

Industry Comments on DG-1204, Guidance for ITAAC Closure

DG Section/ Paragraph/Sentence	Comment	Proposed Resolution
<p>B.1 Development of Industry Guideline Document NEI 08-01</p> <p>Second paragraph, bottom of page 2</p> <p>“ITAAC closure letters must be submitted for all ITAAC.”</p>	<p>Clarify that ITAAC closure letters will be submitted for all ITAAC identified in the COL.</p>	<p>Revise the referenced sentence as follows:</p> <p>“ITAAC closure letters must be submitted for all ITAAC for which the NRC has not made a finding that the acceptance criteria have been met in accordance with 10 CFR 52.97(2).”</p>
<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Third paragraph, middle of page 4.</p> <p>“Section 2 of NEI 08-01 provides a list of definitions for terminology used in the guide. Some of these definitions will reappear in other documents such as operating license applications, design certification applications, and other supporting documents. Therefore, it is important that the full meaning of the definition be preserved.”</p>	<p>The last sentence could be interpreted as incorporating explanatory information in Section 3.1.4 into the definition of “as-built.” Section 3.1.4 is not part of the definition but rather provides supporting information for how licensees will need to close some of the ITAACs.</p> <p>While suitable as guidance, the language in Section 3.1.4, e.g., “where ... inspection or test is <i>impractical</i> after installation,” is not appropriate to include in the definition of “as-built.”</p> <p>Therefore, the third sentence should be deleted.</p> <p>In the second sentence, “operating license applications” should be replaced by “combined license applications.”</p>	<p>Delete the last sentence of the referenced paragraph so it reads as follows:</p> <p>“Section 2 of NEI 08-01 provides a list of definitions for terminology used in the guide. Some of these definitions will reappear in other documents such as <u>combined</u> license applications, design certification applications, and other supporting documents.”</p> <p>Alternatively, revise the last sentence as follows:</p> <p>“To better convey the meaning of the term ‘as-built’, Section 3.1.4 of NEI 08-01 provides further explanation of the intent of the definition as identified below.”</p>

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<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Fourth paragraph, bottom of page 4, top of page 5.</p> <p>“The additional information included in Section 3.1.4 of NEI 08-01 places a restraint on the use of other than final in-place inspections used to satisfy the prescribed inspections, tests, and analyses for ITAAC closure. The intent of the additional language in Section 3.1.4 is to limit the use of those DG-1204, Page 5 inspections to instances when the final in-place inspection is impractical. An acceptable example could be the use of a record of inspection of an interior diameter measurement before final assembly of a valve completed at a vendor location. Every effort should be made by the licensee to complete the prescribed inspections, tests, and analyses in the SSCs at the final constructed location, or “as-built.”</p>	<p>The phrasing “every effort should be made” is vague and subject to interpretation. This paragraph should be revised to be consistent with the acknowledgement that there may be some cases where final, in-place inspections are impractical.</p>	<p>Replace the fourth paragraph with:</p> <p>“Inspections, tests, and analyses of ITAAC SSCs should be performed in the as-built condition. Section 3.1.4 of NEI 08-01 acknowledges that it may be impractical to perform some inspections and testing after installation in the plant. In those cases, it may be appropriate to perform inspections or tests prior to final installation (e.g., measuring an interior dimension prior to final assembly of a valve).”</p>

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<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Sixth paragraph, middle of page 5.</p> <p>“The NRC will consider any licensee claims that the submitted schedule is proprietary and should be withheld from public release under the Freedom of Information Act and 10 CFR 2.390 (Ref. 15).”</p>	<p>NRC should reference SECY 06-0114, which documents the commission’s agreement to use a single proprietary determination for the construction schedule and its updates, over the entire life of the construction project.</p>	<p>Revise the referenced sentence as follows:</p> <p>“As described in SECY 06-0114, the NRC will consider any licensee claims that the submitted schedule is proprietary and should be withheld from public release under the Freedom of Information Act and 10 CFR 2.390 (Ref. 15).”</p>
<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Ninth paragraph, bottom of page 5.</p> <p>“The NRC expects that the notification of ITAAC completion to contain more information than just a simple statement that the licensee believes that it has completed the ITAAC and has met the acceptance criteria.”</p>	<p>This sentence could be stated more strongly.</p>	<p>Revise the referenced sentence as follows:</p> <p>“The NRC expects the notification of ITAAC completion to contain more information than just a simple statement that the licensee has completed the ITAAC and has met the acceptance criteria.”</p>

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<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Tenth paragraph, top of page 6.</p> <p>“Each inspection, test, or analysis should be detailed to clearly indicate how and when it was completed and should state its results.”</p>	<p>It is not necessary to specify when each inspection, test, or analysis was completed.</p>	<p>Revise the referenced sentence as follows:</p> <p>“Each inspection, test, or analysis should be detailed to clearly indicate how it was completed and should state its results.”</p>
<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Thirteenth paragraph, bottom of page 6.</p> <p>“Each inspection, test, or analysis for both completed and uncompleted portions should be detailed to clearly indicate how and when it was, or will be, completed.”</p>	<p>It is not necessary to specify when each inspection, test, or analysis was or will be completed.</p>	<p>Revise the referenced sentence as follows:</p> <p>“Each inspection, test, or analysis for both completed and uncompleted portions should be detailed to clearly indicate how it was, or will be, completed.”</p>

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<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Fourteenth paragraph, top of page 7.</p> <p>“The NRC staff position is that the licensee must satisfy all of the acceptance criteria for all ITAAC at the time that the 10 CFR 52.103(g) finding is made.”</p>	<p>This statement is understood to be a restatement of NRC regulations on this point. As such, the RG should restate Section 103(g) (as was done in NEI 08-01, Section 3.1), rather than characterize this requirement as a staff position using language that may be subject to a different interpretation. Clarification and guidance on the meaning of Section 52.103(g) is the subject of ongoing discussion. Embellishment or interpretation of the regulation in this RG would be premature.</p>	<p>Revise the referenced sentence as follows:</p> <p>“Section 52.103(g) states, “The licensee shall not operate the facility until the Commission makes a finding that the acceptance criteria in the combined license are met.”</p>
<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Top of page 8.</p> <p>“The staff considers these letters to be examples and anticipates that additional information may be necessary for individual ITAAC letters.”</p>	<p>This sentence is too open-ended with respect to what “additional information may be necessary” in individual ITAAC closeout letters.</p>	<p>Revise the referenced sentence as follows:</p> <p>“The staff considers these letters to be examples and anticipates that <u>differing or additional information, consistent with Section 6 of NEI 08-01 (Guidance on Sufficient Information for ITAAC Closure Letters)</u>, may be necessary for individual ITAAC letters.”</p>

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<p>B.2. Guidelines on ITAAC Closure Development and Documentation in NEI 08-01</p> <p>Sixteenth paragraph, middle of page 7.</p> <p>“Three scenarios exist for the closure of design acceptance criteria, namely, closure through the amendment of the design certification rule, closure through the COL application review process, and closure after COL issuance. The NRC staff prefers closure through the amendment of the design certification rule and closure through the COL application review process, as ways to satisfy and close out the acceptance criteria for those design characteristics because these two scenarios would be completed before construction begins. The staff does not prefer closure after COL issuance, because the closeout of the acceptance criteria could be delayed until the end of plant construction.”</p>	<p>The last sentence presumes a worst case timing for DAC closeout without basis. This sentence is unnecessary anyway because the staff’s preference is clear without it.</p>	<p>Delete the last sentence. Alternatively, revise it to read, “because the closeout of the acceptance criteria could be delayed until during plant construction.”</p>

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<p>C. REGULATORY POSITION</p> <p>4. Guidance for Site-Specific ITAAC</p> <p>"If necessary, the staff may provide further guidance or examples for use with respect to such site-specific attributes and characteristics at a later date."</p>	<p>The staff may always provide further guidance at a later date, so this sentence is unnecessary. Retaining it would raise questions about why additional guidance would be needed in light of there being no difference from an ITAAC closure perspective between design certification and plant-specific ITAAC.</p>	<p>Delete the sentence</p>