

June 24, 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 JUNE 11, 2009, CATEGORY 2 MEETING WITH
THE NUCLEAR ENERGY INSTITUTE (NEI) TO CONTINUE
DISCUSSIONS ON ITAAC MAINTENANCE

On June 11, 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. Industry and the general public were also invited to attend. NRC attendance included staff from the Technical Specifications and ITAAC Branch of the Division of Construction Inspection and Operational Programs (DCIP) in the Office of New Reactors (NRO), the Component, Integrity, Performance, and Testing Branch of the Division of Engineering, and NRC Region II Center for Construction Inspection. The meeting was held at the NRC headquarters 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 ML091610622). 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.

As part of the opening remarks, the NRC briefly discussed the results from the May 14th Category 3 public meeting. The NRC updated NEI and industry representatives of the status of Regulatory Guide 1.215, "Guidance for ITAAC Closure Under 10 CFR Part 52." The NRC then presented the expectations for attributes of programs to be used to maintain ITAAC conclusions.

The Division of Engineering of NRO presented "Transitioning from ASME Code Section III to Section XI." The presentation was meant to clarify staff's interpretation of the regulations regarding when it is practicable to use either section of the code. Staff's slides are available in ADAMS with accession number ML091540033.

The remainder of the meeting focused on the NRC's response to NEI presentations made during the May 14th public meeting. First, the NRC clarified what is meant by ITAAC "are met." ITAAC "are met" if the ITAAC were verified to be met at one time, and the staff has confidence that the acceptance criteria would still be met after post-work verification (PWV), notwithstanding some post closure events. The NRC staff expects to be informed if this threshold is exceeded in order to satisfy the public's right to accurate information, and also to satisfy the staff's need for reasonable assurance finding that the acceptance criteria are met.

Threshold development was further defined through the use of four concepts to be used in parallel to assess if a condition is reportable and potentially invalidates an ITAAC:

- Concept 1 - When PWV is not the same as the original ITAAC, can the PWV objectively stand alone as evidence that the specified acceptance criteria remain met?
- Concept 2 - Has an engineering change been implemented to specifically address a condition that invalidates the acceptability of the affected SSCs which is related to a previously closed ITAAC?
- Concept 3 – Has the ITAAC component population been increased (e.g., an added pipe weld), subsequent to closure notification, which results in more SSCs that were applicable in the original ITAAC closure letter?
- Concept 4 – Does the scope of additional licensee work activities warrant augmentation of the statements made in the ITAAC Determination Basis of the original ITAAC closure letter?

Due to time constraints of the afternoon session, NEI requested that a future Cat 2 meeting be scheduled to better respond to the NRC proposed methodologies and criteria for ITAAC maintenance.

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).

Enclosures 1: Attendance Sheet

CONTACT: James Gaslevic, NRO/DCIP/CTSB
301-415-2776

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NAME	J. Gaslevic	R. Laura	M. Kowal
DATE	06/18/2009	06/24/2009	06/24/2009

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**ITAAC Maintenance Public Workshop,
June 11, 2009
NRC Headquarters, Rockville, MD
Meeting Attendees**

Name	Affiliation
Paul Bessette	Morgan Lewis
Mark Kowal	NRC
Denise McGovern	NRC
James Kinard	Areva NP
Glenn Tracy	NRC
George Zinke	Entergy
Alan Torres	SCE&G
Ryder Thompson	SCE&G
B. Waites	Southern Co.
John Oddo	Shaw Group
Russ Bell	NEI
Debbie Johnson	Fluor
Lansing Dusek	Fluor
Patricia Campbell	GE Hitachi
Thomas Bearden	MNES
Deann Raleigh	Scientech, Curtiss Wright
George Georgiev	NRC
Christina Braun	Westinghouse
Thom Ray	Westinghouse
Laura Dudes	NRC
John Hayden	Dominion NA3
Chuck Ogle	NRC-CCI
Rich Laura	NRC
Joelle Starefos	NRC
Rich Stark	DOE
Danny Meurer	DOE
David Terao	NRC
Nanette Gilles	NRC
Doug Walters	NEI
David Hastie	Shaw Group
Hamer Carter	Progress Energy
Eric Oesterle	NRC
John Tappert	NRC
Andrea Johnson	NRC
Larry Arnola	STP NOC
Anthony Minarik	NRC
Michael Webb	NRC
Rick Szocit	Unistar
Matthew Williams	Unistar
James Gaslevic	NRC
Junichi Uchiyama	MNES

Enclosure

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