



NRC INSPECTION MANUAL INSPECTION PROCEDURE 40600

Licensee Program for ITAAC Management

**Construction ITAAC Team
NRO/DCIP/CTSB**

Inspection Procedure Objectives

Inspection of the Licensee program will verify the licensee's:

- Establishment of programmatic control
- Process adequacy for preparing and approving ITAAC Closure Letters (ICL)
- Implementation of ICL program in accordance with approved procedures and instructions
- Implementation of ITAAC maintenance program

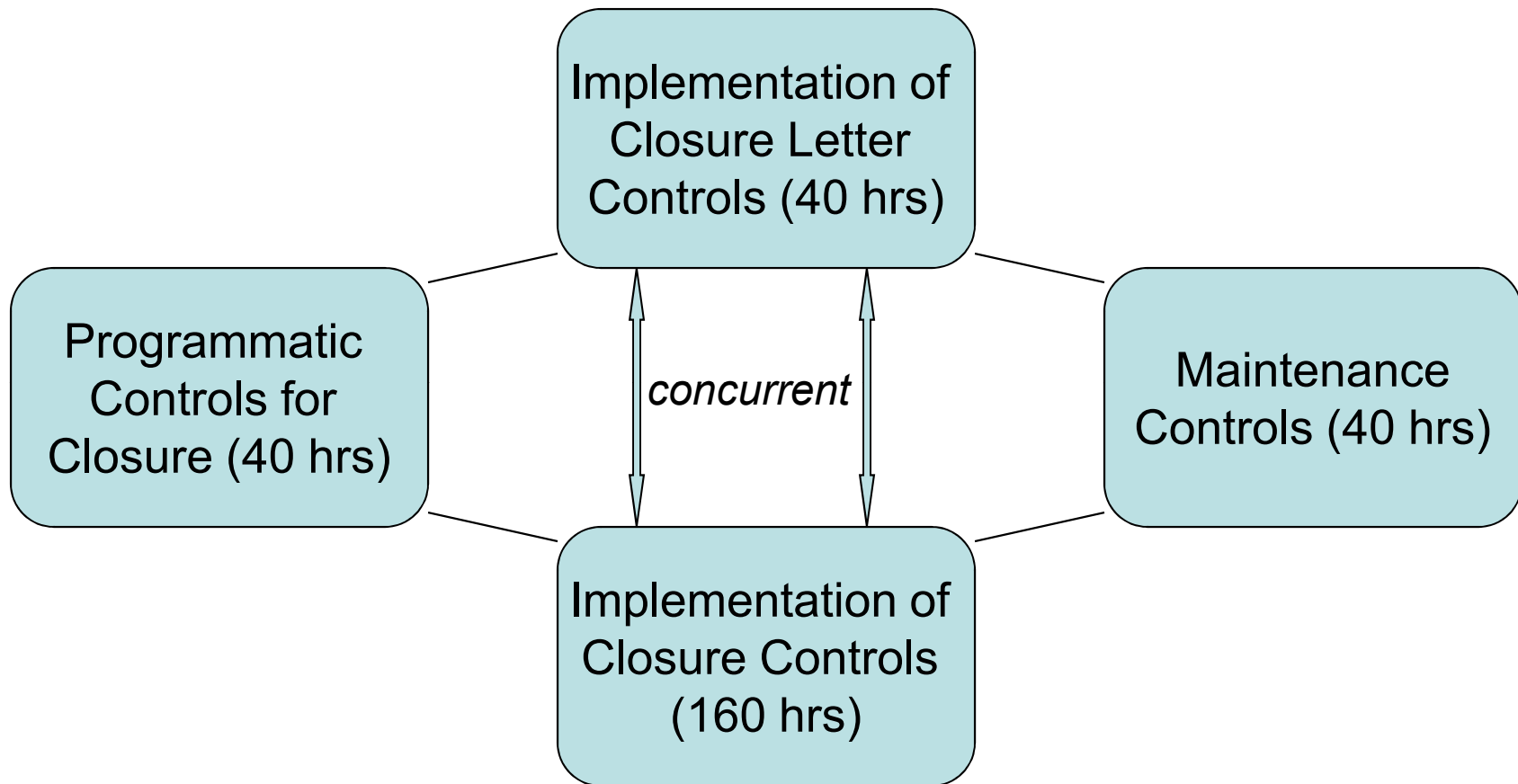
Inspection Requirements and Guidance

- **10 CFR 52.80**, Contents of applications; additional technical Information
- **10 CFR 52.99**, Inspection during construction
- **10 CFR 52.79(a)(25)**, Contents of Applications, technical information in FSAR, QA program description
- **RG 1.215**, Guidance for ITAAC Closure Under 10 CFR Part 52



Inspection Procedure Sections

Inspection Schedule and Resource Allocation



Total Resource Estimate = 280 hours

2.01 Programmatic Controls for ITAAC Closure

- Implemented as early as is reasonable in the construction of facility
- One inspector over one-week period
- Review program established to control construction and tracking activities
- Assess documentation and record control
- Review Licensee process to satisfy 10 CFR 52.99

2.02 Implementation of ITAAC Closure Letter Control

- Implemented when licensee has submitted sufficient number of ICL
- One inspector over one-week period
- Review detailed process for generation, validation, and submittal of ICL
- Assess framework for organization, QA, responsibility, and authority as approved

2.03 Implementation of ITAAC Closure Controls

- Implemented when licensee has submitted sufficient number of ICL
- Two inspectors over two separate week-long periods
- Verify implementation of licensee ITAAC closure program as approved
- Review ITAAC closeout packages and supporting documentation as evidence of ITAAC acceptability and closure

2.04 ITAAC Maintenance Controls

- Implemented after an ITAAC item is closed
- One inspector over one-week period
- Review detailed process for maintaining SSC's such that they continue to meet the acceptance criteria as described in ICL
- Assess framework for organization, QA, responsibility, and authority as approved

Procedure Completion

- Goal is to review 10 packages for sections 2.02, 2.03, and 2.04 of the procedure
- If less than 10 packages available, then all available packages will be reviewed
- The procedure is complete upon satisfactorily verifying the existence and adequate implementation and documentation of the successful completion and maintenance of ITAAC