev 7" (ADAMS ML090780173), as handouts for the meeting.

CONTACTS: James Gaslevic, DCIP/CTSB
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Mahmoud Jardaneh, DCIP/CTSB
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As part of the opening remarks, the NRC updated NEI and industry representatives of the internal reorganization that transferred the ITAAC Closure Team from the Construction Inspection and Allegations Branch to the Technical Specifications and ITAAC Branch.

Post-work testing was the first topic in roundtable discussion, and focused on the issue that once an ITAAC is successfully closed, the licensee needs to maintain the validity of its closure. These discussions focused on the following concepts:

- Previously closed ITAAC will be maintained through the licensee's use of its established programs (e.g. quality assurance, maintenance, problem identification and resolution (PI&R), and configuration management programs).
- Confidence needs to be established that the ITAAC remains valid based on the ITAAC maintenance programs.
- Post-work testing of components included in ITAAC should be as close as possible to the original inspections, tests, and analyses.
- The further the testing strays from the original ITAAC, the more justification a licensee will need to detail its post-work testing.

The NRC then presented its review of the NEI submittal, "Proposed Supplemental Guidance on Maintaining ITAAC Closure for Section 8 of NEI 08-01 revised 4/27/09." The NRC informed NEI that licensees will need to have ITAAC maintenance program established before the first ITAAC is closed, and preferably by the time limited work authorizations would be issued. It was also requested that guidance documents NEI 08-01 and NEI 08-02 should be consistent regarding ITAAC maintenance and problem tracking issues. The NRC identified three important reasons for requiring notifications on ITAAC maintenance: to inform the resident inspector of the activity, to provide objective evidence to the Commission that the ITAAC has been successfully maintained, and to provide the public with accessible information on the ITAAC.

The NRC briefed stakeholders on the progress in responding to the Commission's SRM, dated December 5, 2008, that directed the staff to reconsider the construction assessment process as presented in IMC 2505. The staff provided an overview of prior public meetings on this topic and the resulting four options that will be presented in a Commission paper in August. The staff emphasized that the four options were in draft form and were being refined to reflect recent feedback. The NRC committed to providing a more detailed update at the May 14, 2009, category 3 public meeting.

No members of the public attended the meeting and no Public Meeting Feedback Forms were received. Please direct any inquiries to James Gaslevic at 301-415-2776 (james.gaslevic@nrc.gov) or Mahmoud Jardaneh at 301-415-2753 (mahmoud.jardaneh@nrc.gov).

Enclosure 1: Agenda (ADAMS Accession Number: ML091250318)

Enclosure 2: Meeting Attendees List

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NRC-001

OFFICE	NRO/DCIP/CTSB	NRO/DCIP/CTSB	NRO/DCIP/CTSB:BC
NAME	M. Jardaneh	J. Gaslevic	M. Kowal
DATE	6/2/2009	6/2/2009	6/3/2009

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AGENDA FOR May 7, 2009
ITAAC Maintenance Workshop

8:00 a.m. – 8:10 a.m. Opening Remarks

- Provide roundtable discussions to come to conclusions on remaining ITAAC maintenance process items
- Goal is to finalize key policy issues on ITAAC maintenance and notifications

8:10 a.m. – 9:20 a.m. Discussions on ITAAC Maintenance

- Organizational update
- Post-Work Testing
- Industry's QA program approach
- ITAAC maintenance program provisions
- Finalize reporting thresholds

9:20 a.m. – 9:35 a.m. Public Participation

9:35 a.m. – 9:50 a.m. Break

9:50 a.m. – 11:00 a.m. Review and discuss NEI 08-01 supplemental text on ITAAC maintenance

- Process Guidance
- Outline for ITAAC Component Replacement Summary Letter
- Pre-Fuel Load ITAAC Closure Status “All Done Letter”

11:00 a.m. – 11:15 a.m. Public Participation

11:15 a.m. – 12:15 p.m. Status of Construction Assessment Program Commission Paper

12:15 p.m. – 12:30 p.m. Closing Remarks

**ITAAC Maintenance Public Workshop,
May 7, 2009
The Legacy Hotel, Rockville, MD
Meeting Attendees**

Gary Waldrep	Exelon
Matthew Williams	Unistar
Steve Blossom	STPNOC
Andy Campbell	NRC
James Gaslevic	NRC/NRO
Thomas Esselman	LPI
Kimberly Keithline	NEI
David Postma	Bechtel Power
Mahmoud Jardaneh	NRC
George Zinke	Entergy
Joelle Starefos	NRC/NRO
Guy Davant	Entergy
Tony Cerner	NRC
Ron Gardner	NRC
Junichi Uchiyama	Mitsubishi Nuclear Energy Systems
Russ Bell	NEI
John Oddo	Shaw Group Inc.
Lansing Dusek	Fluor
Jim Kinard	AREAVA NP
Caroline Schlaseman	MPR Associates/TANE
Roger Lanksbury	NRC/RII
Thom Ray	Westinghouse
Ken Barry	EPRI
Hamer Carter	Progress Energy
Doug Walters	NEI
Glenn Tracy	NRC/NRO
John Tappert	NRC/NRO
Charles Ogle	NRC/RII
Alan Blamey	NRC/RII
Nanette Gilles	NRC
Barry Bryant	Dominion
Branden Waites	Southern Company
Robert Weisman	NRC/OGC
Tomas Herrera	NRC/NRO
Michael Spencer	NRC
Tim Durkin	Energetics
David Hastie	Shaw Group
Omid Tabatabai	NRC/NRO
Anne Cottingham	NEI
Kimberly Corp	NRC
Denise McGovern	NRC
Eddie Grant	NuStart
Steven Downey	NRC
George Georgiev	NRC
Patricia Campbell	GE Hitachi

Jin Chung	MNES
Richard Stark	DOE
Chuck Wade	DOE
Carl Schulten	NRC
Tom Houghton	NEI
Weijun Wang	NRC
David Terao	NRC/NRO
Donna Sinks	NRC/NRO
Thomas Bearden	MNES
Jonathan Rund	Morgan Lewis
Eric Oesterle	NRC/NRO
Thomas Kozak	NRC/NRO
Robert Pascarelli	NRC/NRO
Patrick Boyle	NRC/NRO
John Nakoski	NRC/NRO
Juan Peralta	NRC/NRO
Robert Lukes	NRC/NRO
Jim Fiscaro	NEI
Pat Shepherd	Exelon