DRAFT COPY

ITAAC CLOSURE VERIFICATION PROCESS FLOWCHART

INPUT – Licensee Submits ITAAC Closure Letter (ICL) (1)

NRO PM Evaluates if ICL's Format and References Are Correct (2) — No / Yes

EXISTING DAC EVALUATIONS

CIPIMS

CONSTRUCTION INSPECTION PROGRAM BRANCH (CIPB)

DAC or Targeted ITAAC (3) — Yes / No — DAC or Targeted ITAAC / Non-targeted ITAAC

INPUT Allegation or Licensee Identified Issue (9)

From Box 8

B

ITAAC Finding ? (8) — No / Yes

NRO PM and Other NRO Reviewers Determine if ITA Performed and AC Met for Targeted ITAAC or DAC (4) — Yes / No

NRO PM Makes Corrections (11)

To Box 8

B

NRO and/or NSIR BCs Approve Unconditional Closure of ITAAC and Update EPM (10) — No / Yes

NRO PM and Other NRO Reviewers Determine if ITA Performed and AC Met for Non-Targeted ITAAC (5) — Yes / No

CIPIMS

NRO/DCIP BC concurs on closure of ITAAC and updates EPM (12)

CONSTRUCTION ASSESSMENT, ENFORCEMENT, & ALLEGATIONS BRANCH (CAEB)

A

To Box 20

NRO PM & BC approve conditional closure in EPM of Non-targeted ITAAC and Check on Status of Targeted ITAAC (7)

70% of Targeted ITAAC in same ITAAC family are closed (6) — No / Yes

OUTPUT – Conditional closure published on NRC website (13)

OUTPUT – EPM generates draft FRN to publish the closure of the ITAAC (14)

Supplemental ICL (Individual or Other ITAAC)

New ICL

Region II Inspection (24)

Licensee Makes Corrections (23)

OUTPUT – ITAAC Remains Closed (16)

ITAAC Restored by Licensee Programs (19) — No

ITAAC Population Increases or Determination Basis Materially Affected or PWV Different from ITA in ICL or Engineering Change (18) — Yes

4 Maintenance Thresholds

INPUT – Licensee Identifies Condition that Affects Closure of Closed ITAAC (17)

INPUT – Licensee Determines ITAAC Cannot Be Performed As Written (27)

CONSTRUCTION ASSESSMENT, ENFORCEMENT, & ALLEGATIONS BRANCH (CAEB)

From Box 8

A

Site-specific or/and Tier 1 ITAAC Changes (20) — Yes / No

Licensee Requests License Amendment/ Exemption (21)

License Amendment/ Exemption Approved (22) — Yes / No

Region II Inspection (25)

Other ITAAC

OUTPUT ITAAC Closure Is Retracted by Issuing FRN (26)

Other ITAAC

NRO Evaluates if Other ITAAC are to be Reopened (15) — Yes / No

Other ITAAC

Enclosure 2
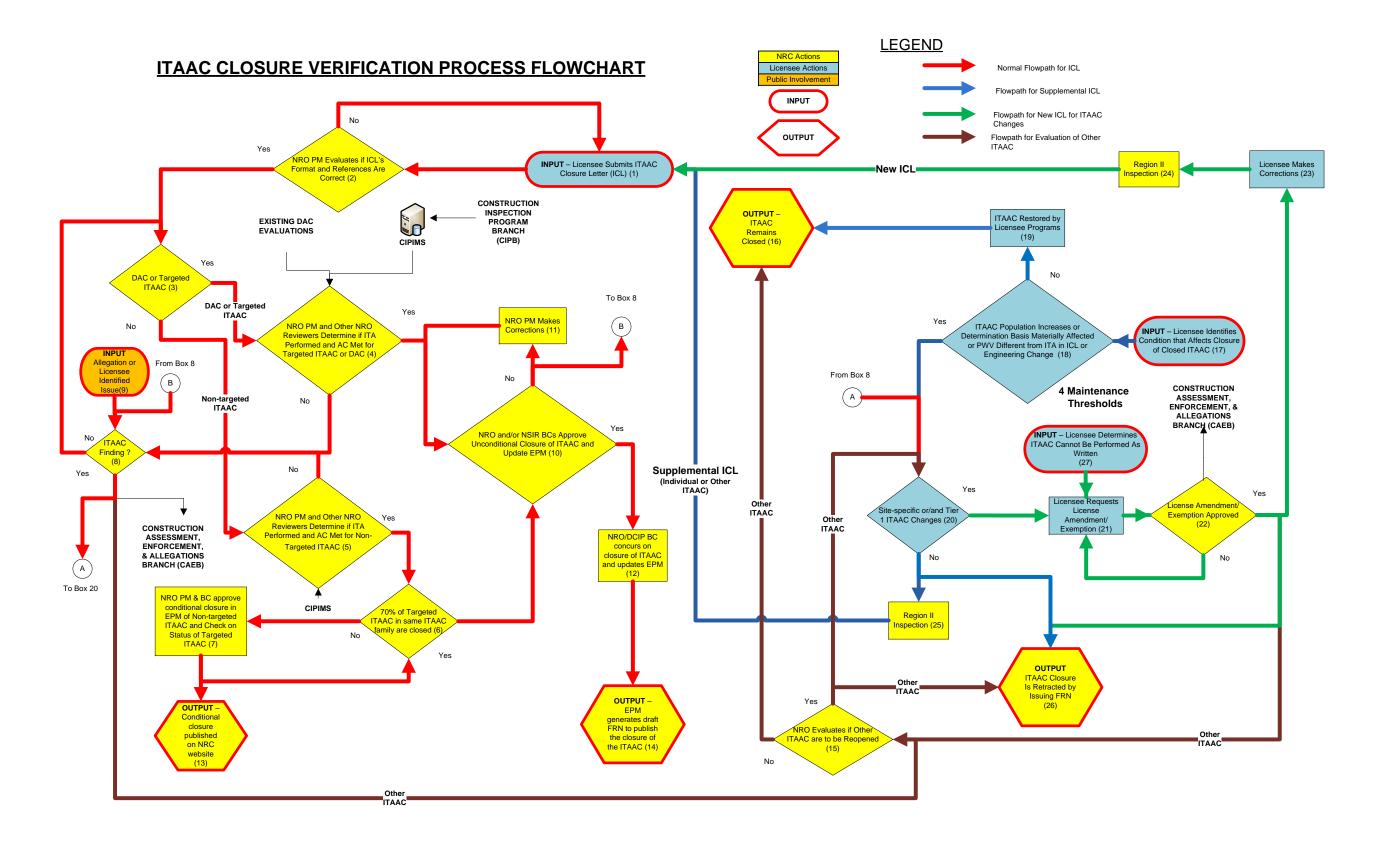
DESCRIPTION OF ITAAC CLOSURE VERIFICATION PROCESS

(1)   Licensee may submit to the NRC initial, new, or supplemental ICLs. If (22) is "yes", the licensee submits a new ICL for a license amendment/exemption for changes to site-specific and/or Tier 1 ITAAC. If (20) is "no", the licensee submits a supplemental ICL for licensee actions that may affect the closure of a previously closed ITAAC, physical installations, post-maintenance verification of SSCs associated with an ITAAC, and the content of an ICL previously submitted to the NRC. NRO PM determines during an "acceptance review" if the ICL has correct format and references based on the examples of ICLs developed by the NRC and industry.

(2)   If (2) is "no", either the format or/and the references of an ICL is/are not correct. The NRC informs the licensee by a letter of the rejection of the ICL. Licensee corrects the errors in the ICL and resubmits it for "acceptance" by the NRC.
        If (2) is "yes", both the format and the references of an ICL are correct. The DCIP PM should also verify that all ITAAC-related construction findings for an ITAAC or DAC are closed. The NRO PM manually acknowledges acceptance of the ICL in EPM by an electronic signature.

(3)   NRO PM determines if the ITAAC is a DAC or Targeted ITAAC.

(4)   If (3) is "yes", the ITAAC is either a DAC or targeted ITAAC. NRO PM determines for this DAC or ITAAC if its ITA was performed and its AC was met based on sufficient information in the ICL. This decision is made by referring to inspection records in CIPIMS, licensee's certifications in the ICL, and if necessary, licensee's supporting documentation at plant site. For the DAC or targeted ITAAC, primary and secondary technical reviewers, assigned to this review by their NRO and/or NSIR respective branch chiefs, may provide input to the decision on the closure of the DAC or ITAAC. The inspection records for the DAC will contain evaluations of the portion of the design not reviewed during the design reviews for the design certification application. NRO PM and reviewers approve the DAC or targeted ITAAC as being ready for closure and manually indicate their approval in EPM by their electronic signatures.

(5)   If (3) is 'no', the ITAAC is a non-targeted ITAAC. NRO PM and reviewers determine for the non-targeted ITAAC if its ITA was performed and its AC met based on sufficient information and the licensee certifications in the ICL This review will be similar to that for targeted ITAAC and DAC, except there may be no inspection records in CIPIMS to further corroborate the closure of a non-targeted ITAAC.

(6)   If (5) is "yes", NRO PM will determine if 70% of targeted ITAAC in the same ITAAC family, as non-targeted ITAAC, are closed.

(7)   If (6) is "no", the NRO PM & BC conditionally close the non-targeted ITAAC in EPM. The conditional closure of a non-targeted ITAAC does not go through entire ITAAC review cycle, but the review stops at a designated NRO BC. The conditional closure can be revoked by inspection, allegations, maintenance, or design issues that arise against ITAAC in the same ITAAC family as the non-targeted ITAAC. If non-targeted ITAAC is conditionally closed, NRO PM manually checks periodically on whether the 70% of targeted ITAAC in same ITAAC family have been closed based on information in EPM concerning the targeted ITAAC. If the non-targeted ITAAC is conditionally closed, the NRC will publish its conditional closure on an NRC website selected for that purpose. If the conditional closure of the non-targeted ITAAC is revoked, that will be published on this same website.

(8)   If either (4) or (5) or (10) is/are "no" or if there is an allegation or licensee-indentified issue (9) that affects ITAAC closure, NRO PM informs the DCIP assessment branch about the ITA not being performed or/and the AC not being met. DCIP assessment team, Region II, and other NRO and/or NSIR divisions will determine if there should be an ITAAC finding. An ITAAC finding will prevent an ITAAC from being closed and could cause a closed ITAAC and other closed ITAAC in same ITAAC family to be reopened. If an ITAAC finding requires ITAAC changes, a new ICL(s) is/are required at (22), but if changes are only to physical installation or/and documentation supporting closure of an ITAAC in an ICL or at site, then supplemental ICL(s) will be required at (20). If (8) is "no", then ITAAC re-enters ITAAC review process just prior to (3).

(9)   Allegation or licensee-identified issue against an open or previously closed ITAAC that affects its closure is received and reviewed by DCIP, Region II, applicable NRO and/or NSIR divisions. Allegation may result in an ITAAC finding at (8) which may (a) prevent the closure of an ITAAC, or (b) cause a closed ITAAC and other ITAAC in same ITAAC family to be reopened.

(10)   If (4) or (6) is "yes", NRO and/or NSIR branch chiefs manually approve the DAC or targeted ITAAC or non-targeted ITAAC for unconditional closure in EPM by their electronic signatures.

(11)   If (10) is "no", NRO and/or NSIR BCs have made comments which have to be corrected before the ITAAC can be approved for closure. A NRO PM will make the changes, and they will be reviewed by a designated NRO BC for concurrence. If NRO and/or NSIR BCs have comments that call for some action by the licensee, the NRO PM will initiate contact with the licensee based on direction by NRO/BC.

(12)   If (10) is "yes," DCIP/BC concurs with closure of the ITAAC and issuance of the FRN. DCIP/BC's concurrence is manually input into EPM

(13)   NRO PM publishes conditional closure of the non-targeted ITAAC on an NRC website.

(14)   EPM generates a draft FRN when DCIP/BC concurs on closure of the ITAAC. The draft FRN is sent to appropriate NRC group for issuance. The draft FRN may announce the closure of one or several ITAAC.

(15)   When an ITAAC cannot be closed "yes" output at (8) or must be reopened "yes" output at (22), NRO evaluates if the closures of other ITAAC in the same ITAAC family are affected. A supplemental ICL must go through the process for ITAAC closure before the impact on other closed ITAAC in same ITAAC family can be determined. If (15) is no, then the other ITAAC being evaluated remain closed (16).

(16)   ITAAC remains closed if licensee through its programs restores ITAAC to compliant condition (19). In addition, if (15) is "no", then ITAAC remain(s) closed (16).

(17)   Licensee actions precipitate a condition that affects the closure of a previously closed ITAAC.

(18)   Licensee determines one or more of the four maintenance thresholds for an ITAAC has been exceeded due to one or more of the following: (a) population of SSCs identified in ITAAC has increased or (b) the determination basis of the ICL for ITAAC is materially affected due to licensee activities, or c) post-work verification, different from the original ITA for ITAAC, is performed which requires an engineering justification, or (d) an engineering change for SSCs associated with the ITAAC materially affects the determination that the acceptance criteria of the ITAAC was met..

(19)   If (18) is "no", then licensee programs, like PI&R, configuration management, etc, restore ITAAC to compliant condition, and ITAAC remains closed (16).

(20)   If (8), (15), or/and (18) is "yes", then the licensee evaluates if changes are required to Tier 1 or site-specific ITAAC due to (a) exceeding a maintenance threshold (18) , (b) ITAAC finding (8), and/or (c) for other ITAAC being reopened (15).

(21)   If (20) is a "yes", then the licensee requests a license amendment and exemption to seek changes to a Tier1 ITAAC or submits just a license amendment to seek changes to a site-specific ITAAC.

(22)   License amendment approved or disapproved by the NRC. If approved, the closure of ITAAC is affected because of Tier 1 or/and site-specific ITAAC changes, and the licensee submits new ICL(s). If not approved, then the licensee will make changes to license amendment and resubmit to the NRC. Other closed ITAAC in same ITAAC family as ITAAC being reopened are evaluated to determine if their closure is also affected (15). The determination will have to made for those other ITAAC if they are to reopened also.. The NRO PM shall status the individual and other ITAAC, which is/are contained in license amendment, as being "reopened" in EPM when license amendment is approved. For those ITAAC that need to be reopened, EPM will be updated to reflect the status of those ITAAC as being "reopened."

(23)   Licensee receives a letter from NRC about the license amendment being approved. Licensee makes the necessary corrections which consist of any or all of the following for all the ITAAC affected: (a) modifications to affected physical installations, (b) change(s) to ITAAC and/or Tier 1 of Design Control Document of specific certified design, (c) revision to supporting calculations and analyses for an ITAAC, (d) performance of a new ITA, (e) validation that new AC of affected ITAAC is/are now met, and/or (f) changes to content of ICL(s). The other ITAAC in same ITAAC family go through this same process when a licensee amendment for singular ITAAC is approved.

(24)   Region II performs additional inspections, as required, after informal notice from licensee to verify the licensee corrections identified in Item (22) above. After Region II performs inspections, if necessary, then the licensee makes any additional changes and submits new ICL(s) to the NRC because of the ITAAC changes identified for the individual and other ITAAC.

(25)   If (20) is "no", then Region II performs additional inspections, as required, after informal notice from licensee to verify the licensee corrections made because one or more of the four maintenance thresholds was crossed.. After Region II performs inspections, if necessary, then the licensee makes any additional changes and submits a supplemental ICL to the NRC. The supplemental ICL should indicate whether the closure of the ITAAC is affected or not. If closure is affected, the NRC will issue an FRN (26) to revoke its closure. The determination of whether closure of ITAAC is affected may be made by the NRC after review of supplemental ICL or before supplemental ICL is submitted by the licensee. If the determination is made after review of supplemental ICL, then a revised supplemental ICL will have to submitted by the licensee that reflects that closure of ITAAC is affected.

(26)   If (15) or (22) is "yes", then an FRN is published to revoke the closure of the ITAAC previously closed.

(27)   Licensee determines that a given ITAAC as written cannot be performed because ITA cannot be implemented or AC met.