

December 23, 2009

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

FROM: Mahmoud Jardaneh, 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 DECEMBER 17, 2009, CATEGORY 3 PUBLIC MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) AND INTERESTED STAKEHOLDERS TO CONTINUE DISCUSSIONS ON ITAAC MAINTENANCE AND INSPECTABILITY, THE DEFINITION OF "AS-BUILT", THE USAGE OF ASME SECTION III VS. XI, AND LICENSE AMENDMENTS.

On December 17, 2009, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 3 public meeting to engage industry and interested stakeholders on continuing discussions concerning inspections, tests, analyses and acceptance criteria (ITAAC). Topics included ITAAC maintenance and inspectability, the definition of "As-Built" as it relates to ITAAC, the application of ASME Section III vs. XI during construction, and understanding when changes to ITAAC related Structures, Systems and Components (SSCs) would require license amendments. The meeting was led by the Construction ITAAC Team (CTSB/CIT) of the Division of Construction Inspection and Operational Programs (DCIP) of the Office of New Reactors (NRO), with support from the Division of New Reactors Licensing (DNRL), the Division of Engineering (DE), and the Office of Nuclear Security and Incident Response (NSIR). The meeting was held at the Hilton Hotel and Executive Meeting Center in Rockville, Maryland.

Following the introductory remarks by Mark Kowal stressing the importance of reaching consensus on key issues to support updating the industry guidance (NEI 08-01), DCIP staff presented the ITAAC maintenance draft thresholds and related situations for which a license amendment would be needed (ADAMS ML093491074). Staff and industry reached preliminary agreement on the draft threshold language, where proposed staff refinements have improved their clarity. NSIR staff followed the discussion by offering working examples of Emergency Preparedness ITAAC (ADAMS ML093491126). NEI also presented examples of post ITAAC completion activities requiring supplemental closure letters (ADAMS ML093520054). A handout

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301-415-2753

that contains two ITAAC examples from the same design center demonstrated how different ITAAC phrasing on similar topics can result in different post work verification (PWV) reporting expectations (ADAMS ML093490658). The goal is to include examples of ITAAC maintenance from various technical disciplines and regulatory areas, as well as related guidance, in the next revision of NEI 08-01, the industry guideline on ITAAC closure.

DNRL staff led a discussion on standardizing the definition of the term "As-Built" (ADAMS ML093500142). The staff was successful in reaching an initial agreement with NEI and industry on the definition's new wording. This definition and related guidance are also proposed as an inclusion to the next revision of NEI 08-01.

DCIP staff also led an instructional presentation on ITAAC inspectability and quality issues (ADAMS ML093491081) with a focus on existing design certification and combined license applications ITAAC examples. A handout illustrating examples of ITAAC and how improvements to terminology could lessen ambiguity was distributed at the meeting (ADAMS ML093431086).

DNRL staff also presented an update on the status of draft Interim Staff Guidance (ISG)-015 "Post-Combined License Commitments" (ADAMS ML0935200681). The staff discussed NRC's position on the public comments received from NEI. The staff plans to incorporate some of the comments and clarifying language into the final ISG-015, which will be issued no later than December 23, 2009.

At the conclusion of the afternoon session, DE staff presented an update on the applicability of ASME Code Section III and Section XI prior to fuel load (ADAMS ML093491130). The update emphasized that ASME will be assigning a code task team by early 2010 to address conflicting requirements between the ASME Code and Part 52 process.

No members of the public attended the meeting and one Public Meeting Feedback Form was received. Please direct any inquiries to Mahmoud Jardaneh at 301-415-2753 ([mahmoud.jardaneh@nrc.gov](mailto:mahmoud.jardaneh@nrc.gov)).

Enclosure 1: Agenda (ADAMS Accession Number: ML093561287)

Enclosure 2: Meeting Attendees List

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Enclosure 2: Meeting Attendees List

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OFFICE	NRO/DCIP/CTSB	NRO/DCIP/CTSB:BC
NAME	M. Jardaneh	M. Kowal
DATE	12/23/2009	12/23/2009

**OFFICIAL RECORD COPY**

# AGENDA

## Category 3 Public Meeting on ITAAC Maintenance

Hilton Hotel & Executive Meeting Center  
Rockville, MD  
December 17, 2009

8:30 a.m. – 8:45 a.m.	Opening Remarks
8:45 a.m. – 10:15 a.m.	License Amendment and ITAAC Maintenance Discussion
10:15 a.m. – 10:30 a.m.	Break
10:30 p.m. – 11:00 p.m.	As-Built Definition
11:00 p.m. – 12:00 p.m.	ITAAC Inspectability
12:00 p.m. – 1:00 p.m.	Lunch
1:00 p.m. – 1:30 p.m.	ITAAC Inspectability (continued)
1:30 p.m. – 2:15 p.m.	Public Comments on Draft ISG-015
2:15 p.m. – 2:30 p.m.	Break
2:30 p.m. – 3:00 p.m.	Usage of ASME Code Section III vs. XI
3:00 p.m. – 3:15 p.m.	Closing Remarks

**Category 3 Public Meeting on ITAAC Maintenance, December 17, 2009  
Hilton Hotel & Executive Meeting Center  
Rockville, MD  
Meeting Attendees**

<b>Name</b>	<b>Organization</b>		<b>Name</b>	<b>Organization</b>
Arnold, Larry	STPNOC		Gilligan, Bernard	HPSA
Barss, Dan	NRC		Grant, Eddie	NuStart
Berger, J. Pierre	EDF		Greene, Jon	Unistar
Bilik, Tom	NRC		Grumbir, Rich	NuStart/Excel
Blamey, Alan	NRC		Hastie, David	SHAW Group Inc
Blessing, Christian	Hitachi		Imbro, Gene	NexGen Eng.
Bryant, Barry	Dominion		Jardaneh, Mahmoud	NRC
Burdick, Stephen	Morgan Lewis		Keithline, Kimberly	NEI
Campbell, Patricia	GEH		Mallon, James	PSEG
Cerne, Tony	NRC		Oddo, John	SHAW Group Inc.
Dusek, Lansing	Fluor		Oesterle, Eric	NRC
Fay, Tom	TANE		Ogle, Charles	NRC
Finklin, Pamela	Fluor		Ray, Thom	Westinghouse
Frost, John	NRC		Robillard, David	PSEG
Gardner, Ron	NRC		Sebrosky, Joseph	NRC
Gaslevic, James	NRC		Spencer, Michael	NRC
Giles, Julie	SCE&G		Szoch, Richard	Unistar
Gilles, Nanette	NRC		Tappert, John	NRC
Kerr, Chris	Exelon		Taylor, Larry	Progress Energy
Kinard, Jim	Areva		Terao, David	NRC
Kleeh, Edmund	NRC		Thompson, Ryder	SCE&G
Kowal, Mark	NRC		Uchiyama, Junichi	Mitsubishi
Kozak, Tom	NRC		Volkoff, John	Unistar
Lanksbury, Roger	NRC		Waites, Brandon	Southern Company
Laura, Richard	NRC		Williams, Kevin	NRC
Maciejewski, John	INPO		Wilson, Jerry	NRC