



U.S. EPR ITAAC "AS-BUILT" TECHNICAL JUSTIFICATION

June 24, 2010

Desired Outcome

- To have a common understanding of how the U.S. EPR intends to implement the technical justification of "as-built" ITAAC performed in other than their final location



Technical Justification Identification

- For performance of “as-built” ITAAC in other than their final location U.S. EPR will:
 - Identify inspection and test performance location in the ITAAC schedule
 - Identify inspection and test performance location by correspondence (HQ, site inspectors, or other) in specific cases
 - Communicate routinely with Resident Inspectors regarding ITAAC intent and status
 - Reference NEI 08-01 guidance
 - Document technical justification in ITAAC Closure Package



NEI 08-01 Technical Justification Guidance

- Paragraph added to NEI 08-01 Section 4.2
 - As early as practicable, licensees should discuss specific technical justifications with the NRC for “as-built” inspections, tests or analyses to be performed at other than the final installed location of SSCs that are not covered by the generic technical justifications discussed in Sections 8.5.1 – 8.5.6. This communication is important to allow the NRC to identify any questions or concerns with the licensee’s plans.