



U.S. NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

ITAAC Maintenance Workshop

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Agenda

- Results of May 14th meeting (NRC)
- Status of Regulatory Guide 1.215 (NRC)
- Attributes of Programs Used to Maintain ITAAC Conclusions (All)
- Transitioning from ASME Code Section III to XI (NRC)
- Discussion on ITAAC Maintenance (All)



Results from the May 14th Meeting

- NEI presented draft attributes to be included in programs credited with maintaining ITAAC
- Discussed supplemental notification threshold
- Introduced Draft ITAAC 'Are Met' concept



Status of Reg. Guide 1.215

- RG 1.215 will be reviewed at an ACRS meeting in July
- Scheduled to be sent to the Commission in August for their consideration



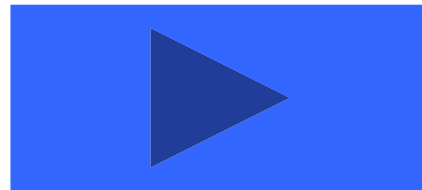
Attributes of Programs Used to Maintain ITAAC Conclusions

- Level of detail adequate for inclusion in NEI 08-01
- Programs should contain an appropriate level of guidance regarding ITAAC Maintenance
- Program attributes will be implemented prior to the utilization of these programs as appropriate to support ITAAC maintenance



ASME Code Section III to XI Transition

Launch Division of Engineering presentation





ITAAC 'Are Met' (DRAFT)

ITAAC 'are met' if the following conditions hold:

1. ITAAC were verified to be met at one time, *and*
2. Notwithstanding some post-closure event (maintenance, malfunction, design change, etc), the NRC has confidence* that the ITAAC AC would still be met after expected replacement/repairs and post work verification (PWV).

**NRC can have confidence that ITAAC would still be met if the NRC has confidence that if the ITA were to be re-performed, the AC would be met.*



§ 52.103(g) Threshold Development

Commission Cannot Find ITAAC Are Met

————— **THRESHOLD** —————

Commission Can Find ITAAC Are Met



Threshold Development Cont.

Each ITAAC is developed and documented in tabular format using the following standard format:

Design Commitment - Inspections, Tests, & Analyses - Acceptance Criteria

The following alignment is recognized between these elements of the ITAAC and the NRC Staff's "**Draft Threshold Concepts**":

- 1 - Focuses on the significance of the ITA
- 2 - Focuses on the significance of the AC
- 3 - Focuses on the significance of the DC
- 4 - Focuses on the totality of the ITAAC being properly represented in the ITAAC Closure Letter



Draft Threshold Concept 1

When post-work verification (PWV) is not the same as the testing method described in the ITAAC closure letter, can the PWV objectively stand alone (i.e., without an equivalency evaluation to support it) as evidence that the specified acceptance criteria remain met?

Yes → Supplemental **not** required by this threshold

No → Supplemental required

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- NEI Example 5: “SLC Pump Maintenance” (Supplemental Not Required)
 - Ex. 5 Modified: “Replace Suction MOV” (Supplemental Required)



Draft Threshold Concept 2

Has an engineering change been implemented to specifically address a condition that invalidates the acceptability of the affected SSC which is related to a previously closed ITAAC?

No → Supplemental **not** required by this threshold

Yes → Supplemental required

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- NRC Pipe Support Ex. (Scenario 2) (Supplemental Not Required)
 - Example modified to consider ASME support damage by water hammer (Supplemental Required)



Draft Threshold Concept 3

Has the ITAAC component population been increased (e.g., an added pipe weld), subsequent to closure notification, which results in more SSC than was applicable in the original ITAAC Closure Letter?

No → Supplemental **not** required by this threshold

Yes → Supplemental required

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- NEI ASME Piping ITAAC Maintenance Example (Supplemental Not Required)
 - Example modified to Section III controls - base metal repair requiring NDE and other follow-up (Supplemental Required)



Draft Threshold Concept 4

Does the scope of additional licensee work (e.g., repair, rework, replacement) activities warrant augmentation of the statements made in the ITAAC Determination Basis? [Such augmentation would be considered necessary if the additional work activities add new, relevant information to ensure the accuracy and completeness of the ITAAC Closure Letter.]

No → Supplemental **not** required by this threshold

Yes → Supplemental required

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- NRC MOV Example (Scenario 3.a) (Supplemental Not Required)
 - NRC MOV Example (Scenario 3.b) (Supplemental Required)



Meeting Wrap-up

- Questions?
- Comments?
- Discussion?



List of Acronyms

- AC Acceptance Criteria
- ASME American Society of Mechanical Engineers
- CTSB Technical Specifications and ITAAC Branch
- DC Design Commitment
- DCIP Division of Construction Inspection & Operational Programs
- ITA Inspection, Test, Analysis
- ITAAC Inspections, Tests, Analyses, and Acceptance Criteria
- MOV Motor Operated Valve



List of Acronyms Cont.

- NDE Non-Destructive Examination
- NEI Nuclear Energy Institute
- NRC Nuclear Regulatory Commission
- NRO Office of New Reactors
- PWV Post-Work Verification
- SLC Standby Liquid Control
- SSC Structures, Systems, and Components