

Inspections, Tests, Analyses, and Acceptance Criteria
Maintenance Thresholds and Associated License Amendments

Enclosure 1 to SECY 09-0119, "Staff Progress in Resolving Issues Associated with Inspections, Tests, Analyses, and Acceptance Criteria," dated August 26, 2009, presented four thresholds for identifying when activities would materially alter the determination bases for inspections, tests, analyses, and acceptance criteria (ITAAC). Throughout the past year, the U.S. Nuclear Regulatory Commission staff refined the ITAAC maintenance thresholds after interactions with interested stakeholders during the ITAAC public workshop series. These refinements are intended to optimize the effectiveness of the thresholds and to clearly articulate the criteria for reporting. Each item below is an updated version of the thresholds proposed in Enclosure 1 to SECY 09-119. Following each threshold is a discussion on license amendments that would be necessary beyond the envelope of the threshold. These discussions describe scenarios that pertain to the threshold and state when a license amendment would be necessary.

Threshold 1: Postwork Verification

Will the postwork verification (PWV) use a significantly different approach than the original performance of the inspection, test, or analysis (ITA) as described in the original ITAAC notification?

Threshold 1 involves situations in which the occurrence of an event could call into question whether a licensee continues to meet an acceptance criterion (AC). Such situations could involve many types of maintenance activities, including component replacement. After work is complete, a PWV will be used to confirm that the licensee still meets the AC. The PWV is not a performance of the ITA because the licensee has already satisfied the requirement to perform the ITA; instead, the PWV and its results supplement the performance of the ITA to provide confidence that the licensee continues to meet the AC. The nature and the scope of the PWV will depend upon the nature of the initiating event, the maintenance activities undertaken, and the specific ITAAC that is implicated by the event. If the PWV represents an alternate approach that is significantly different from the approach described in the original ITAAC notification, a supplemental notification is necessary to provide the agency and members of the public information that is material to the agency's determination on ITAAC.

Because the PWV is not a performance of the ITA but rather a supplement to the performance of the ITA, the PWV does not have to comport with the ITA set forth in the license. However, the licensee would need to seek an amendment to that ITA in the license if no reasonable "alternate" PWV approach is available to demonstrate that the AC continues to be met. Whether an alternative PWV is reasonable or not depends on several factors, including the engineering justification provided and the wording of both the ITA and the AC. A reasonable alternative to the original ITA represents a different, yet acceptable, engineering equivalent for performing the activity prescribed in the ITAAC. As an example, if a test was the original prescribed ITA, then the PWV should also be a test, or possibly a combination of a test and analysis or a test and an inspection. The PWV methodology should generally follow the methodology used in the original prescribed ITA.

A license amendment would also be necessary if the PWV reveals that the licensee never met the AC because the original ITA, as worded in the license, was flawed.

Threshold 2: Engineering Changes

Will an engineering change be made that materially alters the determination that the acceptance criteria are met?

License amendments would also be necessary if the engineering change results in the need to identify new AC or if the engineering change results in a design for which the AC as written cannot be demonstrated using the original ITAs.

Threshold 3: Population of Systems, Structures, and Components

Will there be additional items that need to be verified through the ITAAC?

A license amendment would be needed if there are additional items subject to verification through the existing ITAAC, but the licensee proposes not to perform the ITAs specified in the ITAAC. An amendment would also be required if new or amended ITAAC are needed to cover new items (e.g., the new items are of a different type than those covered in the original ITAAC).

Threshold 4: Complete and Valid ITAAC Representation

Will any other licensee activities materially alter the ITAAC determination basis?

A license amendment would be needed if an update of the determination basis necessitates a change to any portion of ITAAC in the license for reasons not covered under thresholds 1, 2, and 3.